

7001-335

10-20-2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 20 2003

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Lisa J. Strong  
J.R. Simplot Company  
16777 Howland Rd  
P.O. Box 198  
Lathrop, CA 95330-0198

Dear Ms. Strong:

Subject: LEAFEX 3

EPA Registration Number 7001-335  
Application Dated September 23, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following changes before you release the product for shipment.

1. Change "waterproof gloves" to "chemical resistant gloves made of any waterproof material" under PPE and Agricultural Use Requirements.
2. Add appropriate Spray Drift Management text. See attached.
3. Under STORAGE AND DISPOSAL, change "Storage" to "Pesticide Storage", remove "Empty" from "Empty Container Disposal", and place Spill section and directions after Container Disposal.

Submit three (3) copies of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Tompkins".

James A. Tompkins, haj  
Product Manager 25  
Herbicide Branch  
Registration Division (7505C)



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**Attachment-Spray Drift Management**

Under the heading **Spray Drift Management** the text should read as follows:

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions. The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed  $3/4$  the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees. Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

**Importance of Droplet Size**

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversion section of this label).

**Controlling Droplet Size**

**Volume**-Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.

**Pressure**-Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.

Number of nozzles-Use the minimum number of nozzles that provide uniform coverage.

Nozzle Orientation-Orienting nozzles so that the spray is released backwards, parallel to the airstream will produce larger droplets than other orientations. Significant deflection from the horizontal will reduce droplet size and increase drift potential.

Nozzle Type-Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce larger droplets than other nozzle types.

Boom Length-For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

Application-Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

#### Swath Adjustment

When applications are made with a cross-wind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.).

#### Wind

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect drift.

#### Temperature and Humidity

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

### Temperature Inversions

Applications should not occur during a temperature inversion, because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun set and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a connected cloud (under low wind conditions) indicates an inversion, while smoke that moves upwards and rapidly dissipates indicates good vertical air mixing.

### Sensitive Areas

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

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# LEAFEX 3

## DEFOLIANT – DESICCANT

**ACTIVE INGREDIENT:**

Sodium Chlorate ..... 28.0%

**OTHER INGREDIENTS:** ..... 72.0%

**TOTAL:** ..... 100.0%

Each gallon contains 3 lbs. of Sodium Chlorate with fire retardant.

EPA Reg. No. 7001-335

EPA Est. No. 57372-AZ-1

**Read The Entire Label Before Using This Product.**

Use Only According To Label Instructions.

**NOTICE:** Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If Conditions of Sale and Warranty are not acceptable, return the product unopened within thirty days of purchase to the place of purchase.

**NET CONTENTS: XXX Gallons**

Manufactured For:

**Simplot**

**J.R. SIMPLOT COMPANY**

P. O. Box 198 • Lathrop, CA 95330

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

OCT 20 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

7001-335

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

FIRST AID	
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have a person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

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## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. May irritate eyes, nose, throat and skin. Avoid contact with skin, eyes and clothing. Avoid breathing spray mist.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

APPLICATORS AND OTHER HANDLERS MUST WEAR:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure
- Dust/mist filtering respirator (MSHA/NIOSH) approval number prefix TC-21C or a NIOSH approved respirator with any N, R, P, or HE filter.
- Waterproof gloves
- Protective eyewear
- Chemical-resistant apron when cleaning equipment, mixing or loading

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should: (1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet; (2) Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing; (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

### ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Do not apply when weather conditions favor drift away from target area.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE), notification to workers and Restricted Entry Interval. The requirements in this box only apply to uses of this product that are covered by the Workers Protection Standard.

Do not enter or allow worker entry into treated areas during the Restricted Entry Interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is: Coveralls; waterproof gloves; shoes plus socks.

### APPLICATION

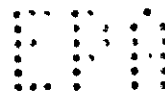
LEAFEX 3 may be applied by aircraft or ground equipment. Thorough coverage of the crop plant is essential. Results may be enhanced by the addition of a good, nonionic spreader sticker to the spray mixture. Use at a rate recommended on label by manufacturer. Low temperatures require more time for LEAFEX 3 to act and requires the higher rate. Tall plants and rank foliage will require a larger volume of spray. Do not apply during windy weather as spray drift to susceptible nearby crops may cause damage. Do not apply during very high temperatures. Prevailing conditions will govern the rate of LEAFEX 3 to use.

DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM.

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**COTTON DEFOLIATION:** Stage of plant growth and prevailing weather conditions markedly affect the defoliation process. Best results are obtained when soil fertility and moisture are adequate, the boll set is heavy, all bolls are mature, vegetable growth has stopped and there is little or no second growth. Leaves should be green and turgid. Bolls less than 35 days old may not mature after application of this product. Apply 2 or 3 weeks before anticipated picking date on clear days when temperature will go above 70°F.

- Do not apply during windy weather.
- Do not apply under conditions of extreme heat during middle of the day.
- Do not apply within 7 days of harvest.
- Make no more than two applications.
- Do not graze treated areas or feed gin waste to livestock.



**RATES TO USE (All States Except Arizona):**

**Air Application:** Apply 1-1/3 gallons LEAFEX 3 in 4-10 gallons of water.

**Ground Application:** Apply 1-1/3 gallons LEAFEX 3 in 20-30 gallons of water.

**RATES TO USE — ARIZONA ONLY:**

**Air Application:** Apply 1-1/3 to 1-3/4 gallons LEAFEX 3 in 4-10 gallons of water.

**Ground Application:** Apply 1-1/3 to 1-3/4 gallons LEAFEX 3 in 20-30 gallons of water.

**GRAIN SORGHUM and MILO DESSICATION:** To reduce the moisture content in grain while the crop is standing, use 1-1/2 to 2 gallons LEAFEX 3 per acre in enough water to give thorough coverage; may be applied by aircraft or ground equipment. Make application 7 to 10 days before anticipated harvesting date. Use the lower rate when grain sorghum and weather are right for rapid desiccation. For air application, use 5 to 6 gallons of ready-to-apply material per acre. For ground equipment, use 20 to 30 gallons of total solution per acre. Do not graze treated fields or feed treated fodder, forage or residual seeds within 14 days of application.

**CORN HARVEST AID:** For desiccation of trash weeds in early maturing corn, use 2 gallons of LEAFEX 3 in 5 to 7 gallons of water per acre by air. Apply at least 14 days before anticipated harvest date on clear days when temperature is expected to go above 70°F. Use the 5 gallon rate when weeds are small and the crop canopy is fairly open. Do not graze treated fields or feed fodder, forage or residual seeds within 14 days of application.

**RICE HARVEST AID:** For the desiccation of immature red rice in mature white rice, use 1-1/2 to 2 gallons LEAFEX 3 in enough water to make 10 gallons of ready-to-apply material per acre by air. Apply 7 days before harvest. Do not graze treated fields or feed fodder, forage or residual seeds within 14 days of application.

**SOYBEAN HARVEST AID:** To desiccate weeds in early maturing soybeans and facilitate the harvest, apply 2 gallons of LEAFEX 3 in enough water to give thorough coverage, preferably by air. Make application 7 to 10 days before anticipated harvesting date when beans are mature and ready for harvest. For air application, use 7 to 10 gallons of total solution per acre. Do not graze treated fields or feed treated bean foliage and fodder.

**SUNFLOWERS (Confectionary and Oilseed Varieties):** To facilitate harvest and reduce moisture in the seedhead, apply 1-1/2 to 2 gallons of LEAFEX 3 in enough water to give thorough coverage, preferably by air. Make application 7 to 10 days before anticipated harvest date. Use the lower rate when conditions favor rapid desiccation. For air application, use 7 to 10 gallons of total solution per acre. Do not graze treated fields or use residual seeds for food or feed within 14 days of application.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**STORAGE:** Store in the original container in a cool, dry, fire resistant, secured storage area; separate from acids, solvents, oils, organic substances, sulfur, powdered metals and away from fire hazards.

**SPILL:** In case of spill, use clay or earth-based absorbent material, then sweep or vacuum. If spilled on concrete or metal floors, flush with water after sweeping or vacuuming. Place in metal containers with tight-fitting lids until used or disposed.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**EMPTY CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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#### CONDITIONS OF SALE AND WARRANTY.

J.R. Simplot Company warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. J.R. SIMPLOT COMPANY MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE. Handling, storage and use of the product by Buyer or User are beyond the control of J.R. Simplot Company and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pest, drift to other crops or property or failure to follow label directions, will be assumed by the Buyer or User. In no case will J.R. Simplot Company or Seller be held liable for consequential, special or indirect damages resulting from the handling, storage or use of this product.

JRS 3132(1195/0803)