



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

OFFICE OF  
PREVENTION, PESTICIDES  
TOXIC SUBSTANCES

AND

AUG 31 2005

Ms. Rebecca Hargadine  
Gowan Company  
P. O. Box 5569  
Yuma, AZ 85366

Dear Ms. Hargadine:

Subject: Avadex BW Technical (Update Label)  
EPA Registration No. 10163-288  
Application Dated June 21, 2005

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 change before you release the product for shipment.

--Under Storage and Disposal, revise "Storage" to read "Pesticide Storage".--

Please submit two (2) copies of your final printed labeling incorporating the above change before you release the product for shipment. Amended labeling supercedes all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

*James K. Walters, Jr.*  
James Tompkins  
Product Manager 25  
Herbicide Branch  
Registration Division (7505C)

# TRIALATE Technical

<b>ACTIVE INGREDIENT:</b>	<b>% By Wt.</b>
*Triallate, S-(2,3,3-trichloroallyl)-diisopropylthiocarbamate .....	96.0%
<b>OTHER INGREDIENTS:</b> .....	4.0%
	<b>TOTAL 100.0%</b>

## 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 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>
<ul style="list-style-type: none"> <li>• Have the product container or label with you when calling a poison control center or physician, or going for treatment.</li> <li>• In case of an emergency involving this product, call toll free 1-888-478-0798.</li> <li>• This product is identified as <b>Triallate Technical, EPA Reg. No. 10163-288.</b></li> </ul>	

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

#### CAUSES MODERATE EYE IRRITATION. HARMFUL IF SWALLOWED.

Avoid contact with skin, eyes or clothing. Avoid breathing vapors. To avoid contact with skin or eyes, wear rubber gloves and goggles when handling. Wash thoroughly with soap and water after handling. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

#### ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your state Water Board or Regional Office of the EPA.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Only for formulation into herbicides applied to sugarbeets, barley, lentils, peas, and wheat exclusively at preemergent or preplant incorporated application timing.

#### STORAGE AND DISPOSAL

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

**STORAGE:** Melt contents to 40°C (104°F) before emptying. Never heat above 48°C (120°F) during handling or use.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Emptied container retains product residue. Observe all labeled safeguards until container is cleaned, reconditioned or destroyed. Triple rinse emptied bulk containers. Then offer for recycling or reconditioning, or dispose of in a manner approved by state and local authorities.

NET CONTENTS \_\_\_\_\_ GALLONS



ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
AUG 31 2005

Gowan Company  
370 S. Main Street  
Yuma, Arizona 85364

EPA Reg. No. 10163-288  
EPA Est. No. 082212-HKG-001

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
10163-288