

11656-90

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

Mr. Robert C. Ehn
Western Farm Service
2787 W. Bullard, Suite 105
P.O. Box 1168
Fresno, CA 93715-1168

Dear Mr. Ehn:

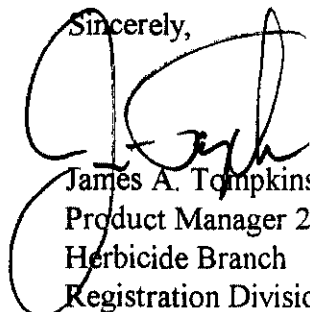
Subject: First Choice Cotton Defoliant Concentrate
EPA Registration Number 11656-90
Application Dated August 23, 2003

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. It is recommended you add an Emergency Hotline phone number under First Aid for good product stewardship.
3. Change "Storage" to "Pesticide Storage" under STORAGE AND DISPOSAL
4. Add appropriate Spray Drift Management text. See attached.
5. Add maximum number of applications and maximum rate of application under General Use Directions for each use.
6. Add a statement that gives the pounds active ingredient per gallon of product, and place below the Ingredient Statement.

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,


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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COTTON DEFOLIANT CONCENTRATE

READ ENTIRE CONTAINER LABEL BEFORE USING THIS PRODUCT

ACTIVE INGREDIENT:
Sodium Chlorate..... 18.0%
INERT INGREDIENTS..... 82.0%
TOTAL..... 100.0%
CONTAINS UREA AS A FIRE RETARDANT

EPA REG. NO. 11656-90-ZA EPA EST. NO. 11656-CA-28

**KEEP OUT OF REACH OF CHILDREN
CAUTION**
FOR AGRICULTURAL USE ONLY OR FOR SALE TO, USE
AND STORAGE BY SERVICE PERSONS ONLY. DO NOT
STORE IN AREAS ACCESSIBLE TO CHILDREN.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY
STATEMENTS.

FIRST AID
If Swallowed: Call poison control center or doctor immediately
for treatment advice. Have person sip a glass of water if able to
swallow. Do not induce vomiting unless told to do so by the
poison control center or doctor. Do not give anything by mouth
to an unconscious person.
If In Eyes: Hold eye open and rinse slowly and gently with
water for 15-20 minutes. Remove contact lenses. If present,
after the first 5 minutes, then continue rinsing eye. Call a poison
control center or doctor for treatment advice.
If On Skin Or Clothing: Take off contaminated clothing. Rinse
skin immediately with plenty of water for 15-20 minutes. Call a
poison control center or doctor for treatment advice.
If Inhaled: Move person to fresh air. If person is not breathing,
call 911 or an ambulance, then give artificial respiration,
preferably by mouth-to-mouth, if possible. Call a poison control
center or doctor for further treatment advice.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS (& DOMESTIC ANIMALS):
CAUTION:
Harmful if swallowed. May cause skin irritation.
PERSONAL OR PROTECTIVE EQUIPMENT
Applicators and other handlers must wear:
• Long-sleeved shirt and long pants
• Waterproof gloves
• Shoes plus socks
Follow manufacturer's instructions for cleaning/maintaining
PPE. If no such instructions for washables, use detergent
and hot water. Keep and wash PPE separately from other
laundry.

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 or 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 Worker
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.

USER SAFETY RECOMMENDATIONS
Users should:
• Wash hands before eating, drinking, chewing gum,
using tobacco, or using the toilet.
• Remove clothing immediately if pesticide gets
inside. Then wash thoroughly and put on clean
clothing.
• 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
Spay, drift, seepage, and drainage will injure or kill all
vegetation. Do not graze treated areas or feed waste to
livestock. Keep out of lakes, ponds, or streams. Do not
contaminate water when disposing of equipment
washwaters.

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.

11656-90

011653-00090-20030825B-dhf.pdf

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. 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 regulations. Do not apply this product in a way that will contact workers or other persons, either directly or through drift.

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS.

CHEMICAL PROHIBITION

Do not apply this product through any type of irrigation system

GENERAL USE DIRECTIONS

COTTON: Defoliation-Apply 2 to 3 weeks prior to anticipated picking date. Do not treat later than 7 to 10 days prior to harvest. Thorough coverage of the plant is essential. Nozzles should produce large droplets. Satisfactory defoliation is usually secured with one application. However, dense or lodged cotton may need more than one application. Satisfactory defoliation may not be obtained if cotton is under moisture stress or if plant growth is retarded by cold weather.

AIRPLANE APPLICATION: Use 1 1/2 -3 gals. per acre in sufficient water to make 4-10 gals. total solution per acre. Use the lower rate when plants and weather conditions are ideal for defoliation. Swath width should not exceed wingspread and nozzles should produce large droplets. Altitude and speed of aircraft should be regulated to give good spray coverage. Do not apply during periods of excess wind so spray may drift and cause injury to other crops. Do not apply during very high temperatures to avoid rapid evaporation.

GROUND APPLICATION: Use 1 1/2 -3 gals. per acre in sufficient water to make 20-30 gals. total solution per acre. 6 to 8 nozzles per row are necessary to obtain good coverage.

BOTTOM DEFOLIATION: In tall rank cotton, defoliation of the lower leaves prior to regular defoliation assists in speeding up the maturity of bolls on lower portions of the plants as well as reducing boll rot by permitting more air and sunlight to penetrate into the lower parts of the plant. Spray the lower 1/3 to 1/2 of the plants only, using 4 to 6 quarts in 25 to 30 gallons of water per acre with flat fan nozzles when the bolls are mature. Spraying should be done during periods when drift is at a minimum. Application should be made during early morning or late evening hours to avoid rapid evaporation. Application should be made 2 to 3 weeks prior to anticipated picking date.

LIMITATIONS: Preharvest defoliation and desiccation. Do not graze treated areas or feed gin waste to livestock. Do not apply within 7 days of harvest.

CHILI PEPPERS: (Processing only). Use 2 to 5 gals. in 5 to 15 gals. of water by air. Use 20 to 40 gals. of water by ground. **DO NOT APPLY WITHIN 10 DAYS OF HARVEST, CONSULT YOUR PROCESSOR PRIOR TO APPLICATION.**

MILO: As a harvest aid to reduce excess moisture on Milo use 2 to 2.7 gals. per acre in 5 to 10 gals. of water by air application. Use 20 to 40 gallons of water by ground application. Do not use plant materials as food for meat animals within 14 days after harvest. **DO NOT APPLY WITHIN 10 DAYS OF HARVEST.**

STORAGE AND DISPOSAL

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

STORAGE

Keep in original container. Do not reuse empty container. Store in cool, dry place. Protect from excessive heat. Avoid storage near feed and food products. Do not store next to strong acids or emulsifiable concentrates of Parathion or Malathion. For help with any spill, leak, fire or exposure involving this material, call day or night (800) 424-9300.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of at an approved waste disposal facility.

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.

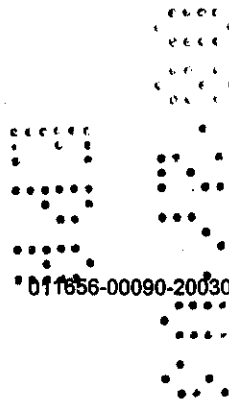
CONDITIONS OF SALE AND WARRANTY

WESTERN FARM SERVICE MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PURPOSE, OR OTHERWISE EXPRESS OR IMPLIED concerning this product or its uses which extend beyond the use of the product under normal conditions in accord with the statements made on this label.

NET CONTENTS: _____ GALLONS
NET WEIGHT: 9.7 lbs./gallon

Manufactured by:
WESTERN FARM SERVICE, INC.
P. O. Box 1168
Fresno CA 93715

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