MA 22 19713-127 PS 1510



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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Barbara Brown DREXEL CHEMICAL CO. P.O. Box 9306 Memphis, TN 38109 OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

File

Subject: Label Amendment Submission of 07/09/93 in Response to PR Notice 93-7 EPA P.eg. No. 19713-127 DREXEL CROAK

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

 BEFORE selling or distributing any product bearing the final printed labeling AND

• WITHIN one year from date of this acceptance.



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Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL) Office of Pesticide Programs (7505C) U.S. Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL) Office of Pesticide Programs Room 266A, Crystal Mall 2 1921 Jefferson Davis Highway Arlington, VA 22202

Sincerely, im Tompkins Deputy Chief **Registration Support Branch** Registration Division (7505W)

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Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division

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Barbara Brown DREXEL CHEMICAL CO BOX 9306 MEMPHIS TN 38109

Subject: Label Amendment Submission of 07/09/93 to Comply with WPS Labeling Requirements EPA Reg Nr. 19713-127 DREXEL CROAK

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

You have incorrect wording in the second-to-last sentence in the first paragraph in the Agicultural Use Requirements box on your proposed label. The sentence must be as follows: "It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval."

Protective eyewear is not required for early entry. You may remove it from the Ag Use Box if you so desire.

Move drift statement from Ag Use Box to Direction for Use.

Modify respirator statement per attached.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear:

* Long-sleeved shirt and long pants

* Waterproof gloves

* Chemical-resistant footwear plus socks

* Protective eyewear

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* Chemical-resistant apron when cleaning equipment, mixing or loading For exposures in enclosed areas:

* A respirator with either an organic vapor-removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) For exposure outdoors:

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* Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

DREXEL CROAK Fluometuron Plus MSMA For Post-emergence weed control in Cotton

ACTIVE INGREDIENTS:

This mixture contains 2.0 lbs. COTORAN 80 WP and 3.3 lbs. MSMA (6.0 lbs. DSMA equivalent) per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION

Shake Well Before Using

Revisions 6/93

BPA Reg. No. 19713-127 BPA Est. No. 19713-MS-1 Manufactured By: DREXEL CHEMICAL COMPANY P.O. BOX 9306, MEMPHIS, TN 38109-0306

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STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a Physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN BYES: Immediately flush eyes with plenty of soap and water and get medical attention.

IF ON SKIN: Immediately wash skin with plenty of soap and water while removing contaminated clothing and shoes. If irritation develops, seek medical attention.

IF INHALED: Remove victim to fresh air.

ACCEPTED with COMMENTS In EPA Letter Dated

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Under the Foderal Insecticide, Fundicide, and Rodentiside Act as amended, for the posticide registered under SPA Reg. No. 19713 -127

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION: Harmful if swallowed. May cause irritation of eyes, nose, throat and skin. Avoid contact with eyes, skin and clothing. Avoid breathing spray mist. Do not contaminate feed and food stuffs. PERSONAL PROTECTIVE EQUIPMENT (PP2) Applicators and other handlers must wear: Long-sleeved shirt and long pants Waterproof gloves Chemical-resistant footwear plus socks Dust/Mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C) Mixers and Loaders must wear: Long-sleeved shirt and long pants Waterproof gloves Chemical-resistant footwear plus socks Protective eyewear Chemical-resistant apron when cleaning, mixing or loading Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPB separately from other laundry.

USBR SAFETY RECOMMENDATIONS Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticides gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water used for irrigation or domestic purposes. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply when weather conditions favor drift from areas being treated.



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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 THROUGH ANY TYPE OF IRRIGATION SYSTEM.

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 CPR 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
Worker Protection Standard.
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.
Do not enter or allow worker entry into treated areas during
the restricted entry interval (BBI) of 24 hours.
Personal Protective Equipment 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, soils or water is:
Coveralls
Waterproof gloves
Chemical-resistant footwear plus socks
Protective eyewear

NON-AGRICULTURAL USE REQUIREMENTS The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The Worker Protection Standard applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Keep children and domestic animals off treated areas until this material has been washed into the soil.



GENERAL INFORMATION

CROAK is effective for post-emergence control of broadleaf and grass weeds in cotton such as:

Grass Weeds

Foxtail Goosegrass Johnsongrass Nutgrass Ryegrass Sandbur

Amount, in gallons needed for band

treatments

Broadleaf Weeds

Buttonweed Cocklebur Florida Pusley Goathead Jimsonweed Lambsquarters Morningglory Pigweed

Barnyardgrass Brachiaria

Crowfootgrass Dallisgrass

Fall panicum

Crabgrass

Prickly sida (ironweed or teaweed) Puncturevine Purslane Ragweed Sesbania Sicklepod Smartweed Tumbleweed

BAND TREATMENT

For band applications, the following formula may be used to calculate the amount of CROAK required:

Band width in inches ----- X 0.5 Row width in inches

BOUIPMENT

Use conventional spray equipment and Tee Jet nozzle tips 8002 to 8006, or equivalent. Screen size should be 50 mesh.

MIXING INSTRUCTIONS

CROAK is a highly concentrated formulation and should be thoroughly shaken before mixing. Pour recommended amount of CROAK into nearly filled spray tank or pre-mix in a bucket half filled with water and pour mixture into nearly filled spray tank. By-pass agitation should terminate at the bottom of the tank to minimize foaming. Avoid leaving spray mixture in tank without constant agitation.

Do not add surfactant to the mix or damage may result.

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BEST AVAILABLE COPY

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INSTRUCTIONS FOR USE

Apply CROAK at the broadcast rate of 1/2 gallon per acre, in 25 to 40 gallons of water per acre. Direct spray to the base of the cotton plants, avoiding the cotton foliage. Apply only when cotton is 3 inches high to first bloom. Best results are obtained when applied to yourg, actively growing weeds at air temperatures above 70°F.

Precaution: Do not make more than two applications of CROAK to the same crop or field in any one year. Do not graze treated fields or feed plants or gin trash from treated areas to livestock. Do not plant crops other than cotton within six months after last application.

Slight burning and a reddish discoloration of the cotton leaf may occur occasionally following treatment with products containing MSMA, but the cotton plants will develop normally.

West Texas Only: Do not use this product on sandy, loamy sand, or fine sandy loam soils.

STORAGE AND DISPOSAL

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

STORAGE INSTRUCTIONS

Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool dry area away from any heat or ignition source. High heat may form volatile arsenic compounds and in the event of extremely high temperatures, such as a warehouse fire, it may decompose and give off poisonous vapors. Do not stack over 2 pallets high. Move containers by handles or in cases. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Keep away from puncture source. Avoid storage near water supplies, food, feed, seed, fungicides, insecticides and fertilizer to avoid contamination. Store in original containers only. If the contents are leaking or the material is spilled, follow these steps while wearing protective clothing:

- Contain spill, absorb with an inert material such as sand or sawdust.
- 2. Collect and place in suitable containers for disposal.
- 3. Wash area with water and soap to remove remaining pesticide.
- Follow washing with clean water rinse.
- Place a leaking container in a plastic tub and transfer contents as soon as possible to an empty original container.
- Do not allow run off to enter sever or contaminate water supplies.
- 7. Dispose of waste as indicated below:



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PESTICIDE DISPOSAL

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

CONTAINER DISPOSAL

Triple rinse (or equivalent). Then offer for recycling, reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Drexel or the seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.