



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

MAY 17 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Barbara Brown  
DREXEL CHEMICAL COMPANY  
BOX 9306  
MEMPHIS, TN 38109

Subject: Label Amendment Submission of 04/06/93 in Response to PR Notice 93-7  
EPA Reg. No. 19713-285  
IDA PROP-A-NEL 4

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.



**Recycled/Recyclable**  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Barbara Brown  
DREXEL CHEMICAL CO  
BOX 9306  
MEMPHIS TN 38109

Comment for: EPA Reg Nr.19713-285  
IDA PROP-A-NEL 4

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

The following statement on your proposed label is not required for this product: "Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate." You may delete it or leave it on the label.

Gloves are not required for applicators and other handlers because the dermal and skin toxicity levels are 4. Please refer to page 17 of the Main Labeling Guidance.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.



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**Drexel Chemical Company**

April 6, 1994

Ida, Inc. Prop A Nel 4  
EPA Reg. No. 19713-285

I certify that the revised labeling being submitted for this product is in complete accordance with the labeling requirements of PR Notice 93-7, which reflects the requirements of EPA's labeling regulations for Worker Protection Statements (40 CFR part 156, subpart K). Where exact language is specified in the PR Notice I have used that language exactly, in the location specified. I further certify that no revisions are being submitted other than those directed by PR Notice 93-7. I understand that it would be a violation of FIFRA if I or my supplemental registrants were to sell or distribute this product after April 21, 1994, without amended labeling complying with the requirements of 40 CFR part 156, subpart K.

*Barbara Brown*

Barbara Brown/Registration Specialist  
DREXEL CHEMICAL COMPANY

The acute toxicity categories (I, II, III, or IV) for this product as entered in blocks 3 - 7 on Part I of the Product Worksheet are:

III Acute oral toxicity  
IV Acute dermal toxicity  
IV Skin irritation potential  
III Eye irritation potential  
IV Acute inhalation toxicity

**BEST AVAILABLE COPY**

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

MAY 17 1994

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

19713-285

IDA, INC.  
PROP A NEL 4  
HERBICIDE

For Postemergent Control Of Broadleaf And Grass Weeds In Rice Fields

ACTIVE INGREDIENTS:

3',4' Dichloropropionanilide . . . . . 43.5%

INERT INGREDIENTS: . . . . . 56.5%

TOTAL: . . . . . 100.0%

This product contains 4 lbs. of 3',4' Dichloropropionanilide per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

~~PRECAUCION-AL-USUARIO:-Si-usted-no-lee-ingles,-no-use-este-producto hasta-que-le-etiqueta-haya-sido-explicado-ampliamente-~~

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 19713-285  
EPA Est. No. 19713-MS-1  
NET CONTENTS:

MANUFACTURED BY:  
DREXEL CHEMICAL COMPANY  
P.O. BOX 9306-MEMPHIS, TN 38190-0306

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Get medical attention.

Contains petroleum distillates.

IF ON SKIN: Wash contaminated areas thoroughly with soap and water.

~~Do not reuse contaminated clothing until washed.~~ Get medical attention if irritation persists.

IF IN EYES: Flush with copious amounts of clean water for 10 to 15 minutes. Get medical attention.

NOTE TO ATTENDING PHYSICIAN: May cause chemical pneumenitis if aspirated. If lavage is performed, suggest endotracheal and/or esophagosopic control.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing spray mist. May cause skin irritation. Avoid contact with skin, eyes, and clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. ~~Be no -apply this-product-in-such-a-manner-as-to-directly-or-through-drift-expose workers-or-other-persons--The-area-being-treated-must-be-vacated-by unprotected-persons-~~

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

Long-sleeved shirt and long pants

Shoes plus socks

Waterproof gloves

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. 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.

**BEST AVAILABLE COPY**

**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**

This pesticide is toxic to fish. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water except as specified on this label. 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 when disposing of equipment washwaters.

**PHYSICAL AND CHEMICAL HAZARDS:**

Do not use or store near heat or open flame.

**GENERAL INFORMATION:**

Several important factors should be taken into account to achieve a high efficiency of selective weed control with propanil. These include uniform application, growth stage and weather conditions. To assure uniform application shake or roll container prior to opening and mix the prescribed amount of product with a sufficient volume of carrier to provide thorough coverage of target area. For aerial applications use approximately 10 gallons, and for surface (ground) applications 20 to 30 gallons carrier per acre at high enough pressure. Agitate tank mixes thoroughly and continuously. Avoid over and under application

Growth stage of weeds is very important. Best results for selective weed control are obtained when most grasses have reached the 1 to 3 leaf stage. Proper field preparation is essential to ascertain a relatively clod free and level surface and to obtain uniform flood levels and growth. Fields may be flushed prior to treatment to produce uniform and vigorous grass germination and growth. Drain water from fields prior to applying product. Higher rates are recommended to control larger grasses or exposed weeds when rice fields are not completely drained. Inspect rice fields regularly to select the correct application time.

Weather conditions must be observed closely. Under cool weather conditions higher rates are required to achieve satisfactory control. Avoid application if rain threatens within 6 to 8 hours, or if wind velocities are high enough to cause drift and irregular spray patterns.

Consult local Extension Service for detailed application advice.

READ ENTIRE LABEL BEFORE USING THIS PRODUCT.

**DIRECTIONS FOR USE**

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

**BEST AVAILABLE COPY**

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), 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 24 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

Shoes plus socks

Waterproof gloves

Do not contaminate water intended for irrigation or domestic purposes. Water drained from treated rice fields must not be used to irrigate other crops or released within  $\frac{1}{2}$  mile upstream of a potable water intake in flowing water (i.e., river, stream, etc.) or within  $\frac{1}{2}$  mile of a potable water intake in a standing body of water such as a lake, pond or reservoir.

Do not apply when weather conditions favor drift from target area. Do not drain water from treated fields into areas where catfish farming is practiced. Do not apply to fields where commercial crayfish farming is practiced and do not drain water from treated fields into areas where crayfish farming is practiced.

**WHERE TO USE:** PROP A NEL 4 is used for postemergent control of broadleaf weeds in RICE fields.

**WEEDS CONTROLLED:** Alligatorweed, barnyardgrass (watergrass), brachiaria, coffeeweed, crabgrass, croton, curly indigo, foxtail, goosegrass, gulf cockspur, mexicanweed, millet (Texas), paragrass, pigweed, sourdock, spearhead, wiregrass.

(This product will not control arrowhead, bermudagrass, cattail, ducksalad, johnsongrass, nutgrass, red rice and sprangletop.)

#### RECOMMENDED BROADCAST RATE

Apply 3 quarts of product per acre when most grasses have reached the 1 to 3 leaf stage. Use 4 to 6 quarts of product per acre if grasses are large (4 to 6 leaf stage) or when unseasonably cool weather conditions prevail or in cases where rice fields have not been drained completely and where weeds are large enough.

Barnyardgrass may be controlled up to 30 to 45 days after planting, before rice plants have reached the fully tillered growth stage.

**BEST AVAILABLE COPY**

Note: Product applied to rice after the 4 leaf stage may cause visible injury under some climatic conditions. Rice plants usually outgrow such injury.

**IN CALIFORNIA ONLY**--Use product where rice fields are not completely drained. If higher water level is desired, reflood field after 12 hours and before 7 days after treatment. This will discourage new weed infestations. Do not apply propanil within 14 days before or after insecticide applications. Serious injury to rice may occur.

Do not apply this product (directly or indirectly) to any crop except rice.

Do not apply when wind conditions will allow drift to adjacent, susceptible crops such as beans, soybeans, cotton, safflower, cucurbits, vegetables, orchards and other sensitive crops.

Do not store near food, feeds, fertilizers, seeds or insecticides. Keep containers closed when not in use.

#### STORAGE AND DISPOSAL

**STORAGE:** Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not store this product near fertilizers, seeds, insecticides, or fungicides. Do not store near heat or open flame. Containers should not be stacked more than four (4) high. Reclose all partially used containers by thoroughly tightening bungs. Damaged or leaking containers which cannot be used immediately should be transferred to suitable sound containers and properly marked. Absorb any spill with a suitable clay absorbant and dispose of as indicated under "Pesticide Disposal."

For safety and prevention of unauthorized use, all pesticides should be stored in locked facilities.

To prevent accidental misuse, different pesticides should be stored in separate areas with enough distance between to provide clear identification.

Opened, partially used pesticides should be stored in original labeled containers when possible. When transfer to another container is necessary because of leakage or damage, carefully mark, and identify contents of the new container.

**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 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:** Triple rinse (or equivalent), adding rinsate to spray tank. 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.

AGRICULTURAL CHEMICAL  
DO NOT SHIP OR STORE WITH FOODS, FEEDS, DRUGS, OR  
CLOTHING.

**BEST AVAILABLE COPY**

#### WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed to be 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.