

34704-382

09/22/2003

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

SEP 22 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Glenda Haage
Platte Chemical Company
7251 W. 4th Street
PO Box 667
Greeley, CO 80632-0667

Dear Ms. Haage:

Subject: Liqui-Stik Concentrate
EPA Registration Number 34704-382
Application dated August 22, 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 the order of the Precautionary Statements to match the order of First Aid statements, and so that the most severe routes of exposure are listed first.
2. Under STORAGE AND DISPOSAL, there are two identical subheadings of "Pesticide Disposal." Change the first subheading to "Pesticide Storage."
3. Change "waterproof gloves" to "chemical resistant gloves made of any waterproof material."
4. Place the phrase "Do not contaminate water, food, or feed by storage and disposal" directly under the heading STORAGE AND DISPOSAL.
5. Change "Airplane Spray" to "Aerial Applications."
6. Insert Spray Drift Management text. See attachment.

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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AND TOXIC SUBSTANCES

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).



LIQUI-STIK CONCENTRATE

GROWTH REGULATOR

For Agricultural or Commercial Use Only

ACTIVE INGREDIENT:	By Wt.
1-Naphthaleneacetic Acid as the ammonium salt*	5.68%
INERT INGREDIENTS:	94.32%
	TOTAL 100.00%

*Equivalent to 5.2% 1-Naphthaleneacetic acid or 200 grams per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION

See below for additional precautionary information.

EPA REG. NO. 34704-382

EPA EST. NO. 5481-CA-1

NET CONTENTS 1 GAL. (3.78 L)

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EXP 08P03

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist.

Personal Protective Equipment:

Applicators and other handlers must wear: long-sleeved shirt and long pants, waterproof gloves and shoes plus socks.

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.

Engineering controls statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets with requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [0 CFR 170.240 (d) (4-6)] the handler PPE requirements may be reduced or modified as specified in the WPS.

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.

FIRST AID

If in eyes:	<ul style="list-style-type: none"> 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:	<ul style="list-style-type: none"> 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:	<ul style="list-style-type: none"> 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.
If swallowed:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have a 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.

FOR A MEDICAL EMERGENCY INVOLVING THIS PRODUCT CALL: 1-800-301-7976. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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 by cleaning of equipment or disposal of wastes. Do not apply when weather conditions favor drift from the areas treated.

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) 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, waterproof gloves and shoes plus socks.

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LIQUI-STIK CONCENTRATE
EPA REG. NO. 34704-382

STORAGE AND DISPOSAL

PESTICIDE DISPOSAL: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers. Do not contaminate other pesticides, fertilizers, water, food, or feed by storage or disposal. In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills.

To confine spill: If liquid, dike surrounding area or absorb with sand, cat litter or commercial clay. Place damaged package in a holding container. Identify contents.

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: Plastic containers: Triple rinse (or equivalent). Then offer for recycling or 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. **Glass Containers:** Triple rinse (or equivalent). Then dispose of in a sanitary landfill or by other approved State and local procedures.

This product is a hormone-like spray to be used in the following manner on apples and pears for the prevention of preharvest fruit drop and thinning of olives. Do not use in undiluted form.

Do not apply this product through any type of irrigation system.

DIRECTIONS FOR APPLES AND PEARS

Spray trees thoroughly, wetting all fruit stems and adjacent leaves. Apply 7 to 14 days before harvest for apples and 5 to 7 days before harvest for pears. This product becomes effective in 2 to 3 days after application and controls drop for 10 days to 4 weeks (less for McIntosh variety) depending on weather conditions. Do not make more than 2 applications and do not delay picking beyond optimum maturity.

GROUND SPRAY: Apples: thoroughly mix 12 fluid ounces with 250 gallons of water (4.8 fluid ounces per 100 gallons water) to prepare a 20 ppm. spray. 630 Gallons per acre of this 20 ppm. spray provides an equivalent of 48 grams of 1-Naphthaleneacetic acid per acre. **Pears:** use a 10 ppm. spray obtained by mixing 12 fluid ounces with 500 gallons of water. 670 Gallons per acre of this 10 ppm. spray provides an equivalent of 25 grams of 1-Naphthaleneacetic acid per acre.

AIRPLANE SPRAY: Apples: Use 30 fluid ounces in 5 gallons of water. **Pears—**Use 11 fluid ounces of this product in 5 gallons of water per acre.

DIRECTIONS FOR THINNING OLIVE TREES

This product is effective in thinning olive trees when an excessively heavy fruit set is expected.

Timing is critical. Spray when young fruits are 1/8 to 3/16 inches in diameter, which is from 1 1/2 to 2 1/2 weeks following full bloom. Thinning is effective on all varieties except Sevillano. **Without Oil.** Apply a solution of 150 ppm. 1-Naphthaleneacetic acid equivalent obtained by adding 9 fluid ounces and a wetting agent (e.g. DREFT® 3 to 4 ounces) to 25 gallons of water. **With Oil.** Apply a solution of 100 ppm. 1-Naphthaleneacetic acid equivalent obtained by mixing thoroughly 6 fluid ounces with 25 gallons of water. Emulsify by agitation with 3 pints of light or medium summer oil. Spray only the heavily loaded trees until the leaves are thoroughly wet. This will require 10 to 30 gallons per tree.

CAUTION: Unless you wish to remove all your fruit, do not apply during bloom.

NOTICE

IT IS IMPOSSIBLE TO ELIMINATE ALL RISKS INHERENTLY ASSOCIATED WITH THE USE OF THIS PRODUCT. CROP INJURY, INEFFECTIVENESS, OR OTHER UNINTENDED CONSEQUENCES MAY RESULT BECAUSE OF SUCH FACTORS AS WEATHER CONDITIONS, PRESENCE OF OTHER MATERIALS, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF PLATTE, THE MANUFACTURER OR SELLER. IN NO CASE SHALL PLATTE, THE MANUFACTURER OR SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER.

EXCEPT AS EXPRESSLY PROVIDED HEREIN, PLATTE, THE MANUFACTURER OR SELLER MAKES NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO, MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND PLATTE'S, THE MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

FORMULATED FOR
PLATTE CHEMICAL CO.

P.O. BOX 667, GREELEY, COLORADO 80632-0667

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 22 2003

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

34704-382