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

MAR 11 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Joanne Pratt
Wilbur Ellis Co.
191 W. Shaw Ave
Fresno, CA 93704

Subject: Label Amendment Submission of 09/10/93 in Response to PR Notice 93-7
EPA Reg. No. 2935-462
TIDE CHLORATE DEFOLIANT

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



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contains at least 50% recycled fiber

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Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

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IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:

Submit the required notification. Then 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 as amended

AND

- **WITHIN** one year from date of this acceptance.

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

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Joanne Pratt
WILBUR ELLIS CO.
191 W SHAW AVE
FRESNO CA 93704.

Comment for: EPA Reg Nr.2935-462
TIDE CHLORATE DEFOLIANT

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

Add the following User Safety Recommendation to the label in the location shown in Section A on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing."

You have incorrect wording in the first paragraph in the Agricultural Use Requirements box on your proposed label. That paragraph must contain the exact wording of the paragraph shown as "2" in Section F on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

You have incorrect wording in the second-to-last sentence in the first paragraph in the Agricultural 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), notification to workers and restricted-entry interval."

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

Correct the typographical errors circled on your proposed label.



TIDE CHLORATE DEFOLIATE

bag 8

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Causes skin irritation. Avoid contact with skin, eyes and clothing. Strong oxidant. Contact with combustible material may cause fire. Clothing and vegetation contaminated with chlorate or its solution are dangerously flammable. Remove clothing and wash thoroughly with water.

Keep children and animals off treated areas.

Do not graze treated areas or feed gin waste to livestock.

Copy B - Add

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.

CHEMICAL HAZARDS

Do not mix with organophosphate type insecticides.

GENERAL INFORMATION

This product has been developed for the defoliation of cotton to permit earlier harvesting. Earlier harvesting of cotton may reduce late insect activity or boll rot.

Copy D - Add

DIRECTIONS FOR USE

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

RE-ENTRY

Do not 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.

DIRECTIONS

MIXING: Auxiliary mixing tank with agitation will assure more thorough mixing of chemical with water and reduce operation time — Do not mix with organophosphate type insecticides.

APPLICATION: Thorough coverage of the plants is essential. A second application may be required under some conditions. When applied by airplane, swath width should not exceed the wing span, altitude and speed of aircraft should be regulated to give best spray coverage. Application should not be attempted during periods of excessive winds, as spray may drift and cause defoliation of adjoining cotton or injury to other crops. Do not apply during very high temperatures found in some areas at midday.

AIRPLANE APPLICATION: When applied by airplane, use 1 to 1-1/2 gallons per acre and add water to make 4 to 7 gallons total solution per acre. Use the lower rate when plants and weather conditions are ideal for defoliation.

GROUND MACHINE APPLICATION: Use 1 to 1-1/2 gallons and add water to make 20 to 30 gallons total solution per acre. With cotton, usually 6 to 8 nozzles per row are necessary to obtain good coverage of all leaves.

FACTORS LIMITING DEFOLIATION OF COTTON: Immature or over-mature plants generally are difficult to defoliate. Defoliation should not be attempted earlier than 30 to 40 days after cut-out (usually 40 days in irrigated areas). In areas where cut-out is not sharply defined, maturity of the plants should be judged by experienced personnel. Uniform defoliation within a field may sometimes be difficult to obtain because of irregular plant maturity.

STRESSED COTTON: Satisfactory defoliation may not be obtained when cotton plants are suffering from lack of moisture or when plant growth is retarded by cold weather.

TIME OF APPLICATION: Apply on cotton 2 to 3 weeks prior to anticipated picking date.

ACTIVE INGREDIENTS:

Sodium Chlorate (NaClO₃) 27.2

INERT INGREDIENTS: 72.8

*Contains 3.0 lbs. sodium chlorate per gallon at 68°F.

**Includes water soluble urea to inhibit the fire hazard of sodium chlorate.

EPA Reg. No. 2935-462

EPA Est. No. 2935-TX-001

KEEP OUT OF REACH OF CHILDREN CAUTION

SEE SIDE PANEL FOR ADDITIONAL REQUIRED
WARNING STATEMENT

FLUSH OUT EQUIPMENT WITH WATER AFTER EACH DAY'S WORK.

STORAGE AND DISPOSAL

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

STORAGE: Do not store in or around the home. Store in a secure, dry and temperate area. Store only in original container. Keep away from heat, sparks or open flame.

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: 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.

ACCEPTED
with COMMENTS
in EPA Letter Dated

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

2935-462

NOTICE: Seller warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, expressed or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

Logo TM of WILBUR-ELLIS Company
IDEAS TO GROW WITH is a registered trademark of WILBUR-ELLIS Company

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COPY B

Personal Protective Equipment
Applicators and other handlers must wear:

- A) Long sleeved shirt
- B) Long pants
- C) Waterproof gloves
- D) 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.

BEST AVAILABLE COPY

COPY D

DIRECTION 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 Protective 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, decontaminations, notification, and emergency assistance. It also contains specific instructions, and exceptions pertaining to protective equipment (PPE). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

missing language

Do not enter or allow workers 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:

- A) Coveralls
- B) Waterproof gloves
- C) Shoes plus socks



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

MAY 31 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

J. Allen Dunlap, III
William M. Mahlburg
Agent for: PLATTE CHEMICAL CO., INC.
P. O. Box 667
Greeley, CO 80632

Subject: Label Amendment Submission of 04/13/94 in Response to PR Notice 93-7
EPA Reg. No. 34704-393
CLEAN CROP C-O-C-S 15 SULFUR 25 DUST

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. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS IS:

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:

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

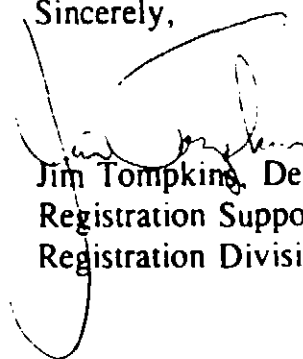
Submit the final printed labeling via the U.S. Postal Service to:

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,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

PROPOSED LABEL



C-O-C-S[®] 15 SULFUR 25 DUST

REGISTERED
COMMENTS
A Letter Dated

MAY 31 1994

Federal Insecticide,
Fungicide, and Rodenticide Act
Registered for the pesticide
under EPA Reg. No.
34294-393

FUNGICIDE

ACTIVE INGREDIENTS:	By Wt.
"Copper" expressed as metallic	15.00%
Sulfur	25.00%
INERT INGREDIENTS:	60.00%
	TOTAL
	100.00%

*From copper oxychloride and basic copper sulfate.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

EPA REG. NO. 34704-393

EPA EST. NO. _____

NET WEIGHT 50 LBS. (22.68 KG)

4066

WPSEX04Y94

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Keep away from domestic animals, feed and food-stuffs. May cause skin sensitization reactions in certain individuals.

Personal Protective Equipment:

Applicators and other handlers must wear: long-sleeved shirt and long pants, water-proof 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 (40 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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. 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. Drift and runoff from treated areas may be hazardous to fish and aquatic organisms in adjacent aquatic sites. Do not allow rinsate from cleaning of equipment or disposed material to enter surface or ground water.

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 (WPS) (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 intervals. The requirements on 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 entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with any surface that has been treated, such as plants, soil, or water's surface: water-proof gloves and shoes plus socks.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: 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, fold and roll back bags, clamp 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. If dry material, cover to prevent dispersal. 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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

C-O-C-S 15 SULFUR 25 DUST is a product containing sulfur and copper oxychloride sulfate, a fixed neutral copper.

Application of material containing sulfur should not be made just prior to or during periods of excessively high temperatures.

GRAPES: Powdery Mildew, Bunch Rots — Use 20 pound per acre. Apply at the time of berries begin to touch and thereafter as needed. For disease control the material must be applied before the disease appears.

Concord and other Labrusca type grapes may be injured by sulfur. Consult your State Agricultural Experiment Station or your State Agricultural Extension Service for additional information consistent with directions on this label.

DEALERS SHOULD SELL IN ORIGINAL PACKAGES ONLY.

NOTICE

PLATTE WARRANTS THAT THIS PRODUCT CONFORMS TO THE CHEMICAL DESCRIPTION ON THE LABEL THEREOF AND IS REASONABLY FIT FOR THE PURPOSES STATED ON SUCH LABEL ONLY WHEN USED IN ACCORDANCE WITH THE DIRECTIONS UNDER NORMAL USE CONDITIONS. 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. IN NO CASE SHALL PLATTE 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 MAKES NO

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