

42519-4

PM-25

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JUN 2 1998

E. M. Bellet, Ph.D.
Consultant / Luxembourg-Pamol, Inc.
5100 Poplar Avenue, Suite 2746
Memphis, TN 38137

Gentlemen:

Subject: Delete "Causes moderate eye irritation"
Cacodylate 3.25
EPA Registration No. 42519-4
Your Submission Dated April 28, 1998.

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

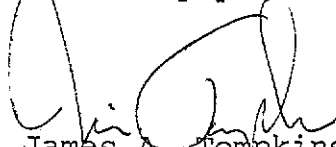
1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- In the Environmental Hazards Section delete "Do not contaminate waters used by animals, wildlife or aquatic life, or water used for domestic or irrigation purposes". Refer to PR Notice 93-8.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

Enclosure:

LUXEMBOURG-PAMOL
Cacodylate 3.25

Effective 7/28/97

For Lawn and Ornamental Turf Use

ACTIVE INGREDIENT:

Sodium Cacodylate	28.4%
Dimethylarsenic Acid (Cacodylic Acid)	4.9%
INERT INGREDIENTS:	66.7%
TOTAL:	100.0%

Total Arsenic (as elemental) all in water soluble form 15.96%

Cacodylate 3.25 contains the equivalent of 3.25 lbs. dimethylarsenic acid per gallon.

Keep Out Of Reach Of Children

CAUTION

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 give anything by mouth to an unconscious person.

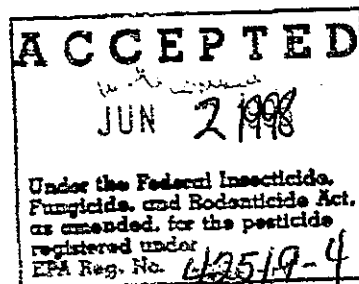
IF IN EYES: Immediately flush eyes with plenty of water. Get medical attention.

IF ON SKIN: Flush with plenty of water. Get medical attention if irritation persists.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No.: 42519-4
EPA Est. No.: 42519-IS-1

Company	Manufactured for:
Logo	LUXEMBOURG-PAMOL, INC.
	5100 Poplar Avenue, Suite 2746
	Memphis, Tennessee 38137, U.S.A.



FOR CHEMICAL SPILL, LEAK,
FIRE OR EXPOSURE CALL TOLL
FREE: 1-800-424-9300

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

DIRECTIONS FOR USE

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

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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

Do not apply this product in a way that will contact workers or other persons, either directly or through spray drift. Only protected handlers may be in the area during application.

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 in 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 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 and socks
 - * protective eyewear
 - * chemical resistant headgear for overhead exposure
-

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 WPS applies when this product is used to produce agricultural plants on farms, nurseries, or greenhouses.

Keep children and domestic animals off treated areas until this material has been washed into the soil.

The area being treated must be vacated by unprotected persons.

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. Freezing point of this product is approximately -5°F. If stored below freezing point, warm to 50°F and agitate thoroughly before using. Containers should not be stacked more than six (6) high. Reclose all partially used containers by thoroughly tightening screw cap. Damaged or leaking containers which cannot be used immediately should be transferred to suitable sound containers and properly marked. Absorb any spills with a suitable clay absorbent 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 incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

PRECAUTIONARY STATEMENTS**CAUTION:****Hazards to Humans and Domestic Animals**

Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes, and clothing. In cases of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation occurs.

Personal Protective Equipment

Applicators and other handlers must wear:

- * Long sleeved shirt and long pants
- * Waterproof gloves
- * Shoes and socks
- * Protective eyewear
- * Chemical resistant apron when cleaning equipment, mixing or loading
- * For exposure in enclosed areas a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval prefix TC-23-C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- * For exposure outdoors a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

Follow manufacturers instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

User should:

- * Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- * Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- * 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

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of equipment washwaters. Do not contaminate waters used by animals, wildlife or aquatic life, or water used for domestic or irrigation purposes. Do not apply when weather conditions favor drift from target area.

GENERAL INFORMATION

Cacodylate 3.25 is designed to kill grasses and weeds. It is non-selective in its herbicidal action. The phytotoxic properties of this material are quickly inactivated on contact with soil. Seed may be planted about 5 days after treatment.

APPLICATION METHODS:

Calculate the area to be treated and prepare the solution accurately. A surface-active (detergent or wetting) agent markedly improves effectiveness of this herbicide. Such a compound may be added in a proportion of 1% by volume of the final spray solution. Dilute Cacodylate 3.25 with the correct volume of water, mix thoroughly, and apply to a measured area using any type of sprayer, according to the following chart.

Cacodylate 3.25 Application Rates

<u>Liquid Measure of Cacodylate 3.25</u>	<u>Add Water to Make</u>	<u>Apply To</u>
1 pint (16 oz.)	4 gallon	825 sq.ft.

Do not feed treated foliage to livestock or graze in treated areas.

LAWN RENOVATION

Apply Cacodylate 3.25 at any time during the growing season; preferably on warm, sunny days when grass is in rapid growth. Cover foliage thoroughly. Average turf will brown and die within five days. Certain weeds and matted turf may require a second treatment. Reapply in five days if necessary. New seed should be applied in about five days after treatment. Do not remove dead stubble unless the matted turf prevents the seed from making soil contact. Water heavily before seeding. Seed at rate indicated for new lawns. Keep area moist.

WEED AND GRASS CONTROL IN NON CROP AREAS

Carefully direct spray to the undesired vegetation along sidewalks, driveways and fences. Whenever necessary, repeat treatment in five days. A repeat treatment usually results in better kill than excessive single dosage. Bermuda grass and certain other deep rooted perennial grasses and weeds may not be killed. Cacodylate 3.25 may be used to kill noxious weeds and grasses near perennial shrubbery, around buildings and other structures, if precautions are used to keep spray from contacting desired vegetation.

CARE OF EQUIPMENT

Wash all spray equipment thoroughly after use to avoid corrosion of metal parts.

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 Luxembourg-Pamol, Inc. or the Seller be liable for consequential, special, or indirect damages resulting from the use 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 Luxembourg-Pamol, Inc. and is accepted as such by the Buyer.

NET CONTENTS:

Manufactured by Luxembourg Industries (PAMOL), Ltd.
Made in Israel