

SEP 14 1993

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

Gentlemen:

Subject: Amended Labeling
Cacodylate 3.1
EPA Registration No. 42519-5 ✓
Your Submission Dated August 16, 1993.

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:

a. Modify the Environmental Hazards Section to include the following statements:

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.

Refer to PR Notice 93-3 and 93-8.

b. In the Precautionary Statements move the Signal Word, CAUTION, below the heading, Hazards to Humans and Domestic Animals.

c. Reinstate the following statements in the hazards to humans and domestic animals section:

May cause irritation of eyes, nose, throat and skin. Wash thoroughly after handling. Remove contaminated clothes and wash before reuse.

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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,

/s/

Cynthia Giles-Parker
Product Manger (22)
Fungicide Herbicide Branch
Registration Division (H7505C)

Enclosure

BEST AVAILABLE COPY

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with this labeling. Do not apply this product through any type of irrigation system.

Wear protective clothing when handling or applying this product including long pants, long sleeve shirt and impermeable gloves and boots. Mixer-loaders should include an apron and full face shield when handling or mixing concentrate. Flagmen should be fully protected during spray operation. or mechanical flagmen used. Pilots and ground spraying applicators should wear mask or respirator approved by the Mining, Environment and Safety Administration and the National Institute for Occupational Safety and Health.

Do not enter treated areas without protective clothing until sprays have been dried.

Use certain states may require more restrictive requirements for various crops treated with this product. Consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Workers should not enter treated fields without protective clothing until sprays have dried. Protective clothing must include hat, long sleeve shirt, long legged pants, impermeable boots, and gloves. In case of accidental exposure, immediately go to an area where all contaminated clothing can be removed, including shoes. Wash all exposed areas with soap and water. Do not reuse contaminated clothing until washed.

When oral warnings are given, warnings shall be given in language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information:

Caution: Area treated with Cocodylate 2.1 on (Date of Application). Do not enter without appropriate protective clothing until sprays have dried.

In the event of accidental exposure, immediately go to an area where all contaminated clothing, including shoes, can be removed. Thoroughly wash all exposed areas, including hair, with soap and water. Do not reuse contaminated clothing until washed.

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 children. Freezing point of this product is approximately 10°F. If stored below freezing and warm to 50°F and agitate thoroughly before using. Containers should not be stacked more than six (6) high. Retain 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. Also, any spills with a suitable clay absorbent and a piece 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 transfer and clearly contents of the new container.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or residual 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:** Trickle traps (or equivalent) should remain to spray tank. They offer for recycling or conditioning or puncture and disposal as 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 case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation occurs. Keep children and domestic animals off treated areas until this material has been washed into the soil. Do not apply to 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. Do not grant treated areas with livestock.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate waters used by wildlife or aquatic life, or water used for domestic or irrigation purposes.

NET CONTENTS

Manufactured by Lusem Group Industries (Pamot) Ltd. Made in Israel

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

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

code 111

GENERAL INFORMATION

Cacodylate 3.1 is used as a harvest aid for the defoliation of cotton. Its phytotoxic properties are quickly inactivated on contact with the soil. It is a combination of a defoliating agent and surfactant. It is desirable to add additional surfactant when using ground application equipment (see applications); none need be added for aerial application.

CARE OF EQUIPMENT:

Although Cacodylate 3.1 is only moderately corrosive, do not apply with any applicator that is lined with zinc, tin, or aluminum.

MIXING INSTRUCTIONS:

Cacodylate 3.1 is completely water soluble. Fill the spray equipment reservoir about half full with water and add the required amount of defoliant with agitation. Finish filling the reservoir with water and apply. After use, clean equipment thoroughly by flushing with water. Do not store spray solution in tank for a prolonged period.

APPLICATIONS:

Cacodylate 3.1 is useful as a harvest aid for the defoliation of irrigated and dryland cotton with aerial or ground application equipment. For the most effective defoliation good coverage of all leaves is essential. Nozzles must be arranged to provide thorough coverage of the foliage. If applied by airplane, use 5 to 10 gallons of water per acre. This range will generally provide adequate coverage. If applied by ground equipment, a spray volume of 15 to 25 gallons of water per acre is preferred. With ground application equipment and at spray volumes of 15 to 25 gallons per acre, add 1/3 to 2/3 pints of Surfac 820 or similar approved non-ionic surfactant. Do not feed treated foliage to live stock or grace treated areas.

DEFOLIATION OF DRYLAND COTTON:

Apply 2 to 2.5 pints of Cacodylate 3.1 per acre when 50% or more of the bolls are open (7 to 10 days prior to anticipated picking).

DEFOLIATION OF IRRIGATED COTTON:

Apply 2.5 to 3 pints of Cacodylate 3.1 per acre when 50% or more of the bolls are

open (7 to 10 days prior to anticipated picking).

TANK-MIX RECOMMENDATIONS:

Cacodylate 3.1 may be tank-mixed with DEF Cotton Defoliant for more consistent defoliation over a wide range of environmental conditions. The combination should be applied when 50% or more of the bolls are open (7 to 10 days prior to anticipated picking). Apply at the rate of 1.6-2.0 pints of Cacodylate 3.1 plus 1.0-1.5 pt/A of DEF Cotton Defoliant.

MIXING INSTRUCTIONS:

If applied aerially, use 5 to 10 gallons of water per acre. This range will generally provide adequate coverage. If applied by ground equipment, a spray volume of 15 to 25 gallons of water per acre is preferred. Do not add additional surfactant when using tank-mix applications. Prior to use read the current EPA registration label of each component of the tank-mix for general directions, caution, and other precautions. Do not exceed recommended label rates for each individual defoliant chemical.

WARRANTY—CONDITIONS OF SALE:

OUR RECOMMENDATIONS FOR USE OF this product are based on field use tests believed reliable and should be followed carefully. It is however impossible to eliminate all risks associated with the use of this product. Because such factors as weather conditions, foreign materials, manner of use for application are all beyond the control of the Seller of this product, such things as crop injury, ineffectiveness or other un-intended consequences may result.

ALL SUCH RISKS ARE ASSUMED BY THE BUYER

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions. Seller makes no other warranties, express or implied, including FITNESS OR MERCHANTABILITY. In no case shall the Seller be liable for consequential, special or incidental damages resulting from the use or handling of this product. The foregoing is a condition of sale by Seller and is accepted as such by the Buyer.