



PM 22
42519-5

FILE

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

MAR 14 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

E. M. BELLET
LUXEMBOURG- PAMOL, INC.
5100 POPLAR AVENUE SUITE 2746
MEMPHIS, TN 38137

Subject: Label Amendment Submission of 09/21/93 in Response to PR Notice 93-7
EPA Reg. No. 42519-5
LUXEMBOURG-PAMOL CACODYLATE 3.1

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

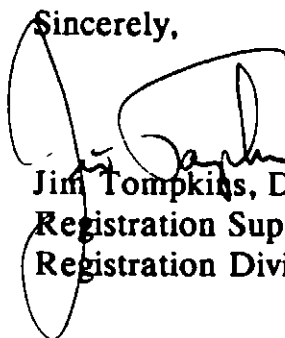
Submit the final printed labeling via the U.S. Postal Service to:

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,

A handwritten signature in black ink, appearing to read "Jim Tompkins", is written over the typed name and title.

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

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

E. M. BELLET
LUXEMBOURG-PAMOL, INC.
5100 POPLAR AVENUE SUITE 2746
MEMPHIS TN 38137.

Comment for: EPA Reg Nr.42519-5
LUXEMBOURG PAMOL CACODYLATE 3.1

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 I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Add the following User Safety Recommendation to the label in the location shown in Section A on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "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."

Remove the statement "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." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

The headgear requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Chemical-resistant headgear for overhead exposure." The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

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

**LUXEMBOURG-PAMOL
CACODYLATE 3.1**

Sodium Cacodylate and Cacodylic Acid Liquid Plus Surfactant For Use As A Defoliant For Irrigated and Dryland Cotton

ACTIVE INGREDIENTS:

Sodium Cacodylate 27.24%

Dimethylarsinic Acid (Cacodylic Acid) 4.70%

INERT INGREDIENTS 68.06%

TOTAL 100.00%

Total Arsenic (as elemental) all in water soluble form 15.34%

Product Contains 3.10 lbs. Cacodylic Acid Equivalent 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 induce vomiting or give anything by mouth to an unconscious person.

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

IF ON SKIN: Immediately wash skin with plenty of soap and water while removing contaminated clothing and shoes. If irritation develops, seek medical attention.

IF INHALED: Remove victim to fresh air.

See Side Panel For Additional Precautionary Statements.

EPA Reg. No. 42519-5

EPA Est. No. 42519-IS-1

Company
Logo

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

BEST AVAILABLE COPY

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

MAR 14 1991

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
42519-5

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.

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 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.

Do not enter or allow worker 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:

- coveralls
- waterproof gloves
- chemical resistant footwear plus socks
- protective eyewear

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, forest, nurseries, or greenhouses."

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

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

BEST AVAILABLE COPY

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**

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
- Chemical resistant footwear plus 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.

BEST AVAILABLE COPY

User Safety Recommendations

Users should:

- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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 animals, wildlife or aquatic life, or water used for domestic or irrigation purposes.

NET CONTENTS:

Manufactured by Luxembourg Industries (Pamol) Ltd.
Made in Israel

BEST AVAILABLE COPY

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 application); 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 dry land cotton with serial 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 Surfak 820 or similar approved non-ionic surfactant.

DEFOLIATION OF DRY LAND 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 pt/A Cacodylate 3.1 plus 1.0-1.5 pt/A of DEF.

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 or oils when using tank-mix applications.

Prior to use read the current EPA registered label of each component of the tank-mix for general directions, caution, and existing precautions. Do not exceed recommended label rates for each individual defoliating chemical.

WARRANTY-CONDITION OF SALE:

OUR RECOMMENDATIONS FOR USE of this product are based on field use and tests believed reliable and should be followed carefully. It is however impossible to eliminate all risks associated with use of this product. Because such factors as weather conditions, foreign material and 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 purposes 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 indirect 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.

BEST AVAILABLE COPY