

SEP 28 1993

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

Gentlemen:

Subject: Revised Confidential Statement of Formula and Labeling
Sodium Cacodylate Solution
EPA Registration No. 42519-8
Your Letter Dated *August 12, 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. Since this is a Manufacturing Use Product update the Environmental Hazards Statement to read as follows:

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the Environmental Protection Agency.

b. On the same line as "Total Arsenic (as elemental) all in water soluble form" reinstate "16.3%".

c. In the Hazards to Humans section since this product is for formulating use only, delete "spray mist" and replace with "vapor". Also, delete "Keep children and domestic animals off treated areas until washed into the soil".

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.

The revised basic formula dated 8/16/92 is acceptable and has been included in the files for this product. It supersedes all previously accepted ones.

Sincerely yours,



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

Enclosure

3 of 5

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 28 1993

LUXEMBOURG-PAMOL
SODIUM CACODYLATE SOLUTION
FOR USE IN FORMULATING OF
HERBICIDES ONLY

Under the Federal Insecticide
and Fungicide Act
of 1947, this pesticide
is registered under EPA Reg. No.

42519-8

ACTIVE INGREDIENTS:

Sodium Cacodylate 29.0%
Cacodylic Acid 5.0%

INERT INGREDIENTS:

TOTAL

66.0%
100.0%

Total Arsenic (as elemental) all in water soluble form
Product contains 3.25 lbs. cacodylic acid equivalent per gallon.

16.3%

EPA Registration No. 42519-8
EPA Establishment No. 42519-IS-1

KEEP OUT OF REACH OF CHILDREN

CAUTION-CAUCION

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not give anything by mouth to an unconscious person. Get medical attention.

If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

If in Eyes: Flush eyes with plenty of water. Call a physician if irritation persists. Get medical attention.

If Inhaled: Remove victim to fresh air. Apply artificial respiration preferably by mouth-to-mouth, if indicated.

PRECAUTIONARY STATEMENTS - CAUTION
Hazards to Humans and Domestic Animals

Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contact with skin, eyes, and clothing. Causes eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and domestic animals off treated areas until washed into the soil.

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.

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. 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 absorbant 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, 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), disposing of rinsate according to PESTICIDE DISPOSAL section. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

INSTRUCTIONS FOR FORMULATION

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

This pesticide may be used only for the formulation of a herbicide for use on cotton, turf or rights of way.

Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

5 of 5

CONDITIONS OF SALE AND WARRANTY

Follow directions carefully. Buyer assumes all risks of storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Pamol be liable for consequential, special or indirect damages resulting from the handling or storage of this product when such storage 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.

A G R I C U L T U R A L C H E M I C A L
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

NET CONTENTS: 30 Gallons/113.25 liters

MANUFACTURED FOR:

LUXEMBOURG-PAMOL, INC.
5100 Poplar Avenue, Suite 2746
Memphis, Tennessee 38137 USA

MADE BY
LUXEMBOURG INDUSTRIES (PAMOL) LTD.

MADE IN
ISRAEL

