



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

MAR 14 1994

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 09/21/93 in Response to PR Notice 93-7
EPA Reg. No. 42519-10
BOLLS-EYE COTTON DEFOLIANT

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.

BEST AVAILABLE COPY



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

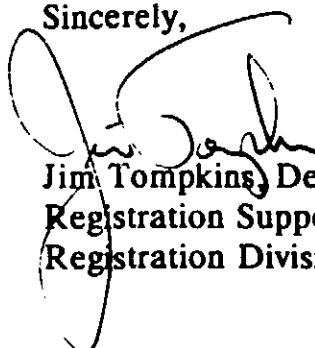
Submit the final printed labeling via the U.S. Postal Service to:

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

BEST AVAILABLE COPY

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.42519-10
BOLLS-EYE COTTON 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 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.

BEST AVAILABLE COPY

**LUXEMBOURG-PAMOL
LEAF-ALL**

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

ACTIVE INGREDIENTS:

Sodium Cacodylate	27.4%
Dimethylarsinic Acid (Cacodylic Acid)	4.7%
INERT INGREDIENTS	67.9%
TOTAL	100.0%
Total Arsenic (as elemental) all in water soluble form	15.4%

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 of Poison Control Center. Drink one or two 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. Get medical attention.

IF ON SKIN: Wash contaminated areas thoroughly with soap and water. Get medical attention if irritation develops.

IF IN EYES: Flush with copious amounts of clean water for 10-15 minutes. Get medical attention. See Side Panel For Additional Precautionary Statements.

EPA Reg. No. 42519-10
EPA Est. No. 42519-IS-1



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 1994
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
42519-10

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.

AGRICULTURAL CHEMICAL

**DO NOT SHIP OR STORE WITH FOODS,
FEEDS, DRUGS OR CLOTHING**

BEST AVAILABLE COPY

**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.

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 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:

LEAF-ALL Cotton defoliant is useful as a harvest aid for the defoliation of irrigated and dry land cotton with aerial or ground application equipment. The phytotoxic properties are quickly inactivated on contact with 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. 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 applicator equipment and at spray volumes of 15 to 25 gallons per acre add 1/3 to 2/3 pints of MULTIFILM X-77 or similar approved non-ionic surfactant.

CARE OF EQUIPMENT: Although LEAF-ALL Cotton Defoliant is only moderately corrosive do not apply with any applicator that is lined with zinc, tin or aluminum.

MIXING INSTRUCTIONS: LEAF-ALL Cotton Defoliant is completely water soluble. Fill the spray equipment reservoir with approximately one half of the amount of water to be used. 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

DEFOLIATION OF DRY LAND COTTON: Apply 2 to 2.5 pints of LEAF-ALL Cotton Defoliant 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 LEAF-ALL Cotton Defoliant per acre when 50% or more of the bolls are open (7 to 10 days prior to anticipated picking).

TANK-MIX RECOMMENDATIONS: LEAF-ALL Cotton Defoliant 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 1/2 to 2 pints per acre of LEAF-ALL plus 1 to 1 1/2 pints per acre of DEF.

WARRANTY AND CONDITIONS OF SALE:

LUXEMBOURG-PAMOL, INC. AND SELLER OFFER THIS PRODUCT AND THE BUYER AND USER ACCEPTS THIS PRODUCT UNDER THE FOLLOWING AGREED CONDITIONS OF SALE AND WARRANT.

The directions for use of this product are believed to be reliable and should be followed carefully. However, it is impossible to take into account all variables and eliminate all risks associated with its use. Injury or damage may result because of conditions which are beyond the control of Luxembourg-Pamol, Inc. or the Seller. Luxembourg-Pamol, Inc. warrants only that this product conforms to the chemical description on the label and is believed to be reasonably fit for purposes referred to in the Directions for Use when used as directed under normal conditions. Luxembourg-Pamol, Inc. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. In no case shall Luxembourg-Pamol, Inc. or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. Any variation of exception from this warranty must be in writing and signed by an authorized Luxembourg-Pamol, Inc. representative.

BEST AVAILABLE COPY