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

MAR 18 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 9/21/93 Response to PR Notice 93-7
EPA Reg. No. 42519-11
LUXEMBOURG-PAMOL CACODYLATE ^ 48

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

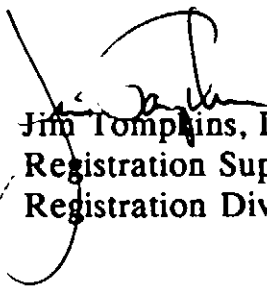
Submit the final printed labeling via the U.S. Postal Service to:

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,



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

Attachment

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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.42519-11
LUXEMBOURG-PAMOL CACODYLATE 2.48

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.

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**LUXEMBOURG-PAMOL
CACODYLATE 2.48**

**Sodium Cacodylate and Cacodylic Acid Liquid Plus Surfactant for General Post-Emergent
Weed Control**

ACTIVE INGREDIENTS:

Sodium Cacodylate 22.7%

Dimethylarsinic Acid (Cacodylic Acid) 3.9%

INERT INGREDIENTS: 73.4%

TOTAL 100.0%

Total Arsenic (as elemental) all in water soluble form 12.8%

Product Contains 2.48 lb. 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 give anything by mouth to an unconscious person.

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.

Logo

EPA Reg. No. 42519-11

EPA Est. No. 42519-IS-1

Manufactured for:

LUXEMBOURG-PAMOL, INC.

5100 Poplar Avenue, suite 2746

Memphis, Tennessee 38137, U.S.A.

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 18 1994
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
42519-11

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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 for 24 hours after treatment. Do not track from treated to untreated areas. 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**

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6 7 8

**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.

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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.

Do not apply when weather conditions favor drift from other areas.

NET CONTENTS:

Manufactured by Luxembourg Industries (Pamol) Ltd.

Made in Israel

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GENERAL INFORMATION

CACODYLATE 2.48 Herbicide is useful for general post-emergent weed control. It is non-selective in its action. The phytotoxic properties of the active ingredient are quickly inactivated on contact with soil. This formulation contains a surfactant. It is unnecessary to add any other surfactant to the spray solution. Best results are obtained on young actively growing weeds. CACODYLATE 2.48 produces top-kill only, therefore, repeat applications are required for season long weed control of perennials.

Mixing Instructions: CACODYLATE 2.48 Herbicide is completely water soluble. Any spray equipment that gives good coverage may be used. Fill the spray tank with approximately one half the amount of water to be used then add the required amount of herbicide with agitation. Finish filling the tank with water and apply. After use, clean equipment thoroughly by flushing with water. Do not store spray solution in tank for a prolonged period. Although CACODYLATE 2.48 Herbicide is only moderately corrosive, do not use in galvanized or aluminum equipment.

APPLICATIONS

NON-CROP: CACODYLATE 2.48 Herbicide is useful for general weed control on drainage ditchbanks and rights-of-way, along sidewalks, driveways and fences, around buildings and ornamentals, and on similar non-crop areas. Mix 1 to 2 gallons of CACODYLATE 2.48 Herbicide in 100 gallons of water. Spray unwanted vegetation to just short of run-off. If regrowth occurs reapply as required.

Do not allow spray to come in contact with foliage, green bark, grafted unions, or scuffed, damaged or broken bark when spraying around trees and ornamentals.

AGRICULTURAL PLANTS-CITRUS (Except Florida): CACODYLATE 2.48 Herbicide is useful as directed application in non-bearing citrus orchards such as orange, grapefruit, tangerine, lemon and lime orchards. It should be applied at the rate of 1 1/2 to 2 gallons per acre.

Mix 1 to 2 gallons of CACODYLATE 2.48 Herbicide in 50 to 100 gallons of water. Apply as a directed spray in interspaces and around base of trees. Spray unwanted vegetation to just short of run-off. If regrowth occurs, reapply as required. However, do not exceed 3 applications per year. Do not allow spray solution to contact leaves, stems or bark. Use a shield if necessary, for nursery plantings or young trees. Do not apply around trees from which fruit will be harvested within one year of treatment.

LAWN RENOVATION: Mow lawn to about 1 inch high before treatment. Mix 10 fluid ounces of CACODYLATE 2.48 Herbicide in 4 gallons of water and apply to 1,000 sq. ft. Spray foliage thoroughly, preferably on a warm sunny day. Bermudagrass and other deep rooted perennials, or partially sprayed foliage, may require a second treatment. Reapply five days later if green areas remain.

When foliage is all brown, matted areas should be raked to remove dead vegetation. The lawn may then be reestablished according to local practice.

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 WARRANTY.

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 condition. 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 or exception from this warranty must be in writing and signed by an authorized Luxembourg-Pamol, Inc. representative.

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