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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 31 1995

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OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Gentlemen:

Subject: Revised Labeling
Luxembourg-Pamol - DSMA 81-P
EPA Registration No. 42519-7
Luxembourg-Pamol Cacodylate 2.48
EPA Registration No. 42519-11 ✓
Your Submission Dated October 1, 1994

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:

Update the Environmental Hazards "Do not contaminate water.." statement to read "Do not contaminate water by disposal of equipment washwaters."

2. For EPA Reg. No. 42519-7, Under the heading **LAWNS AND ORNAMENTALS TURF** correct sentence to read "mix 1.5 ounces of DSMA....apply to an area of 1000 sq. ft."

3. Submit one (1) copy of your final printed labeling before you release the products for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

/s/
Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

BEST AVAILABLE COPY

LUXEMBOURG-PAMOL

Effective 9/8/94

Cacodylate 2.48

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

ACTIVE INGREDIENT:

Sodium Cacodylate 22.7%

Dimethylarsenic 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 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 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
to 15 minutes. Get medical attention.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

ACCEPTED
with COMMENTS
In EPA Letter Dated:

EPA Reg. No.: 42519-11

EPA Est. No.: 42519-IS-1

Company _____ Manufactured for:
Logo _____ LUXEMBOURG-PAMOL, INC.
5100 Poplar Avenue, Suite 2746
Memphis, Tennessee 38137, U.S.A.

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
registered for the pesticide
registered under EPA Reg. No.

42519-11

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

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

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.

Do not apply this product in a way that will contact workers or other persons, either directly or through spray drift. Only protected handlers may be in the area during application.

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 enter or allow worker entry into treated areas during 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
 - * shoes and socks
 - * protective eyewear
 - * chemical resistant headgear for overhead exposure
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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, nurseries, or greenhouses.

Keep children and domestic animals off treated areas for 24 hours after treatment. Do not track from treated to untreated areas.

The area being treated must be vacated by unprotected persons.

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
- * Shoes and 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

User should:

- * Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
 - * Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
 - * 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.
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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 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. Do not apply when weather conditions favor drift from the target area.

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. 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-ways, 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 tree 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 1½ to 2 gallons per acre.

Mix 1 to 2 gallons of Cacodylate 2.48 Herbicide in 50 to 100 gallons of water. Apply as directed spray in interspaces and around base of trees. Spray unwanted vegetation just short of run-off. If regrowth occurs, reapply as required. However, do not exceed 3 applications per year. Do not allow spray solutions 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 square feet. 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 - CONDITION 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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