

PM 23 45639-89

1 of 6

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

21 MAY 1993

Nang-Ly Chow, Ph.D.
NOR-AM Chemical Company
Little Falls Centre One
2711 Centerville Road
Wilmington, DE 19808

Dear Dr. Chow:

Subject: Revised Label - Reduce Application Rates in Tank Mix
DROPP 50WP
EPA Registration No. 45639-89
Your Submission Dated April 28, 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) Due to new EPA policy, part of the Environmental Hazards section has been changed. To comply, change the sentence "Do not apply to water or wetlands (swamps, bogs, marshes and potholes)" to read "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark."
- 2) According to its label, FOLEX 6 EC is not registered for use in California or Arizona. Therefore, these states should be deleted from the beginning of the section for the recommended tank mix with this product. A second statement, allowing use in California and Arizona for DEF 6 only, is acceptable.
- 3) At the end of the section for tank mix with DEF 6 or FOLEX 6 EC, a statement instructs the user to refer to the labeling of DEF 6 "and/or" FOLEX 6 EC. Since these are considered to be separate registrations, the statement should be revised to instruct the user to refer to the labeling of DEF 6 "and" FOLEX 6 EC.

A stamped copy is enclosed for your records. Please submit five (5) final printed copies for the referenced label, incorporating the above changes, before releasing the product for shipment.

CONCURRENCES

SYMBOL	H7505C						
SURNAME	D. KENNY						
DATE	5/21/93						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2046

Note that this acceptance of your label does not relieve you of your obligation to comply with the Worker Protection Standard (WPS). If any of your products are covered by the WPS, you are required to submit, and receive the Agency's approval by April 21, 1994, of a revised label reflecting the required label statements of 40 CFR 156, published in the FEDERAL REGISTER on August 21, 1992 (57 FR 38102). Further guidance will be issued. According to 40 CFR 156, subpart K, specifically § 156.200(c)(3): "No product to which this subpart applies shall be distributed or sold without amended labeling by any registrant after April 21, 1994."

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

PH23

45639-89

3946

SPECIMEN LABEL

ACCEPTED
with COMMENTS
in EPA Letter Dated

21 MAY 1993

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

45639-89

FOR AGRICULTURAL USE ONLY

Drop[®] 50WP

COTTON DEFOLIANT

Packed in Water Soluble Bags

ACTIVE INGREDIENT: Thidiazuron
'N-phenyl-N'-1,2,3-thiadiazol-5-ylurea
INERT INGREDIENTS

15%
5%
Total 100%

EPA Reg. No. 45639-89

EPA Est. No. 33689-WG-1

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este
producto hasta que la etiqueta haya sido explicada
ampliamente.

KEEP OUT OF REACH OF CHILDREN

CAUTION — CAUCION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED:

IF INHALED:

IF IN EYES:

IF ON SKIN:

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS

NOR-AM

NET CONTENTS

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if Swallowed, Inhaled, or Absorbed Through the Skin. Avoid Breathing Spray Mist. Avoid Contact with Skin, Eyes, and Clothing. Do Not Contaminate Food or Feedstuffs.

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.

ENVIRONMENTAL HAZARDS

Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water when disposing of equipment washwaters. Do not apply when weather conditions favor drift from target area.

STORAGE AND DISPOSAL

STORAGE: Do not store box under wet conditions. Handle box carefully when stored at temperatures of less than 50°F to avoid breakage of soluble bags.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty box into application equipment. Then dispose of empty box in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

DO NOT REUSE EMPTY CONTAINER.

IN CASE OF FIRE, LEAKY OR DAMAGED CONTAINERS, OR OTHER EMERGENCY, REPORT AT ONCE BY TOLL-FREE TELEPHONE TO: 800-424-8300.

GENERAL INFORMATION

DROPP® 50WP cotton defoliant is used for removal of leaves prior to harvesting. DROPP disperses easily in water and can be used in any ground and aircraft equipment designed for application of wettable powders. It may take several days before the effect of DROPP becomes noticeable. Adverse conditions, such as low temperatures, may require higher dosages and/or longer times for more complete defoliation. DROPP inhibits regrowth after defoliation and thus reduces staining of lint during harvesting and ginning.

USE PRECAUTIONS:

Do not apply this product through any type of irrigation system.

DO NOT ALLOW SPRAY DRIFT TO CONTACT CROPS OTHER THAN MATURE COTTON OR COTTON WHICH YOU DESIRE TO DEFOLIATE.

Particular care should be taken when applying DROPP 50WP adjacent to lettuce, citrus, or cantaloupe. Tank mixes with organophosphates may increase non-target crop phytotoxicity.

Rainfall within 24 hours after application will reduce the effectiveness of DROPP. Use only freshly prepared sprays. Do not store spray mixture overnight. Do not feed foliage from treated cotton plants or gin trash to livestock.

Do not plant small grain, sorghum, corn or root crops earlier than two weeks after application of DROPP. Do not plant legumes, alfalfa or leafy vegetables earlier than two months after application of DROPP. Do not plant lettuce or carrots earlier than nine (9) months after application of DROPP 50WP. Do not use immature crops for food or feed.

DIRECTIONS FOR USE

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

REENTRY STATEMENT: Reentry into treated areas is prohibited until leaves are completely dry or until 24 hours after application.

Do not enter treated areas without protective clothing.

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. (Indicate specific oral warnings which inform workers of areas or fields that may not be entered without specific protective clothing, period of time field must be vacated and appropriate actions to take in case of accidental exposure.) When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information:

CAUTION: Area treated with DROPP® 50WP on (date of application). Do not enter without appropriate protective clothing for 24 hours or until leaves are completely dry. In case of accidental exposure see Statement of Practical Treatment on the label.

Refer to any applicable supplemental labeling for important additional use directions. Supplemental labeling must be in the possession of the user at the time of application.

TIME OF APPLICATION: Apply DROPP 50WP cotton defoliant only to mature cotton plants when 60-70% or more of the bolls are open, and the remaining bolls are determined to be mature.

A boll is mature when it is too hard to be dented when squeezed between thumb and fingers, too hard to be sliced with a sharp knife, and when the seed coat becomes light brown in color.

Apply DROPP 50WP at least 5 days prior to anticipated harvest.

NOTE: Good defoliation with DROPP is dependent upon three factors:

1. High air temperature
2. High humidity
3. High moisture content in leaf of cotton plant

Use of DROPP 50WP when nighttime temperatures are expected to fall below 60°F can result in less than desirable defoliation and/or regrowth inhibition.

Performance of DROPP 50WP alone or in tank mixes is variable under low temperatures. Ideally, nighttime temperatures 2-3 days following application should be above 60°F or total defoliation and regrowth inhibition can be reduced. Use of DROPP 50WP on heat and drought-stressed cotton (low leaf moisture, thick cuticle, etc.) may result in less than satisfactory defoliation and regrowth inhibition.

USE OF ADJUVANTS (CROP OILS): The use of adjuvants such as petroleum-based crop oils or penetrating oils approved for use on growing crops have been shown to improve performance during low nighttime temperatures (60-65°F) or when defoliating drought-stressed cotton. Refer to specific adjuvant label for rate recommendations.

The use of adjuvants are recommended when applying DROPP 50WP in the desert Southwest (i.e., Arizona and California).

CAUTION: The addition of adjuvants can cause desiccation and/or leaf freezing during periods of high temperatures. Compounds that desiccate leaf tissue are not recommended.

MIXING INSTRUCTIONS: Fill the spray tank with one-half of the total amount of water to be used. After opening each box to be used, open its foil liner. Immediately dump the entire contents of the required number of boxes of soluble bags into

BEST AVAILABLE COPY

the mix tank. Fill the tank with the additional quantity of water required and then start the agitator. Use entire contents of each box.

TANK MIX ADJUVANTS: When using tank mixes of DROPP 50WP and organophosphates, the use of a surfactant or compatibility agent is recommended to improve tank clean-out and overall defoliation. Prior to mixing in the spray tank, a small scale compatibility test should be conducted.

Use only products which are exempt from tolerance under 40 CFR 180.1001.

Always follow the mixing instructions on the label of the appropriate adjuvant.

APPLICATION: Use the specified dosage of DROPP 50WP cotton defoliant in sufficient amount of water to give complete coverage of the foliage with uniform wetting of leaf surfaces. Agitate the spray mix during application.

DOSAGE: One box (5 x 1 lb bags) of DROPP treats 12.5-25 acres (0.2-0.4 lbs DROPP per acre). Apply in 10-25 gallons of spray per acre by ground equipment and 2-10 gallons per acre by air. Use the higher rates during periods of low temperatures (60-65°).

Two applications not exceeding a total of 1 box per 8.3 acres (0.6 lbs/acre) may be necessary to defoliate rank cotton.

BOTTOM DEFOLIATION FOR USE IN ARIZONA ONLY: DROPP 50WP may be used as an aid to improve air circulation and help reduce boll rot caused by moisture.

Apply DROPP 50WP at 0.1 lbs. formulated product per acre in 10-25 gallons of water per acre.

Application to bottom 1/3 of plant only recommended.

Timing of application should be based upon the latest date when ground application equipment can enter the field without crop damage.

PRE-CONDITIONING FOR USE IN ARIZONA AND CALIFORNIA ONLY: DROPP 50WP may be used as a pre-conditioner to enhance the activity of a defoliant application.

Apply DROPP 50WP at 0.1-0.2 lbs. formulated product per acre. Apply in 10-25 gallons of water per acre by ground application or 2-10 gallons of water per acre by aerial application.

Timing of application is recommended to be 7-14 days prior to the use of another defoliant. Refer to the second product label prior to use for complete recommendations.

TANK MIX OF DROPP 50WP PLUS PREP(*)

The tank mix of DROPP 50WP + Prep is recommended to improve overall defoliation, and as an aid in accelerating the opening of mature unopened cotton bolls. Best activity will be obtained where the tank mix is applied to mature cotton plants with 60% open bolls and the remaining bolls are determined to be mature (See Time Of Application section of this label). Do not apply tank mix before sufficient unopened bolls have matured to produce the desired cotton yield. If nighttime temperatures are expected to fall below 60°F, unsatisfactory defoliation and regrowth inhibition may result. Certified cotton seed producers should determine boll and seed maturity prior to treatment.

Apply DROPP 50WP at a rate of 0.1-0.4 lbs. formulated product plus Prep at 1.0-2.0 lbs. active ingredient per acre. Higher rate of DROPP should be used where excessive regrowth is anticipated, or during cooler temperatures.

Apply as a dilute spray as follows:

Application	Gal.	Water/Acre
Aerial		3 - 10
Ground		10 - 50

TANK MIX OF DROPP 50WP PLUS DEF 6(*) OR DROPP 50WP PLUS FOLEX 6 EC(*) FOR USE IN LA., MS., ARK., CA., AZ., ALA., GA., NC., SC., TN., TX. ONLY: The tank mix of DROPP 50WP and DEF 6 or FOLEX 6 EC is recommended to improve defoliation and inhibit regrowth under less than ideal conditions. Less than ideal conditions are those when

the nighttime temperatures are expected to be 60°F on the date of application and for three days following application. Best activity will be obtained when the tank mix is applied to mature cotton plants with 60% or more open bolls.

RATE OF APPLICATION

DROPP 50WP + DEF 6 = Use 0.1-1.4 lbs

DROPP 50WP + 0.5-2.0 pints DEF 6

DROPP 50WP + FOLEX 6 EC = Use 0.1-0.4 lbs

DROPP 50WP + 0.5-2.0 pints FOLEX 6 EC

Higher rate of DROPP 50WP should be used where excessive regrowth is anticipated.

Maximum rates of DROPP and phosphate defoliants applied in a tank mix during very high air temperatures can cause desiccation.

Use lower rate of DEF 6 or FOLEX 6 EC under ideal nighttime temperature conditions (65°F); higher rate during less than ideal or adverse conditions.

Apply as a dilute spray in 5-10 gallons of water per acre by air or 10-25 gallons of water per acre with ground equipment.

When applying DEF 6 or FOLEX 6 EC defoliant plus DROPP 50WP as a tank mix, the following mixing sequence is recommended:

1. Add required water to spray tank, agitate
2. Add DROPP 50WP according to label directions (see mixing instructions)
3. Add DEF 6 or FOLEX 6 EC according to rate desired after the DROPP 50WP has completely dispersed.

A second application of the labeled tank mix may be made where necessary.

Refer to DEF 6 and/or FOLEX 6 EC labeling for additional use directions and cautions when using tank mixtures of DROPP 50WP and those products.

DO NOT USE TANK MIX OF DROPP 50WP PLUS DEF 6 OR FOLEX 6 EC IN THE RIO GRANDE VALLEY COUNTIES OF STARR, HIDALGO, WILLACY, AND CAMERON.

IMPORTANT

CLEAN-OUT INSTRUCTIONS

Tank mixes of DROPP 50WP with organophosphates may form a residue in application equipment. While still fresh and moist, this residue can be removed by flushing the entire system with a commercial tank cleaner. We have found that tank cleaners such as Cleaner Concentrate manufactured by Valco Chemical Division of Harlingen, Texas and Tank and Equipment Cleaner manufactured by Loveland Industries, Inc. of Greeley Colorado, are effective for removing these fresh residues.

Do not allow the spray solution to dry in the application equipment. Immediately following application, clean all equipment (mix tanks, pumps, transfer lines, application tanks, sumps, booms, nozzles and all related equipment) thoroughly with cleaner and water.

Should small quantities of DROPP 50WP remain in inadequately cleaned tanks, they may be released during subsequent applications and may cause damage to crops. NORAM Chemical Company accepts no liability for damage to crops due to inadequately cleaned tanks.

Sequential Application Precaution

Do not apply sequential applications of DROPP 50WP following any defoliant or desiccant except DROPP 50WP used alone or DROPP 50WP tank mixes. Reduced activity of the second treatment will result.

**In limited trials, these cleaners have shown promise in cleaning dried tank residues. The procedure for removing dried residues requires allowing the diluted cleaning solution to stand in equipment, filled to capacity, for 7 days followed by thorough flushing.

*Prep is a trademark of Rhone-Poulenc, Inc.

DEF 6 is a registered trademark of Mobay Chemical Corporation, Agricultural Chemical Division.

FOLEX 6 EC is a registered trademark of Rhone-Poulenc, Inc., Agrochemical Division.

6076

IMPORTANT: READ BEFORE USE

By using this product, user or buyer accepts the following conditions, warranty, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, because of extreme weather and soil conditions, manner of use and other factors beyond NOR-AM Chemical Company's control, it is impossible for NOR-AM to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED, OR MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, WHICH EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of NOR-AM Chemical Company is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. UNDER NO CIRCUMSTANCES SHALL NOR-AM CHEMICAL COMPANY BE LIABLE FOR ANY SPECIAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES, OR DAMAGE RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT NOR-AM'S ELECTION, THE REPLACEMENT OF PRODUCT.

© NOR-AM Chemical Company, 1991

BEST AVAILABLE COPY

NOR-AM
NOR-AM CHEMICAL COMPANY
A Schering-Plough Company

AGRI-BUSINESS DIVISION
Little Falls Centre One
2711 Centerville Road
Wilmington, DE 19808

