

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 23 1995

Nang-Ly Chow, Ph.D.  
AgrEvo USA Company  
Little Falls Centre One  
2711 Centerville Road  
Wilmington, DE 19808

Dear Dr. Chow:

Subject: Revised Labeling - Revised Drift Precautions  
Dropp 50WP  
EPA Registration No. 45639-89  
Your Submission Dated February 9, 1995

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) Add the appropriate Net Contents statement.
- 2) Delete the word "CAUTION" that appears in connection with the precautions for use of adjuvants. Since "DANGER" is the appropriate signal word for this product, and "CAUTION" is also a signal word used to indicate a different toxicity category, confusion may be caused with the user regarding the toxicity of this product. It may be replaced, however, with words such as "PRECAUTION" or "NOTE" that may draw the user's attention but would not be confused with a toxicity category.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

Joanne I. Miller  
Product Manager (23)  
Fungicide-Herbicide Branch  
Registration Division (7505C)

Enclosure

DK: 805-7596: FHB/PM23		CONCURRENCES					
SYMBOL	7505C						
SURNAME	D. KENNY						
DATE	5/23/95						



Special

A company of Hoechst and NOR-AM

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

MAY 23 1995

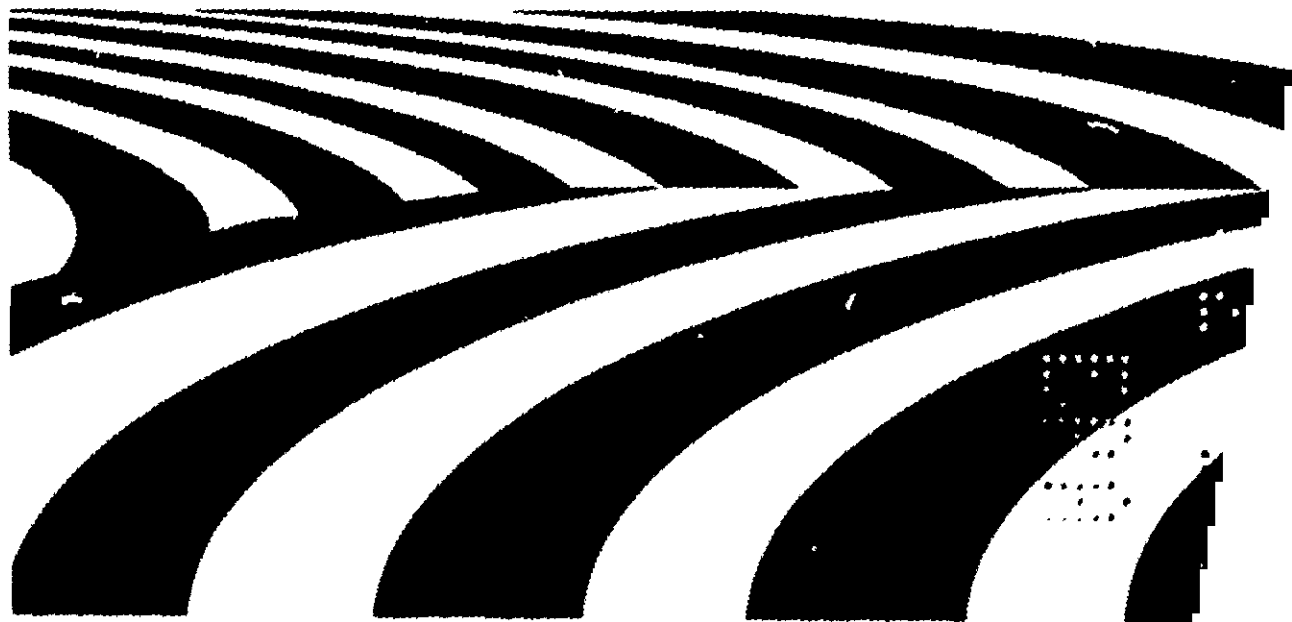
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
45639-89

FOR AGRICULTURAL USE ONLY

**Dropp® 50W**

**COTTON DEFOLIANT**

EPA Registration Number 45639



For Agricultural Use Only  
**Dropp® 50WP**  
**COTTON DEFOLIANT**  
Packed In Water Soluble Bags

**ACTIVE INGREDIENT:**

Thidiazuron\*

50%

**INERT INGREDIENTS:**

50%

**TOTAL**

100%

\*N-phenyl-N'-1,2,3-thiadiazol-5-ylurea

EPA Reg. No. 45639-89

EPA Est. No. 33689-WG-1

U.S. Patent No. 4,294,605

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION — 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 induce vomiting or give anything by mouth to an unconscious person.

**IF INHALED:** Remove person to fresh air.

**IF IN EYES:** Flush with plenty of water for fifteen minutes.

**IF ON SKIN:** Wash with plenty of soap and water.

This box contains DROPP® 50WP in water soluble bags. Inner bags dissolve in water and contents disperse. After opening outer box, open foil liner, immediately dump entire unopened inner bags into the mix tank. Do not handle soluble bags or expose them to moisture, since this may cause breakage.

*SEE SIDE PANELS FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS*

**IN CASE OF MEDICAL EMERGENCIES OR HEALTH AND SAFETY INQUIRIES, OR IN CASE OF FIRE, LEAKING, OR DAMAGED CONTAINERS, INFORMATION MAY BE OBTAINED BY CALLING 800-228-5635, EXT. 202.**

**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.

**PERSONAL PROTECTIVE EQUIPMENT**

**Applicators and other handlers must wear:**

- ▶ Long-sleeved shirt and long pants
- ▶ Waterproof gloves
- ▶ Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**ENGINEERING CONTROLS STATEMENT**

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

**USER SAFETY RECOMMENDATIONS**

Users should:

- ▶ Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- ▶ Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. 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.**

**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.

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 the following crops earlier than the specified periods after the application of DROPP 50WP:**

Small grain, sorghum, corn ..... two (2) weeks  
or root crops (except carrots,  
onions, and sugar beets)

Legumes (including alfalfa) ..... two (2) months  
or leafy vegetables (except lettuce  
and spinach)

Sugar beets ..... four (4) months

Carrots, onions, or spinach ..... nine (9) months

Lettuce ..... nine (9) months

**and only following deep  
plowing (12–15 inches).**

Do not use immature crops for food or feed.

**Do not allow spray drift to contact crops other than the target crop of mature cotton, or cotton which you desire to defoliate, as this product may injure or defoliate other crops.**

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

### PRACTICES TO LOWER THE POTENTIAL FOR DRIFT ONTO NON-TARGET CROPS

During applications, particularly under windy conditions, DROPP 50WP may drift to nontarget crops.

To help reduce the drift potential, use the following practices:

- ▶ Do not apply DROPP 50WP by ground or air when wind speeds exceed ten (10) miles per hour at the time of application. Follow local recommendations if wind speeds of less than ten (10) miles per hour are specified in those recommendations.
- ▶ Use of low nozzle pressure (20–30 psi) is recommended.
- ▶ Do not apply DROPP 50WP when a temperature inversion is present or when conditions favor an inversion prior to completing application(s).
- ▶ Additionally, do not apply DROPP 50WP by air within one-half (1/2) mile of lettuce. Do not apply DROPP 50WP by ground equipment within 100 feet of lettuce.

### PRACTICES TO LOWER DRIFT POTENTIAL ONTO NON-TARGET CROPS IN THE RIO GRANDE VALLEY OF TEXAS

To help reduce the drift potential, use the following practices:

- ▶ Do not apply DROPP 50WP by ground or air when wind speeds exceed ten (10) miles per hour at the time of application. Follow local recommendations if wind speeds of less than ten (10) miles per hour are specified in those recommendations.

- ▶ Use of low nozzle pressure (20–30 psi) is recommended.
- ▶ Do not apply DROPP 50WP when a temperature inversion is present or when conditions favor an inversion prior to completing application(s).
- ▶ Use the largest nozzle orifice possible which permits proper deposition and coverage of product.
- ▶ In addition, for citrus crops, do not apply DROPP 50WP by air when citrus in flush is within five (5) miles downwind of the point of application. Do not apply DROPP 50WP by ground when citrus in flush is within one-half (1/2) mile downwind of the point of application.

## DIRECTIONS FOR USE

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

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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

## 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 on 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.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 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 plus socks

Refer to supplemental labeling for important additional use directions. Applicable 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 the last boll you expect to harvest is mature. A boll can be described as "mature" when it is too hard to be dented when squeezed between thumb and fingers, is difficult to slice with a sharp knife, and/or when seeds cut in cross sections have fully developed cotyledons, as evidenced by an absence of jelly within the seed. Apply DROPP 50WP at least 5 days prior to anticipated harvest.

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

1. Actively growing cotton
2. High humidity
3. High moisture content in leaf of cotton plant

**Use of DROPP 50WP alone (without a tank-mix partner) 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 is variable under low temperatures. Ideally, nighttime temperatures 2-3 days prior to and 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. The use of compounds that desiccate leaf tissue is 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 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 11b bags) of DROPP treats 12.5-25 acres (0.2-0.4lbs 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.

**PRECONDITIONING 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<sup>1</sup> FOR BOLL OPENING:** The tank-mix of DROPP 50WP plus Prep<sup>®</sup> 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. (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. The higher rate of DROPP should be used where excessive regrowth is anticipated, or during cooler temperatures.

Apply as a dilute spray as follows:

Application Method	Gallons of Water/Acre
Aerial	3-10
Ground	10-50

**TANK-MIX OF DROPP 50WP PLUS PREP FOR DEFOLIATION ENHANCEMENT:** Lower rates of Prep may be tank-mixed with DROPP 50WP to enhance defoliation without providing boll opening activity. Prep may still be applied as a sequential treatment for boll opening following an application of DROPP 50WP plus Prep at a defoliation enhancement rate. Read and follow the Prep label, and do not exceed a maximum of 2.0 lb. ai/acre for combined uses of PREP per acre per year.

Apply DROPP 50WP at a rate of 0.1–0.4 lbs. formulated product plus Prep at 1/3 pint per acre (0.25 lbs. ai/acre). The higher rates of DROPP 50WP should be used where excessive regrowth is anticipated, or during cooler temperatures.

**TANK-MIX OF DROPP 50WP PLUS DEF 6<sup>2</sup> OR DROPP 50WP PLUS FOLEX 6EC<sup>3</sup>:** The tank-mix of DROPP 50WP and Def<sup>®</sup> 6 or Folex<sup>®</sup> 6EC 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 0.1–0.4 lbs  
DROPP 50WP + 0.5–2.0 pints Def 6

**DROPP 50WP + Folex 6EC =** Use 0.1–0.4 lbs  
DROPP 50WP + 0.5–2.0 pints Folex 6EC

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

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

Use lower rate of Def 6 or Folex 6EC 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 6EC 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 6EC according to rate desired **after** the DROPP 50WP has completely dispersed.

A second application of the labeled tank-mix may be made where necessary, but not exceeding a total of 0.6 lbs DROPP per acre.

Refer to Def 6 and Folex 6EC 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 6EC IN THE RIO GRANDE VALLEY COUNTIES OF STARR, HIDALGO, WILLACY, AND CAMERON.**

#### **IMPORTANT CLEANOUT 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. Refer to AgrEvo technical information bulletins for recommended tank cleaners which have been found to effectively remove 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 equipment, they may be released during subsequent applications and may cause damage to crops. AgrEvo USA Company accepts no liability for damage to crops due to inadequately cleaned equipment.

#### **SEQUENTIAL APPLICATION PRECAUTION**

Do not apply sequential application 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.

<sup>1</sup>Prep is a trademark of Rhone-Poulenc, Inc.

<sup>2</sup>Def 6 is a registered trademark of Miles Chemical Corporation, Agricultural Chemical Division.

<sup>3</sup>Folex 6EC is a registered trademark of Rhone-Poulenc, Inc., Agricultural Chemical Division.

\*\*In limited trials, the recommended 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.**

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**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 AgrEvo USA Company's control, it is impossible for AgrEvo USA Company 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, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, WHICH EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of AgrEvo USA Company is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. AgrEvo USA Company disclaims any liability whatsoever for incidental or consequential damages, including, but not limited to, liability arising out of breach of contract, express or implied warranty (including warranties of merchantability and fitness for a particular purpose), tort, negligence, strict liability or otherwise.

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