



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

SEP 8 1994

ELIZABETH D. OWENS
ISK BIOTECH CORP.
5966 HEISLEY ROAD BOX 8000
MENTOR, OH. 44061

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 04/18/94 in Response to PR Notice 93-7
EPA Reg. No. 50534-107
PICKALL

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

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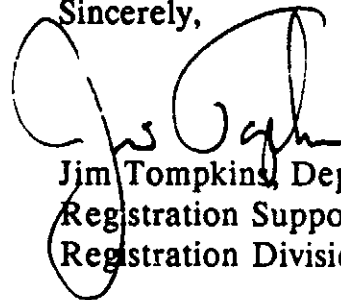
Submit the final printed labeling via the U.S. Postal Service to:

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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Elizabeth Owens
ISK BIOTECH CORP.

Comments for: EPA REG. NO. 50534-107
PICKALL

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Change the footwear requirement for "applicators and other handlers" and for early entry PPE to "shoes plus socks".

Based on the current label you submitted and your certification of the toxicological categories for your product, You may delete the respirator requirement for applicators and other handlers and the requirement for protective eyeware for applicators and other handlers and for early entry.

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PICKALL®

Cotton Defoliant

(Sodium Cacodylate Liquid Plus Surfactant)

Active Ingredient:

Sodium cacodylate

32.18%

Inert Ingredients:

67.82%

Total

100.00%

Total Arsenic (as elemental) all in water soluble form

15.46%

Product Contains 3.10 lbs. cacodylic acid equivalent per gallon.

Keep Out of Reach of Children

CAUTION:

See Side Panel for Additional Precautionary Statements

ISK Biotech Biosciences Corporation

5966 Heisley Road

P.O. Box 8000

Mentor, Ohio 44061-8000

EPA Reg. No. 50534-107

EPA Est. No.

PICKALL® is a registered trademark of ISK Biotech *Biosciences Corporation*

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 8 1994

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

50534-107

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or absorbed through the skin.

Avoid Contact with eyes, skin or clothing.

Avoid breathing vapors or spray mist.

If swallowed, induce vomiting immediately by giving two glasses of water and sticking finger down throat. **NEVER** give anything by mouth to an unconscious person. Seek medical attention.

In case of contact, flush eyes with plenty of water for at least 15 minutes. Seek Medical attention.

Wash exposed skin gently with plenty of soap and water.

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 exposures in enclosed areas:

- * A respirator with either an organic vapor-removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

For exposures outdoors:

- * Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

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.

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.
- * 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.

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** apply when weather conditions favor drift from target area. **Do not** contaminate water by cleaning of equipment or disposal of wastes. Do not spray or allow drift onto vegetables, ornamentals or other desirable plants.

Pickall

Read entire label before using this product.

General Information

Pickall Cotton Defoliant is useful as a harvest aid for the defoliation of irrigated and dryland cotton with aerial or ground application equipment. 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 application equipment and at spray volumes of 15 to 25 gallons per acre, add 1/3 to 2/3 pints of a suitable surfactant cleared for application to growing crops.

Pickall Cotton Defoliant is used as a harvest aid for the defoliation of cotton. Its phytotoxic properties are quickly inactivated on contact with the soil. It is a combination of a defoliating agent surfactant. It is desirable to add additional surfactant when using ground application equipment (see use directions), not needed for aerial application.

Note: Local conditions, crop varieties and application regulations vary and may affect use of this herbicide. Consult local agricultural experiment station or extension service weed specialists and state regulatory agencies for recommendations in your area.

Note: When stored at temperatures below freezing, it may be necessary to warm contents to 45°F and mix thoroughly before using.

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. 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 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

Preparation of the Spray: Pickall Cotton Defoliant is completely water soluble. Fill the spray equipment reservoir about half full with water and with agitator running add the required amount of Cotton Defoliant. Finish filling the reservoir with water and apply. Clean equipment thoroughly by flushing with water after use *in a safe place*. **Do not** store spray solution in tank for a prolonged period. *overnight*.

Defoliation of Dryland Cotton: Apply 2 to 2.5 pints of Cotton Defoliant per acre when 50% or more of the bolls are open and 7 to 10 days prior to anticipated picking.

Defoliation of Irrigated Cotton: Apply 2.5 to 3 pints of Cotton Defoliant per acre when 50% or more of the bolls are open and 7 to 10 days prior to anticipated picking.

Do not feed treated foliage to livestock or graze treated areas.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Disposal: Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures under Resource Conservation and Recovery Act.

Container Disposal: **Do not** reuse empty container. Triple rinse (or equivalent) and offer for recycling or reconditioning or dispose of in a sanitary landfill, or by other approved State and local procedures.

Warranty and Limitation of Damages

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such directions. **Seller makes no other express or implied warranty, including any other express or implied warranty of Fitness or of Merchantability, and no agent of Seller is authorized to do so.** In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.

Buyers and users of this product are responsible for all loss or damage from use or handling of this product which results from conditions beyond the control of Seller, including, but not limited to, incompatibility with other products unless otherwise expressly provided in the Directions for Use of this product weather conditions, cultural practices, moisture conditions or other environmental conditions outside of the ranges that are generally recognized as being conducive to good agricultural and/or horticultural practices.