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### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MAY 2 4 2005

Bill Washburn Micro Flo Company LLC P.O. Box 772099 Memphis, Tennessee 38117

Subject: Ethephon 2#

EPA Registration No. 51036-243

Your revised label amendment application submitted by

e-mail on October 6, 2004

Dear Mr. Washburn,

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, provided that you:

- Make the following change to the label. Near the beginning of the label, in the Spanish language sentence following "DANGER - PELIGRO", change "entiente" to "entiende".
- 2. Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration may be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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If you have any questions about this letter, please contact me at (703)305-7381 or <a href="mailto:bazuin.john@epa.gov">bazuin.john@epa.gov</a>.

John B. Bayum,

John B. Bazuin, Jr.

Acting Product Manager (22)

Fungicide Branch

Registration Division (7505C)

Attachment: Label stamped "ACCEPTED with COMMENTS"

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ACCEPTED with COMMENTS In EPA Letter Dated:

Yungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

51036-

MAY 2.4 2005 Under the Federal Insecticide,

#### SUPPLEMENTAL LABELING

# ETHEPHON 2# Plant Growth Regulator

For Commercial or Agricultural Use Only.
Not for Residential Use.

EPA Registration No. 51036-243

## KEEP OUT OF REACH OF CHILDREN DANGER - PELIGRO

Si usted no entiente la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.

#### **DIRECTIONS FOR USE**

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

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR INSECT CONTROL, CROP INJURY, OR ILLEGAL RESIDUES.

Follow all applicable directions, restrictions and precautions, including statements pertaining to the Worker Protection Standard, on the EPA registered label.

This label must be in the possession of the user at the time of application

#### COTTON

A foliar spray of Ethephon 2# will accelerate opening of mature unopened cotton bolls and enhance defoliation which can result in earlier harvest with an increased recoverable yield. Ethephon 2# treatment allows increased efficiency from a once-over harvest.

#### SPRAY PREPARATION

Add 1/2 to 3/4 of the required amount of water to the spray tank. Start agitation. Add the required amount of Ethephon 2#, and the remaining amount of water. Prepare only as much spray solution as can be used on the day of mixing. Do not allow spray solution to stand overnight. Do not spill the concentrated product on spray equipment, or any airplane parts.

ANY SPILLS SHOULD BE RINSED IMMEDIATELY WITH PLENTY OF WATER.

Use of a nurse tank is highly recommended for avoiding possible spills of concentrated formulation on spray equipment or any airplane parts.

#### TANK MIXTURES WITH DEFOLIANTS AND INSECTICIDES

Follow all applicable use precautions and rate per acre recommendations on labels of products applied as tank mixtures or in sequence with Ethephon 2#. In some cases slight reduction in boll opening response has been observed when tank mixes with defoliants were used.

Good agitation in the spray tank is essential and a tank mixture should not be allowed to stand without agitation for more than 5 to 10 minutes. Read and observe all appropriate label use directions and precautions for the defoliants and insecticides used.

DO NOT MIX WITH DESICCANTS IF COTTON IS TO BE SPINDLE HARVESTED.

Filename: Ethephon 2 (Cotton Supplement)(243-100604).doc

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DO NOT TANK MIX ETHEPHON 2# WITH DEFOLIANTS CONTAINING SODIUM CHLORATE BECAUSE THIS RESULTS IN THE FORMATION OF HYPOCHLOROUS ACIDS WHICH UPON HEATING EMIT TOXIC CHLORINE FUMES.

#### **EQUIPMENT CLEANING**

Because of the acidic nature of this product, prolonged exposure to spray deposits will damage acrylic plastics, certain paints, and metals.

Rinse thoroughly with a detergent and water all exposed acrylic plastic-type materials (e.g., aircraft windshields), and painted surfaces within an hour after exposure to spray deposits.

At the end of each day, rinse thoroughly with a detergent and water all the metal parts of the aircraft and the associated spray equipment exposed to the spray deposits.

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USE	EXPECTED CONDITIONS	ETHEPHON 2# RATE		ONE GALLON ETHEPHON 2# TREATS	SPRAY	VOLUME	APPLICATION TIMING
		PINT/A	LBS Al	ACRES	GROUND	AIR**	
ETHEPHON 2#*	Hot and dry 80°F or higher	4	1.0	2	15 - 50	2 - 5	Apply when the number of mature unopened bolls is sufficient to produce the desired crop. See below for test of boll maturity. Treatment uniformly opens bolls 7 to 14 days earlier.
	Dry and 75 F to 80 F	6	1.5	1 1/3			
	Cool but above 65 F or Rank cotton	8	2	1			
ETHEPHON 2# + tribufos (defoliant) tank mix	High soil moisture or High fertility level or Rank cotton	1	.25	8	15 - 50	5 - 10	Apply 4 to 7 days prior to Ethephon 2# boll opening application. To be used as a sequential treatment with, not in place of Ethephon 2# boll opening treatment.
ETHEPHON 2# + (thidiazuron) defoliant tank mix	High soil moisture or High fertility level or Rank cotton	1	.25	8	10 - 50	3 - 10	Apply 4 to 7 days prior to Ethephon 2# boll opening application. To be used as a sequential treatment with, not in place of Ethephon 2# boll opening treatment.

USE	EXPECTED CONDITIONS	ETHEPHON 2# RATE		ONE SPRAY VOLUME GALLON ETHEPHON 2# TREATS		APPLICATION TIMING	
		PINT/A	LBS Al	ACRES	GROUND	AIR**	
Pre- conditioner for defoliation	Hot, dry, above 80°F	2	.5	4	15-50	2-5	Apply 4 to 7 days prior to defoliant. Enhances top crop defoliation reducing deterioration of bottom crop and allows for earlier harvest.
	Cool, above 65°F or Rank cotton	4	1.0	2			

<sup>\*</sup>Pretreatment With Defoliants Prior to Ethephon 2# Treatment

If the cotton is overly rank or laying down in the middles and good spray coverage of the bolls with Ethephon 2# is difficult, a pretreatment with defoliants will be useful to improve boll coverage with Ethephon 2#. Use dosage rates of Ethephon 2# recommended for boll opening. Read and observe all appropriate label use directions and precautions for the defoliant used.

\*\*NOTE: For California and Arizona use a volume of no less than 5 gallons per acre for aerial applications.

#### **Boll Maturity**

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.

#### **Use Limitations**

- Do not exceed a maximum of 2.0 lb. ai/A for combined uses of Ethephon 2# (or other ethephon containing products) per acre per year.
- Boll Opening: Do not tank mix Ethephon 2# with a desiccant if the cotton is to be spindle harvested.
- Pre-Condition for Defoliation: Do not tank mix Ethephon 2# with desiccants unless plant desiccation is required. Do not use a defoliant before there is sufficient mature unopened bolls to produce the desired yield (see General Information section on how to test for boll maturity).

#### When to Harvest

Do not harvest cotton sooner than 7 days after a treatment with Ethephon 2#. Observe the treated crop and harvest when optimum boll opening has been reached. Too early harvest might reduce the full advantage of the treatment and too late a harvest may result in reduced quality and loss of lint, which will drop from the plant.

Manufactured by: Micro Flo Company LLC PO Box 772900 Memphis, TN 38117