

MAY 20 1996

Mr. T. Jeffrey Jones  
Entek Corporation  
P.O. Box 458  
Brea, CA 92622

## Subject:

EPA Registration No. 68891-7  
Amended Label  
Your Letter Dated 5/20/96

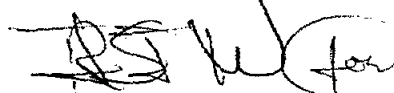
Dear Mr. Jones:

The label for the subject registration is acceptable provided that you:

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

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

Sincerely yours,



Robert J. Taylor  
Product Manager (25)  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated

MAY 20 1996

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

# ETK-2201

## COTTON HARVEST AID / DEFOLIANT

Active Ingredients:

1-Aminomethanamide dihydrogen tetraoxosulfate .....	58.6%
2-Chloroethylphosphonic acid .....	18.3%
Inert Ingredients .....	23.1%
<b>TOTAL.....</b>	<b>100.0%</b>

Density in lb/gal @ 68°F ..... 12.45

**KEEP OUT OF REACH OF CHILDREN**

**DANGER PELIGRO**

Si usted no entiende 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.)

SEE ADDITIONAL PRECAUTIONARY STATEMENTS  
ON THE NEXT PAGE

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

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

**IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

**IF IN EYES:** Hold eyelids open and flush with a gentle stream of water for 15 minutes. Get medical attention.

**NOTE TO PHYSICIAN:** There is no specific antidote. Treat symptomatically. Consideration should be given to the possibility that overexposure to materials other than this product may have occurred.

Acid ingestion may cause gastroesophageal perforation. Perforation may occur within 72 hours, but along with abscess formation, may occur weeks later.

Due to the corrosive property of this material, emesis is contraindicated. Careful gastric lavage is required because of the possibility of esophageal perforation. The use of alkaline substances to neutralize the acid is contraindicated.

Victims of severe overexposure by inhalation should be kept under medical observation for up to 72 hours for delayed onset of pulmonary edema.

**PHYSICIAN:** Call 1 (800) 424-9300 for further information.

**WARRANTY LIMITATIONS AND DISCLAIMER**

1. Entek warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated when used in accordance with the use directions under normal conditions. Entek neither makes, nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, express or implied, concerning this material.

2. Critical and unforeseeable factors beyond Entek's control prevent it from eliminating all risks in connection with the use of this material. Such risks include, but are not limited to, damage to plants and crops to which the material is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for uses stated herein and even though label directions are followed. Buyer and user acknowledge and assume all risks and liability resulting from the handling, storage, and use of this material (except those assumed by Entek in (1) above). Entek shall not be liable for incidental or consequential damages.

**PATENTS AND PATENTS PENDING**

The product contained herein is described in the following U.S. composition, manufacturing and/or method of use patents: 4397675, 4404116, 4445925, 4818269, 4966620, and 4994101. Other U.S. and foreign patents are pending.

A license is hereby granted to the purchaser under the above listed U.S. Patents only, and only for the use of the product contained herein, and only in accordance with the instructions on this label. **NO OTHER LICENSE, EXPRESS OR IMPLIED, IS GRANTED. NOT FOR EXPORT.**

Manufactured for



Entek Corporation  
P.O. Box 458  
Brea, CA 92622-0458  
(714) 973-7612

**Net Contents: \_\_\_\_\_ Gallons**

EPA Reg. No. 68891-7

EPA Est. No. \_\_\_\_\_

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## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### DANGER

**CORROSIVE.** Causes irreversible eye damage. Causes skin irritation. Harmful if swallowed, inhaled, or absorbed through skin. Do not get in eyes, on skin, or on clothing. Avoid breathing spray mist. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**PERSONAL PROTECTIVE EQUIPMENT (PPE):** Applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instruction for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**ENGINEERING CONTROLS STATEMENTS:** 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 body thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**ENVIRONMENTAL HAZARDS:** This product may be harmful to wildlife directly sprayed. 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 when disposing of equipment wash waters. Do not apply in any manner not specified on the label.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not allow ETK-2201™ to be heated above 176°F, as the quality of the product may deteriorate. If ETK-2201 is heated above 230°F, vigorous decomposition may occur. Do not weld equipment containing ETK-2201.

**CLOTHING:** ETK-2201 can attack cotton, nylon, and leather clothing. If ETK-2201 contacts clothing of this type, flush with plenty of water to minimize damage.

**USE PRECAUTIONS:** DO NOT MIX with materials containing chlorates as this could result in the formation of hypochlorous acids which on heating will emit toxic chlorine fumes.

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

Avoid spray drift to nearby crops as this product may cause modifications in plant growth. Plant injury or reduced yields may result.

Do not plant another crop within 30 days after treatment.

Mix only the amount of spray you expect to use each day. Do not allow mixed solution to stand overnight.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**STORAGE:** Material crystallizes below 32°F. Do not heat above 176°F.

Materials recommended for use with ETK-2201 include polyethylene, polypropylene, PVC, CPVC, fiberglass made with reinforced resins such as polyesters and epoxides, most rubbers, and 316 stainless steel.

Do not expose mild steel, leather, nylon, or acid sensitive resins such as delrin and celcon to undiluted ETK-2201.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. 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) all containers and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by procedures approved by state and local authorities.

**RETURNABLE - REFILLABLE CONTAINERS:** After use, return the container to the point of purchase or designated locations. This container must only be refilled with ETK-2201 Cotton Harvest Aid. DO NOT REUSE THE CONTAINER FOR ANY OTHER PURPOSE. Prior to refilling, inspect thoroughly for damage such as cracks, punctures, abrasions and damaged or worn out threads on closure devices. Do not refill or transport damaged or leaking containers. Check for leaks after refilling and before transportation. If the container is not being refilled, return it to the point of purchase.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Follow all applicable directions, restrictions, and precautions on the EPA-registered label. 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. This label must be in the possession of the user at the time of 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 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 in this labeling 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 48 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 over long-sleeved shirt and long pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Notify workers of the application by warning them orally and posting signs at entrances to treated areas.

**COTTON HARVEST AID****Application Recommendations****GENERAL INFORMATION**

ETK-2201, when applied as a foliar spray to cotton, provides fast, effective defoliation of cotton plants and increases the speed and efficacy of opening mature bolls. Typically, satisfactory defoliation is achieved within 7 days. Adverse conditions, such as low temperatures and/or toughened plants may require up to 14 days. ETK-2201 also provides limited control of cotton regrowth.

**APPLICATION TIMING & RATE**

Apply ETK-2201 when sufficient, mature, unopened bolls have developed to produce the desired cotton yield (approximately 65% in most cases). Consult University recommendations in your area for testing of boll maturity. Treatment with ETK-2201 before the appropriate number of bolls have reached maturity may result in reduction of yield.

Apply 1.5 to 3.5 quarts of ETK-2201 per acre. Under dry, hot conditions over 80°F and where plant conditions are optimum for defoliation, use 1.75 quarts per acre. For best results in obtaining effective defoliation and boll opening, apply 3 quarts of ETK-2201 per acre. During adverse weather conditions (night time lows < 60°F, daytime highs < 75°F) or on rank cotton, use 3.5 quarts of ETK-2201 per acre.

When conditions are favorable for excessive regrowth prior to harvest, Dropp® 50WP may be added to the tank mix to aid in control of regrowth (refer to the Dropp label for rates). Generally, satisfactory results are obtained by the addition of 0.10 pounds of formulated Dropp 50WP per acre

To ensure optimum activity, thorough and uniform spray coverage is required. It is essential that cotton leaves and

unopened bolls are contacted in order to achieve satisfactory results. Apply as a dilute spray in 15-30 gallons of water per acre by ground application or 3-10 gallons of water per acre by aerial application.

Two applications of ETK-2201 are allowed per year, but do not exceed a maximum of 3.5 quarts per acre per year.

ETK-2201 may also be tank mixed with Cyclone®, Ginstar®, Harvade® 5F, Quick-Pick®, Roundup®, or Starfire®. (Refer to product labels for rates and additional product information.)

Urea, ammonium sulfate or fertilizer products are not necessary with ETK-2201 tank mixtures.

Do not harvest cotton sooner than 7 days after treatment with ETK-2201.

**MIXING PROCEDURE**

Add 1/2 to 3/4 of the required amount of water to the spray tank and begin agitation. Add the required amount of ETK-2201 and then the remaining amount of water. If Dropp® is used in the mixture, it should be added to the spray tank first, followed by ETK-2201. Prepare only as much spray solution as can be used on the day of mixing. Do not allow the spray solution to stand overnight. Do not permit undiluted ETK-2201 to contact painted surfaces, spray equipment, or any airplane parts. All spills should be rinsed immediately with plenty of water.

**EQUIPMENT CLEANING**

Rinsing is strongly recommended with ETK-2201. Prolonged exposure to spray deposit may damage acrylic plastics, certain paints, and metals. Dilute residues are corrosive, so neutralization is an essential part of the cleanup. All interior surfaces should be rinsed with a neutralizing solution prior to being parked. The best neutralizing solution to use is baking soda. Add one pound neutralizer to the rinse water. Run the pump long enough to clear the lines and nozzles of ETK-2201 residue and rinse the exterior of the equipment. Areas used to rinse equipment should be rinsed well since ETK-2201 is corrosive to concrete.

**TRADEMARKS**

Dropp® 50WP is a registered trademark of AgrEvo USA Co.  
Roundup® is a registered trademark of Monsanto Co.  
Cyclone® is a registered trademark of Zeneca Ag Products.  
Ginstar® is a registered trademark of AgrEvo USA Co.  
Harvade® 5F is a registered trademark of Uniroyal Chem Co.  
Quick-Pick® is a registered trademark of United Agri-Products, Inc.  
Starfire® is a registered trademark of Zeneca Agrochemicals.