70506-193 (

04-09-2010

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



OFFICE OF PREVENTION, PESTICIDES, AND TOXIC SUBSTANCES

APR _ 9 2010

Timothy M. Formella Senior Registration Manager United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406

Dear Mr. Formella:

Subject:

Submission of amended labeling per MOA for Methyl Parathion 3/29/10

EPA Reg. No. 70506-193

Submissions dated March 23, 2010

The proposed labeling referred to above, EPA Reg. No. 70506-193, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Memorandum of Agreement (MOA) between the EPA and Cheminova A/S, Cheminova Inc, and United Phosphorus, Inc., is acceptable with the following comment:

1) On pages 3 and 10 of the label, replace the subheader "General Information" with "Precautions and Restrictions." The information following the subheader is definitive and restrictive in nature and not just an overview as the term general information implies.

Please submit two copies of your final printed label before you release the product for shipment. As per the MOA, products shipped January 1, 2011 or after must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

A stamped copy is enclosed for your records. If you have any questions, please contact Marianne Lewis at (703) 308-8043 or lewis.marianne@epa.gov.

Regards,

Venus Eagle

Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure

INSECTICIDE

RESTRICTED USE PESTICIDE

Due to residual effects to avian species and bees.

For retail sale to, and use only by Certified Applicators or persons under the direct supervision of a -Certified Applicator, and only for those uses covered-by the Certified-Applicator's certification.

PENNCAP-M® Microencapsulated Insecticide ACCEPTED

| ACTIVE INGREDIENTS | with COMENTS |
|--|---|
| O,O-Dimethyl O-p-nitrophenyl phosphorothioate* | .20.9% in EPA Letter Dated: |
| Related Isomers | |
| OTHER INGREDIENTS: | .78.0% Europide and B |
| TOTAL | Fungicide, and Rodenticide Act, |
| *Methyl Parathion (Contains 2 pounds Methyl Parathion and Related Isomers per U.S. Patent Nos. 3,429,827; 3,577,515; 3,959,464 | As amended, for the pesticide Registered under EPA Reg. No. |
| U.S. FAIGHT 1908. 3,429,627, 3,377,313, 3,739,404 | 70506-193 |

SPECIAL NOTICE TO USERS: It is unlawful to use this product after December 31, 2013. This container and any contents remaining after December 31, 2013 shall be disposed of in accordance with State and Federal law.

AVISO WARNING

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.)

| someone to expi | ain it to you in detail.) | | |
|--|--|--|--|
| | FIRST AID | | |
| | ORGANOPHOSPHATE | | |
| If inhaled | Move person to fresh air. | | |
| | • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. | | |
| | Call a poison control center or doctor for further treatment advice. | | |
| If swallowed | Call a poison control center or doctor immediately for treatment advice. | | |
| | Have person sip a glass of water if able to swallow. | | |
| | Do not induce vomiting unless told to do so by a poison control center or doctor. | | |
| | Do not give anything by mouth to an unconscious or convulsing person. | | |
| If on skin or | Take off contaminated clothing. | | |
| clothing | • Rinse skin immediately with plenty of water for 15 – 20 minutes. | | |
| Call a poison control center or doctor for treatment advice. | | | |
| • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. | | | |
| Call a poison control center or doctor for treatment advice. | | | |
| Have the produc | et container or label with you when calling a poison control center or doctor, or going for treatment. | | |
| Contact the Rocky Mountain Poison Center at 1-866-673-6671 for emergency medical treatment information. | | | |
| | NOTE TO PHYSICIAN | | |
| This product contains methyl parathion, an organophosphate that inhibits cholinesterase. If symptoms of | | | |
| cholinesterase inhibition are present, Atropine by injection is antidotal. 2-PAM is also antidotal and may be | | | |
| administered in | conjunction with atropine. Morphine is contraindicated. | | |

| EPA Registration No. 70506-193 | EPA Establishment No. 5905-AR- |
|--------------------------------|--------------------------------|
| Net Contents: | Batch/Lot # |

UNITED PHOSPHORUS, INC. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

WARNING

MAY BE FATAL IF INHALED. HARMFUL IF SWALLOWED. HARMFUL IF ABSORBED THROUGH SKIN. Do not breathe vapors or spray mist. Avoid contact with eyes, skin, or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

If you feel sick in any way, STOP work and get help right away. See First Aid section on main container label.

The Rocky Mountain Poison Center is available for recommendations regarding poisoning management, emergency treatment, and other information regarding the toxicity of methyl parathion. The toll free number for the Rocky Mountain Poison Center is 1-866-767-5089.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are made of any waterproof material. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

Mixers and loaders for aerial application using engineering controls and all applicators using engineering controls must wear:

- Long-sleeved shirt and long pants,
- Shoes plus socks,
- In addition, mixers and loaders must wear chemical-resistant gloves and a chemical-resistant apron.

See Engineering Controls for additional requirements.

Mixers and loaders for ground application must wear:

- Coveralls over long-sleeved shirt and long pants,
- Chemical-resistant gloves,
- · Chemical-resistant footwear plus socks,
- · Chemical-resistant headgear if overhead exposure,
- Chemical-resistant apron if exposed to the concentrate, and
- A respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P, or HE prefilter.

Handlers performing tasks, such as spill clean-up, for which engineering controls are not feasible, must wear the PPE cited above for mixers and loaders for ground application.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Engineering Controls for Mixers and Loaders for Aerial Application

Mixers and loaders for all aerial applications must use a closed system that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4)], for dermal protection and must:

- Wear the PPE listed above for mixers, loaders using engineering controls,
- Wear protective eyewear if the system operates under pressure, and
- Be provided, must have immediately available, and must use in an emergency, such as a broken package, spill, or equipment breakdown the following: coveralls and chemical-resistant footwear and a respirator specified in the PPE section above.

Engineering Controls for All Applicators

Use of human flaggers is prohibited.

Applicators must use an enclosed cab that meets the definition in the Worker Protection Standard for agricultural pesticides [40 CFR

170.240(d)(5)] for dermal protection. In addition, such applicators must:

- Wear long-sleeved shirt and long pants,
- Wear shoes plus socks,
- Either wear the type of respirator specified in the PPE section above or use an enclosed cab that is declared in writing by the manufacturer or by a government agency to provide at least as much respiratory protection as the type of respirator specified in the PPE section above.
- Be provided, must have immediately available, and must use in an emergency when they must exit the cab in the treated area: coveralls, chemical-resistant gloves, chemical-resistant footwear, a respirator as specified in the PPE section above, and chemical-resistant headgear if overhead exposure,
- Take off any PPE that was worn in the treated area before reentering the cab, and
- Store all such PPE in a chemical-resistant container, such as a plastic bag, to prevent contamination of the inside of the cab.

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard for agricultural pesticides [40 CFR 170.240(d)(6)].

USER SAFETY RECOMMENDATIONS:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE 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.

Note to Physician: The active ingredient of PENNCAP-M is an organophosphate cholinesterase inhibitor. Atropine is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine. Morphine is contraindicated.

Warning signs of organophosphate poisoning include weakness, headache, tightness in chest, blurred vision, non-reactive pin-point pupils, salivation, sweating, nausea, vomiting, diarrhea, and abdominal cramps. If these symptoms appear, transport the patient immediately to the nearest hospital. Keep the patient prone and quiet. Start artificial respiration immediately if patient is not breathing.

Call a physician in all cases of suspected poisoning. It is suggested that a suitably equipped local medical facility be identified prior to using this product.

GENERAL INFORMATION

PENNCAP-M is a flowable formulation consisting of a water suspension of polymeric-type microcapsules which contain methyl parathion. It is applied by air or ground equipment by diluting it with an amount of water suitable for the specific crop and type of spraying equipment. For air application, use at least 2 gallons total spray per acre unless specified otherwise.

Mixing Instructions - First fill the tank with 1 to 1 1/2 gallons of water for each gallon of PENNCAP-M to be used. Start mechanical or hydraulic agitation. Slowly add the required amount of PENNCAP-M, agitate a few minutes; continue agitating and add the remaining volume of water. This procedure should be followed to insure proper mixing of PENNCAP-M.

For Tank Mixes: After pre-mixing PENNCAP-M and water as described above, fill the tank 1/2 to 3/4 full. Add tank mix products in the following order:

- 1. Wettable powders
- 2. Dry flowable or Wettable dry granules
- 3. Flowables
- 4. Emulsifiable concentrates
- 5. Fertilizer products

Add the remaining volume of water.

Mixtures of PENNCAP-M with emulsifiable concentrates, organic solvents, or some surfactants may cause increased toxicity and shorter residual effectiveness. This effect is more pronounced with concentrated sprays and extended periods between mixing and application.

5 (Y

STIR OR SHAKE BEFORE USING.

DO NOT USE SCREENS OR NOZZLES FINER THAN 50 MESH.

PENNCAP-M will not control organophosphate resistant insects.

Rainfall soon after application may decrease effectiveness of PENNCAP-M. Applications are not recommended if rainfall is expected within 6 hours of application.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to birds and mammals. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not mix, load, or otherwise handle in areas prone to runoff or movement into aquatic environments. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Keep out of lakes, ponds, and streams. Do not contaminate water when disposing of equipment wastewater or rinsate.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area. Refer to and follow the more specific and applicable precautions in the directions for certain crops. Information for protecting bees may be obtained from your local Extension Service.

SPRAY DRIFT

A variety of factors including weather conditions, (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast, chemigation) can influence pesticide drift. The applicator and grower must evaluate all factors and make appropriate adjustments when applying this product.

- All aerial and ground application equipment must be properly maintained and calibrated using water as carrier. Do not apply
 this product in any carrier other than water.
- Use the largest droplet size consistent with good pest control. Small droplets are more prone to spray drift and can be
 minimized by appropriate nozzle selection, by orienting nozzles away from the air stream as much as possible, and by
 avoiding excessive spray boom pressure.
- Do not apply at wind speeds greater than 10 mph at the application site.
- Apply as close to target plants as practical to obtain a good spray pattern for adequate coverage.
- For aerial applications, do not apply at heights greater than 10 feet (consistent with flight safety).
- For aerial applications, the spray boom should be mounted on the aircraft so as to minimize drift caused by wing tip vortices. The minimum boom length should be used and must not exceed 75% of wingspan or rotor diameter.
- For ground applications, do not apply at heights greater than 4 feet.

DIRECTIONS FOR USE

This is a Restricted Use Pesticide.

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

This product may not be reformulated or used under a State Special Local Need Registration for any uses not specified on this labeling other than walnuts or sweet potatoes.

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.

Application by Backpack Sprayer or other Hand-held Sprayer is Prohibited.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 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), notification to workers, 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 workers entry into treated areas during the restricted-entry interval (REI). The REI for each crop is listed in the directions for use associated with that crop.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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 worn over long-sleeved shirt and long pants,
- Chemical-resistant gloves made from any waterproof material,
- Chemical-resistant footwear plus socks,
- Chemical-resistant headgear if there is potential for overhead exposures.

In addition, certified crop advisors and persons performing crop advising tasks under a qualified crop advisor's direct supervision are exempt from certain specified provisions of the WPS. For complete information on crop advisor exemptions under WPS, refer to 40 CFR 170.104.

FIELD CROPS

| Crop | Insects | Pints/ Acre | Remarks |
|--|---|-------------------------------|--|
| Corn (Field, Pop**, and | Corn Rootworm Adults | 1 – 2 (0.25 – 0.5 lb a.i.) | Do not apply during pollen shed if bees are foraging in the areas to be treated. |
| Specialty** Corns) | Stinkbugs** | 1-3 (0.25 – 0.75 lb a.i.) | Corn Rootworm Adults: - For silk clipping - 1 to 2 pints per acre. |
| Do not enter or allow worker entry into treated areas during | Aphids Flea Beetles Grasshoppers* Sap Beetles True Armyworm** | 2-3 (0.5 – 0.75 lb a.i.) | - To prevent egg laying - 1 1/2 to 2 pints per acre Use the low rate for light infestation. First Generation European Corn Borer: - Whorl Application - 2 pints per acre by ground Broadcast Application - 3 to 4 pints per acre. |
| the restricted entry interval (REI) of 31 days. | European Corn Borer Japanese Beetle** Silk Fly** Southwestern Corn Borer Western Bean Cutworm | 2 – 4 (0.5 – 1.0 lb a.i.) | Second Generation European Corn Borer: - Broadcast Application - 2 to 4 pints per acre Use the low rate for light infestations. When environmental conditions favor extended moth flights of the second generation of European Corn Borer, two correctly timed applications of PENNCAP-M at the lowest recommended rate may |

| Black Cutworm | 4 (1.0 lb a.i.) | provide improved control over a single application at a higher rate.** |
|---------------|--------------------|---|
| | | Apply PENNCAP-M at 2 pints/acre at the time of the initial hatch of the second generation. Repeat 10-14 days later. |
| | | For low volume aerial applications to control Corn Rootworm Adults, Aphids, European Corn Borer and Western Bean Cutworm use the indicated rates of PENNCAP-M at a minimum of 1 gallon total spray per acre.** |
| | | Application of undiluted PENNCAP-M is not recommended. Equipment that has been specially adapted and calibrated for low volume applications should be used. Best control will be achieved using spray devices that will produce droplets within the size range of 100 to 200 microns. The following conditions must be met: 1. Equipment must be adjusted to distribute spray uniformly over the spray swath; 2. Wind conditions and other factors such as temperature and humidity are such that the spray is deposited on the target; 3. Local regulations do not prohibit low volume aerial sprays. |
| | | For most efficient European Corn Borer control, use a spray schedule suitably adapted to the area. |
| | | For best Black Cutworm control, apply PENNCAP-M under moist soil conditions. |
| | | Do not apply more than 4 pints product (1.0 lb a.i.)/A per application. Do not apply more than once every 14 days. Do not apply more than 12 pints product (3.0 lbs |
| | | a.i.)/A per year. Do not make more than 3 applications per year. Do not harvest, cut for forage, or graze within 12 days of application. |

| Corn (Sweet); Silk Fly Only Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 9 days. | Silk Fly** | 2 – 3 (0.5 – 0.75 lb a.i.) | Do not apply during pollen shed if bees are foraging in the areas to be treated. Do not apply more than 3 pints product (0.75 lb a.i.)/A per application. Do not apply more than once every 14 days. Do not apply more than 12 pints product (3 lbs a.i.)/A per year. Do not make more than 4 applications per year. Do not harvest, cut for forage or graze within 12 days of application. |
|--|--|--|--|
| Corn (Sweet) NOTE: Mechanical | Corn Rootworm Adults Stinkbugs** | $ \begin{array}{r} 1 - 2 \\ (0.25 - 0.5 \text{ lb a.i.}) \\ \hline 1 - 3 \end{array} $ | Do not apply during pollen shed if bees are foraging in the areas to be treated. First Generation European Corn Borer: |
| harvesting must be used. Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 31 days. | Aphids European Corn Borer Flea Beetles Grasshoppers* Japanese Beetle** Sap Beetles Southwestern Corn Borer True Armyworm** Western Bean Cutworm Black Cutworm | (0.25 – 0.75 lb a.i.) 2 – 3 (0.5 – 0.75 lb a.i.) 3 (0.75 lb a.i.) | - Whorl Application – 2 pints per acre by ground Broadcast Application – 3 pints per acre. Second Generation European Corn Borer: - Broadcast Application – 2 to 3 pints per acre. For most efficient European Corn Borer control, use a spray schedule suitably adapted to the area. For best Black Cutworm control, apply PENNCAP-M under moist soil conditions. Do not apply more than 3 pints product (0.75 lb a.i.)/A per application. Do not apply more than once every 14 days. Do not apply more than 12 pints product (3 lbs a.i.)/A per year. Do not make more than 4 applications per year. Do not harvest, cut for forage or graze within 12 days of application. |
| Cotton Do not enter | Fleahoppers Plant Bugs Thrips** | ½ - 1 (0.125 – 0.25 lb a.i.) | Do not apply if bees are foraging in the areas to be treated. |
| or allow worker entry into treated | Boll Weevil Stinkbugs** | 1-3 (0.25 – 0.75 lb a.i.) | For Lygus, use the higher rates for increased populations after cotton is beyond pinhead square stage. |
| areas during the restricted entry interval | Pink Bollworm Whitefly (see remarks) | 2 – 4 (0.5 – 1.0 lb a.i.) | For Aphid suppression only. Will not control populations resistant to organophosphate insecticides |
| (REI) of 11 days. | Lygus | ½ - 4 (0.125 – 1.0 lb a.i.) | For Whitefly: Cerexagri recommends PENNCAP-M be tank-mixed with amitraz, a pyrethroid, or non-organophosphate insecticide |
| | Aphids (suppression) | 1-4 (0.25 – 1.0 lb a.i.) | known to be effective on this pest. Refer to local Cooperative Extension Service for more |

| Soybeans Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 11 days. | Corn Rootworm Adults Stinkbugs** Soybean Aphid** Bean Leaf Beetle Grasshoppers* Green Cloverworm Mexican Bean Beetle Potato Leafhopper Silverspotted Skipper Soybean Looper** Threecornered Alfalfa Hopper Thrips** | 2-3 $(0.5-0.75 lb a.i.)$ $1-2$ $(0.25-0.5 lb a.i.)$ $1-3$ $(0.25-0.75 lb a.i.)$ $2-3$ $(0.5-0.75 lb a.i.)$ | information on the control of Whitefly. Do not apply more than 4 pints product (1.0 lb a.i.)/A per application. Do not apply more than once every 5 days. Do not apply more than 16 pints product (4 lbs a.i.)/A per year. This includes all methods of application on cotton. Do not make more than 4 applications per year. Pre-harvest interval (PHI): 14 days Do not apply more than 3 pints product (0.75 lb a.i.)/A per application. Do not apply more than once every 7 days. Do not apply more than 6 pints product (1.5 lbs a.i.)/A per year. Do not make more than 2 applications per year. Do not apply within 30 days of harvest or grazing. |
|--|---|--|--|
| Wheat, Oats, and Barley Do not enter or allow worker entry into treated areas during the restricted entry interval | | 1 - 3 $(0.25 - 0.75 lb a.i.)$ $2 - 3$ $(0.5 - 0.75 lb a.i.)$ | Do not apply more than 3 pints product (0.75 lb a.i.)/A per application. Do not apply more than once every 7 days. Do not apply more than 6 pints product (1.5 lbs a.i.)/A per year. Do not make more than 2 applications per year. Do not apply within 14 days of harvest or grazing. |

^{*}For grasshoppers, use higher rates if the majority of insects are large or weather is cool.

**Not for this use in California.

NOTE: Dilute sprays are not to exceed maximum rate per acre.

VEGETABLE CROPS

| Crop | Insects | Pints/ Acre | Remarks |
|--|--|--|--|
| Onions | Thrips | 2 (0.5 lb a.i.) | Do not apply when onions are blooming and bees are foraging the areas to be treated. |
| Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 13 days. | | | Do not apply more than 2 pints product (0.5 lb a.i.)/A per application. Do not apply more than once every 7 days. Do not apply more than 8 pints product (2 lbs a.i.)/A per year. Do not make more than 4 applications per year. Pre-harvest interval (PHI): 15 days |
| White Potatoes | Grasshoppers* | $ \begin{array}{c c} 2-3 \\ (0.5-0.75 \text{ lb a.i.}) \end{array} $ | Do not apply more than 6 pints product (1.5 lbs a.i.)/A per application. Do not apply more than once every 7 days. |
| Do not enter or allow | Aphids Tuberworm | 4 (1.0 lb a.i.) | Do not apply more than 24 pints product (6 lbs a.i.)/A per year. Do not make more than 4 applications per year. Pre-harvest interval (PHI): 5 days |
| worker entry into treated areas during the restricted entry interval (REI) of 12 days. | Cutworms European Com Borer Flea Beetles Potato Leafhopper Tarnished Plant Bug | 2-4 (0.5-1.0 lb a.i.) | Tre-narvest interval (1711). 3 days |
| | Colorado Potato Beetle | 2-6 (0.5 – 1.5 lbs a.i.) | |

^{*}For grasshoppers, use higher rates if the majority of insects are large or weather is cool.

ULV AERIAL APPLICATION IN WATER TO COTTON NOT FOR THIS USE IN CALIFORNIA APPLICATION INSTRUCTIONS

Use spray equipment that has been specifically adapted and calibrated for ultra-low-volume spraying of PENNCAP-M. The following conditions are to be met:

- 1. Equipment must be adjusted to distribute the spray uniformly over the spray swath.
- 2. Do not apply when wind conditions favor drift from treated areas.

Spray equipment should be cleaned as soon as possible after completion of spraying. Strainers should be cleaned daily. Do not allow PENNCAP-M to dry in or on application equipment before cleaning.

| Сгор | Insect | Rates | Remarks |
|--------|-------------|--------------------------------|--|
| Cotton | Boll Weevil | PENNCAP-M 1-2 pints plus an | Do not apply if bees are foraging in the areas to be treated. Begin applications when damaging levels of boll weevils appear. |

^{**}Not for this use in California.

| Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 11 days. | equal amount of water (1-2 pints) | Add a material for Heliothis control to the tank mix when bollworms and/or budworms (Heliothis/Helicoverpa spp.) are present. Use the rate recommended on the label for the specific material used. |
|--|-----------------------------------|--|
| | | Do not apply more than once every 5 days. Do not apply more than 16 pints product (4 lbs a.i.)/A per year. This includes all methods of application on cotton. Do not make more than 4 applications per year. Do not apply within 14 days of harvest. |

CHEMIGATION NOT FOR THIS USE IN CALIFORNIA

GENERAL INSTRUCTIONS

Apply this product only through sprinkler irrigation systems including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move. Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

If you have any questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Do not connect chemigation system to any public water system. Public water system means a system for the provision of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.

SYSTEM REQUIREMENTS

Systems utilizing a pressurized water and pesticide injection system must meet the following requirements:

The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

The irrigation line or water pump must include a functional pressure switch that will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

INSTRUCTIONS FOR SPRINKLER (OVERHEAD) IRRIGATION:

Observe the requirements in the System Requirements section above.

Apply PENNCAP-M only through systems containing anti-syphon and check valves designed to prevent water source

contamination or overflow of the mix tank and containing interlocking controls between the metering device and the water pump to insure simultaneous shut-off.

Maintain a gentle continuous agitation in mix tank during mixing and application to assure a uniform suspension.

Greater accuracy in calibration and distribution will be achieved by injecting a larger volume of a more dilute suspension per unit time.

Application of more than recommended quantities of irrigation water per acre may result in decreased product performance.

Do not apply when wind speed favors drift, when system connections or fittings leak, when nozzles do not provide uniform distribution or when lines containing the product cannot be flushed and must be dismantled and drained. In a center pivot system, block the nozzle set nearest the well/pivot/injection unit to prevent spray being applied to this area. All screens should be 50 mesh or larger.

Where sprinkler distribution patterns do not overlap sufficiently, unacceptable pest control may result.

Allow sufficient time for pesticide to be flushed through all lines and all nozzles before turning off irrigation water.

PENNCAP-M may be applied in conjunction with chemically neutral liquid fertilizers. Application in conjunction with highly alkaline fertilizers, such as aqueous ammonia, may cause a degradation of the pesticide, resulting in reduced performance and should be avoided.

Check local restrictions and requirements regarding sprinkler irrigation applications, as they may vary from state to state.

SPRAY PREPARATION:

Remove scale, pesticide residues, and other foreign matter from the chemical tank and entire injector system. Flush with clean water.

Prepare a suspension of PENNCAP-M in a mix tank. Fill the tank with 1/2 or 3/4 the desired amount of water. Start mechanical or hydraulic agitation. Slowly add the required amount of PENNCAP-M and then the remaining volume of water.

APPLICATION INSTRUCTIONS:

Set sprinkler system to deliver 0.1 to 1.25 inches of water per acre. Volumes of water higher than this may reduce efficacy. Start sprinkler and then uniformly inject the suspension of PENNCAP-M into the irrigation water line to deliver the desired rate per acre. The suspension of PENNCAP-M should be injected with a positive displacement pump into the main line ahead of a right angle turn to insure adequate mixing.

NOTE: When treatment with PENNCAP-M has been completed, do not irrigate the treated area for 24 to 48 hours to prevent washing the chemical off the crop.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in the original container. Do not store in a manner where cross-contamination with other pesticides, fertilizers, food or feed could occur. If spilled during storage or handling, absorb with sand or other inert material and dispose of absorbent in accordance with the Pesticide Disposal instructions listed below.

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 Handling:

[Nonrefillable containers]

Nonrefillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. If rinsate cannot be used, follow pesticide disposal instructions. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations.

[Refillable containers]

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. If rinsate cannot be used, follow pesticide disposal instructions. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state and federal regulations.

EMERGENCY TELEPHONE NUMBERS:

CHEMTREC: (800) 424-9300

MEDICAL: (866) 673-6671 Rocky Mountain Poison Control Center

IMPORTANT INFORMATION READ BEFORE USING PRODUCT

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product reflect the opinion of experts based on field use and tests, and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of United Phosphorus, Inc. or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of United Phosphorus, Inc. and Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold United Phosphorus, Inc. and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, United Phosphorus, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or United Phosphorus, Inc., and Buyer and User assume the risk of any such use. To the extent consistent with applicable law, UNITED PHOSPHORUS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, United Phosphorus, Inc. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product and TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF UNITED PHOSPHORUS, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF UNITED PHOSPHORUS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

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rev date 03/23/2010