73631-3 1-05-2005 1/9

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
73631-3	Joanne Miller	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Thidiazuron-50WP	23	

5. Name and Address of Applicant *(Include ZIP Code)*

SRM Chemical, Ltd.Co.
3027 Marina Bay Dr., Suite 110
League City, TX 77573

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [x] Notification - Explain below.
- [x] Final printed labels in repsonse to Agency letter dated NOTIFICATION JAN 0 5 2005
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This notification is to request the expansion of the existing label to include Water Soluble Packaging, made from MonoSol Films M-8534 or M-7031, supported by the following documents: a) EPA acceptability letters pertaining to the films in question, b) a copy of the existing label for Thidiazuron 50WP, and c) a copy of the supplemental label specific for water soluble packaging (both a clean and a highlighted copy showing changes relevant to WSP). I certify that this notification is consistent with the provisions of PR Notice 94-8 and EPA regulations at 152.46 and that no other changes have been made to the labeling or the confidential statement of formula of this product. I further understand that if this notification is not consistent with the terms of PR Notice 94-8 and 152.46, then this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [ ] No	[x] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [x] Other (Specify) PVOH Film
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt: 1 pound / No. per container: 5	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [x] Container	5 pounds	[ ] Outer container. No ink on WSP itself.

6. Manner in Which Label is Affixed to Product

[x] Lithograph / Paper glued / Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Paul D. Smith	President	(281)335-3646

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received (Stamped)
Paul D Smith	President	
4. Typed Name	**5. Date**	
Paul D. Smith	December 20, 2004	

NOTIFICATION

JAN 0 5 2005

2/9

THIDIAZURON - 50WP

Cotton Defoliant For Agricultural Use Only

ACTIVE INGREDIENT:

Thidiazuron*	50.0%
Inert Ingredients:	50.0%
TOTAL:	100.0%

* N-phenyl-N'-1,2,3-thiadiazol-5-yl urea

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

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 the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF INHALED:
- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF IN EYES:
- 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.

IF ON SKIN OR CLOTHING:
- Take off contaminated clothing.
- Rinse skin immediately with plenty of water f or 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 73631-3 EPA Est. No. XXXX-XXX-XXX

NET CONTENTS: _____

Manufactured by:

SRM Chemical, Ltd.Co.
3027 Marina Bay Dr. Suite 110
League City, TX 77573
Phone: (281) 335-3646
Fax: (281) 335-3647
Web: www.srmchemical.com

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION:
Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing dust or spray mist. Avoid contact with skin, eyes and clothing. Do not contaminate food or feedstuffs.

EMERGENCY TELEPHONE NUMBERS:
(281) 335-3646 (Transportation and spills)
(800) 222-1222 (Poison Control Center, human health)
(800) 345-4735 (ASPCA, animal health)

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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 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 inter-tidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-waters. Do not apply when weather conditions favor drift from target area.

STORAGE AND DISPOSAL

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

STORAGE:
Store product in original container only, away from other pesticides, fertilizer, food or feed.

PESTICIDE 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 container into application equipment. Then dispose of empty container in a sanitary landfill. DO NOT REUSE EMPTY CONTAINER.

GENERAL INFORMATION

THIDIAZURON 50WP is designed to defoliate cotton (remove leaves and inhibit re-growth) to aid harvesting. THIDIAZURON 50WP is a wettable powder that can be applied by air or ground. Cotton leaf defoliation will take several days depending on weather conditions. Low temperatures require higher application rates and/or longer time to defoliate.

USE PRECAUTIONS

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

Rainfall within 24 hours after application will reduce the effectiveness of THIDIAZURON 50WP. Use only freshly prepared sprays. Do not store spray mixture overnight.

Do not feed foliage from treated cotton plants or gin trash to livestock.

PLANT BACK INTERVALS	
CROP	INTERVAL
Small grain, sorghum, corn or root crops (except carrots, onions, and sugar beets)	2 weeks
Legumes (including alfalfa) or leafy vegetables (except lettuce and spinach)	2 months
Sugar beets	4 months
Carrots, onions, or spinach	9 months
Lettuce	9 months and only after 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 THIDIAZURON 50WP adjacent to lettuce, citrus, or cantaloupe. Tank mixes with organophosphates may increase non-target crop phytotoxicity.
- Additionally, do not apply THIDIAZURON 50WP by air within one-half (1/2) mile of lettuce. Do not apply THIDIAZURON 50WP by ground equipment within 100 feet of lettuce.
- In addition, for citrus crops, do not apply THIDIAZURON 50WP by air when citrus in flush is within five (5) miles downwind of the point of application. Do not apply THIDIAZURON 50WP by ground when citrus in flush is within one-half (1/2) mile downwind of the point of application.

SPRAY DRIFT MANAGEMENT

Avoid spray drift to nearby crops as this product will cause modifications in plant growth. Small seeded crops such as lettuce, carrots, onions and spinach are especially sensitive. Plant injury or reduced yields will result.

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR.

The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target movement from aerial applications to agricultural field crops.

1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.

2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

AERIAL DRIFT REDUCTION ADVISORY

IMPORTANCE OF DROPLET SIZE:
The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (See Wind, Temperature and Humidity, and Temperature Inversions).

CONTROLLING DROPLET SIZE:
Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
Pressure - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
Number of Nozzles - Use the minimum number of nozzles that provide uniform coverage.
Nozzle Orientation - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produces the largest droplets and the lowest drift.
Boom length - Far some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length way further reduce drift without reducing swath width.
Application height - Applications should not be made at a height greater than 10 feet above the top of the target plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

SWATH ADJUSTMENT:
When applications are made with a crosswind, the swath will be displaced windward. Therefore, on the up and down edges of the field, the applicator should compensate for the displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with the increasing drift potential (higher wind, smaller drops, etc.).

WIND:
Drift potential is lowest between winds speeds of 2 - 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY:
When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS:
Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes email suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not

present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS:
The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non- target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

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 (RET) 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

TIME OF APPLICATION:
Make application to mature cotton when all bolls to be harvested are mature and at least 5 days prior to harvest. Degree and speed of defoliation will depend on level of cotton growth activity, ambient temperature, humidity levels within 5 days after application and moisture content in cotton foliage.

Low temperatures (less than 60°F) and drought stressed cotton can also adversely affect the level of defoliation and re-growth inhibition. If nightfall temperatures are less than 60°F before and immediately after application, consideration should be given to use of a tank mix with another defoliant or desiccant approved for use on cotton and that is less affected by cooler temperatures.

USE OF ADJUVANTS (CROP OILS):
Tank mixing THIDIAZURON 50WP with EPA approved petroleum-based crop oils will help offset the effects of low temperatures, drought stress or low humidity levels typical in some areas (i.e. desert Southwest area). Refer to the crop oil label for specific application rates.

MIXING INSTRUCTIONS:
1. Fill spray tank with 40-50% total amount of water required.
2. Start agitator.
3. Open container and empty contents to spray tanks.
4. Finish filling spray tank with balance of water with agitator running.

TANK MIX ADJUVANTS

Use of a surfactant or compatibility agent for tank mixes with other pesticides (especially organophosphates) will enhance tank clean out and increase defoliation. If applicator has no experience with a particular tank mix, a clear jar test of all ingredients should be performed. The jar test should duplicate the proposed tank mix in proper ratios and recommended order of addition.

Use only products that are exempt from tolerance under 40 CFR 180 .1001.

Always follow the mixing instructions on the label of the appropriate adjuvant.

APPLICATION:

Thorough coverage of cotton foliage is critical to maximize defoliation. Mix the labeled rate of THIDIAZURON 50WP in enough water to achieve complete coverage with spray equipment used. Spray mixture should be agitated constantly during application to insure consistent concentration. Apply in a minimum of 10 gallons per acre by ground and 2 gallons per acre by air.

DOSAGE:

The recommended application rate of THIDIAZIJRON 50WP is 0.2-0.4 lbs. per acre.

Rate should be adjusted to current and future weather conditions. As noted in Timing section, higher rates are recommended at lower temperatures (less than 65°F).

Two applications may be needed to defoliant rank cotton but do not exceed 0.6 lbs/acre total.

BOTTOM DEFOLIATION FOR USE IN ARIZONA ONLY:

THIDIAZURON 50WP can be used to defoliate the lower third of cotton plants to promote air circulation in the field that will reduce boll rot disease pressures.

Apply 0.1 lbs of THIDIAZURON 50WP per acre in a minimum of 10 gallons of water as a directed spray with ground equipment. Care should be taken to apply THIDIAZURON 50WP to prevent damage to the plants by the application equipment. Ground speed and appropriate dilution rate may need to be adjusted to minimize potential physical damage.

PRECONDITIONING FOR USE IN ARIZONA AND CALIFORNIA ONLY:

0.1 to 0.2 lbs of THIDIAZURON 50WP per acre may be applied as a pre-conditioner 7-14 days before the use of another cotton defoliant. Apply in a minimum of 10 gallons of water per acre by ground equipment and 2 gallons of water per acre by air. Refer to other defoliant for any applicable precautions.

TANK MIX OF THIDIAZURON 50WP PLUS ETHEPHON 6 or PREP FOR BOLL OPENING:

A tank mix of 0.1 to 0.4 lbs THIDIAZURON 50WP and 21 to 42 fluid ounces of ETHEPHON 6 (equivalent to 1.0 to 2.0 lbs active ingredient) per acre will enhance defoliation and accelerate boll opening. Use the higher rate of THIDIAZURON 50WP during cooler temperatures or if excessive re-growth is possible.

Do not use this tank mix before the optimal percentage of bolls in a field has matured. Premature application could result in a yield decrease. Certified cottonseed producers should confirm seed maturity before treatment.

Apply as a dilute spray as follows:

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

TANK MIX OF THIDIAZURON 50WP PLUS ETHEPHON 6 OR PREP[1] FOR DEFOLIATION ENHANCEMENT:

Apply 0.1 to 0.4 lbs of THIDIAZURON 50WP in a tank mix with 1/3 pint of ETHEPHON 6 (equivalent to 0.25 lbs active ingredient per acre) will increase defoliation but without undesirable accelerated boll opening. Ethephon may still be applied subsequently for boll opening. Users should refer to ETHEPHON 6 label for any seasonal application limits for all Ethephon use on cotton. Use the higher rate of THIDIAZURON 50WP during cooler temperatures or if excessive re-growth is possible.

TANK MIX OF THIDIAZURON 50WP PLUS DEF 6[2] OR THIDIAZURON 50WP PLUS FOLEX 6EC[3]:

Defoliation and re-growth inhibition will be improved during periods of cool weather (less than 60°F) with a tank mix of 0.1 to 0.4 lbs of THIDIAZURON 50WP and 0.5 to 2.0 pints of Def 6 (or Folex 6EC) per acre. Apply tank mix in a minimum of 10 gallons of water per acre by ground and 5 gallons of water per acre by air.

Use the higher rate of THIDIAZURON 50WP if excessive re-growth is expected due to high soil moisture and/or higher temperatures. Use the lower rate of Def 6 or Folex when nighttime temperatures remain above 65°F. To avoid plant desiccation, do not apply maximum rates of THIDIAZURON 50WP and phosphate based defoliants.

When mixing the tank mix spray solution, add the THIDIAZURON 50WP first (see Mixing Instructions) and then add the Def 6 or Folex after the THIDIAZURON 50WP has completely dispersed. If a second application of this tank mix is required, do not exceed a total THIDIAZURON 50WP application of 0.6 lbs per acre.

Refer to Def 6 or Folex labeling for additional use directions and cautions when using tank mixtures of THIDIAZURON 50WP and those products. DO NOT USE TANK MIX OF THIDIAZURON 50WP PLUS DEF 6 OR FOLEX IN THE RIO GRANDE VALLEY COUNTIES OF STARR, HIDALGO, WILLACY, AND CAMERON.

IMPORTANT CLEANOUT INSTRUCTIONS:

All spray equipment components containing spray solutions with THIDIAZURON 50WP should be cleaned as soon as possible after application. Care should be take to clean ALL components of equipment including (but not limited to) mix tanks, pumps, transfer lines, application tanks, sumps, booms and nozzles. Timely flushing of entire system while still wet with a commercial grade tank cleaner is strongly advised.

If spray solution is allowed to dry in any equipment component, small quantities may carryover and be released in subsequent applications and damage other crops. If spray residue is allowed to dry, flooding system with a dilute commercial tank cleaner and allowing to soak for several days will be necessary before using equipment again.

SEQUENTIAL APPLICATION PRECAUTION:

Application of THIDIAZURON 50WP to cotton subsequent to the application of a defoliant or desiccant spray that contains no Thidiazuron will result in reduced activity.

1) *Prep* is a trademark of Aventis Group
2) *Def 6* is a registered trademark of Bayer Corporation, Agricultural Chemical Division.
3) *Folex 6EC* is a registered trademark of Aventis CropScience.

IMPORTANT NOTICE

Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions and instructions specified on the label under normal conditions of use, but neither this warranty nor any other warranty of merchantability of fitness for a particular purpose, express or implied, extends to the use of this product, contrary to label instructions, or under abnormal conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

9/9

SRM Chemical, Ltd.Co.
3027 Marina Bay Drive Suite 110
League City, Texas 77573 USA
phone (281)335-3646
fax (281)335-3647
email srmchem@msn.com

December 16, 2004

U.S. EPA
Front End Processing Unit (7504C)
1801 South Bell Street
Arlington, VA 22202

Attn: Joanne I. Miller, Tel: (703) 305-6224

Re: EPA Registration Number 73631-3: Notification relating to Water Soluble Packaging

Dear Mrs. Miller,

Attached, please find notification requesting the extension of our label for the cotton defoliant Thidiazuron 50WP (73631-3) to include water soluble packaging. Please let me know if you require any additional information or documentation.

Sincerely,

Paul D Smith

Dr. Paul D. Smith
President