

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 29 1991

E. David Lewis
Pazianos Associates
1338 G Street, S.E.
Washington, D.C. 20003

Dear Mr. Lewis:

Subject: Weed Hoe 120
EPA Reg. No. 2853-30
Re: Revised Confidential Statement of Formula
Your submission dated May 15, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable subject to the comments listed below. Please note the Product Chemistry comments listed below in regards to your alternate Confidential Statement of Formula (CSF). A stamped copy is enclosed for your records. Please submit five of your final printed labeling incorporating these changes before releasing your product for shipment.

1. Please update your "Environmental Hazards" statement to read: Do not contaminate waters when disposing of equipment washwaters."
2. Please update your "waters" statement to read "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark."

Comments on Product Chemistry/Alternate Formulations

Your Confidential Statement of Formula (CSF) that you have **LABELED as ALTERNATE** (source A.I. 50534-16 and 42519-1) is acceptable.

3. In your letter dated May 15, 1991, you indicated that your "alternate" formulation (see CSF marked Alternate) is a repackage. The formulation which you have labeled as

CONCURRENCES

H7505C							
COLF							
9/21/91							

BASIC on your CSF form contains a source (63239-13) which has a different label claim from the other two i.e. EPA Reg. No. 50534-16 and 42519-1. If the formulation that you label as BASIC is not a repackage, it will be treated as a "Me-too" product and can not be considered in this submission.

Please clarify your Confidential Statements of Formula.

Sincerely,

Cynthia Giles-Parker

Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (H7505C)

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CRAB-E-RAD 120 LIQUID

FOR CONTROL OF CRAB GRASS IN ORNAMENTAL TURF

ACTIVE INGREDIENT:

Monosodium Acid Methanearsonate *..... 51.0Z

INERT INGREDIENT:..... 49.0Z

Total 100.0Z

*Total Arsenic as elemental,
all in water soluble form..... 23.61Z ✓

MSMA per gallon 6.6 lbs.

KEEP OUT OF THE REACH OF CHILDREN CAUTION:

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Wear protective clothing when handling or applying this product including long pants, long-sleeve shirt, and impermeable gloves and boots.

Harmful if swallowed or inhaled. Avoid breathing spray mist. (Coarse sprays are less likely to drift.) Avoid contact with eyes, skin or clothing. Causes eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and domestic animals off treated areas until washed into soil.

STATEMENT OF PRACTICAL TREATMENT

If swallowed, call a physician immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If on skin, wash with plenty of soap and water. Get medical attention if irritation persists.

If inhaled, remove victim to fresh air. Apply artificial respiration, preferably mouth to mouth, if indicated.

If in eyes, flush with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

Do not contaminate waters used by wildlife, aquatic life, domestic animals or waters used for irrigation. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

A Product Manufactured by The Vineland Chemical Co.

VINELAND CHEMICAL COMPANY

1611 W. WHEAT RD., VINELAND, NEW JERSEY 08360 • 609-691-3535



NET CONTENTS 5 GALLONS

EPA Reg. No. 2853-30
EPA Est. No. 2853-NJ-1

PRODUCT INFORMATION: FOR BEST RESULTS SOIL SHOULD BE MOIST AT TIME OF APPLICATION. Dry soil may not allow desirable turf to resist the action of chemicals. If soil is dry, first spray each acre (using 1/2 gallon of water containing 2 qts. of a suitable surfactant to 1 gallon of water. Apply to weeds when actively growing.

DIRECTIONS FOR USE

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

FOR BEST RESULTS SOIL SHOULD BE MOIST AT TIME OF APPLICATION. Dry soil may not allow desirable turf to resist the action of chemicals.

Use on Bermuda, Merion Blue, Kentucky Blue, Meadow Blue, and other fine fescue Bentgrass lawns when average daytime temperature is 60°F.

DO NOT use on St. Augustine, Carpet, Centipede, Bahama, and other coarse fescue Bentgrass putting greens.

1. Be sure soil is moist before treatment.
2. Do not water for 24 hours after treatment, then resume watering especially during hot, dry weather.

RATE OF APPLICATION

Rate	Amount Water
1 fluid ounce	2.5 Gallons
3 pints	50-100 Gallons

Two applications five to seven days apart are generally recommended using commercial spray equipment both water and chemical. If spray equipment can wet grass thoroughly. CRAB-E-RAD 120 is effective at the above rate if applied at a higher rate. For temperatures below 60°F. use twice the above rate to treat the same area.

To decrease run-off and increase leaf absorption, add a surfactant with each gallon of CRAB-E-RAD 120 at the time of application. Clean equipment after use by flushing with water. Do not spray or allow to drift onto desirable flowers, shrubs, trees, or streams. Coarse sprays are less likely to injure desirable plants or seeds.

Do not apply with hose-end applicators.

STORAGE AND DISPOSAL

PROHIBITION: Do not store near feed or food products.
PESTICIDE DISPOSAL: Do not contaminate water bodies or dispose of in water. Pesticide wastes are toxic. Improper disposal, or reuse is a violation of Federal Law. If disposal is required, contact the Environmental Control Agency, or the Hazardous Waste Management and Emergency Response (HWEM) Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent) and reuse for equivalent purposes, or puncture and dispose of in a sanitary landfill, or by other means allowed by state and local authorities, by burning.

NOTICE: Buyer assumes all responsibility for safety and proper use of this product. See directions.

BEFORE USING ANY HERBICIDE, STOP

REGISTRATION REPORT

ACCEPTED
with COMMENTS
In EPA Letter Dated:

AUG 29 1991

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

2853-30

1977

DAL-E-RAD 120

LIQUID HERBICIDE

FOR DALLISGRASS CONTROL IN BERMUDA TURF LAWNS

ACTIVE INGREDIENT:

Monosodium Acid Methanearsonate* 51.0%

INERT INGREDIENTS: 49.0%

TOTAL 100.0%

* Total Arsenic, as elemental,

all in water soluble form 23.61% ✓

MSMA per gallon 6.6 lbs.

**KEEP OUT OF REACH OF CHILDREN
CAUTION:**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Wear protective clothing when handling or applying this product including long pants, long-sleeve shirt, and impermeable gloves and boots. Harmful if swallowed or inhaled. Avoid breathing spray mist. (Coarse sprays are less likely to drift.) Avoid contact with eyes, skin or clothing. Causes eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and domestic animals off treated areas until washed into soil.

STATEMENT OF PRACTICAL TREATMENT

If swallowed, call a physician immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin, wash with plenty of soap and water. Get medical attention if irritation persists.

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NET CONTENTS 5 GALLONS

EPA Reg. No. 2853-30
EPA Est. No. 2853-NJ-1

If inhaled, remove victim to fresh air. Apply artificial respiration, preferably mouth to mouth, if indicated.
If in eyes, flush with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

Do not contaminate waters used by wildlife, aquatic life, domestic animals or waters used for irrigation. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

PRODUCT INFORMATION: FOR BEST RESULTS SOIL SHOULD BE MOIST AT THE TIME OF APPLICATION. Dry soil may not allow desirable turf to resist the action of chemicals. If soil is dry, first spray each acre (using fine spray or mist) with 50 gals. of water containing 2 qts. of a suitable surfactant to assist penetration of irrigation water. Apply to weeds when actively growing.

DIRECTIONS FOR USE

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

RECOMMENDED RATES TO TREAT ONE (1) ACRE

Mix at rate of 2 1/2 pints DAL-E-RAD 120 in 40 gallons of water. Thoroughly mix by agitation or recirculating solution in spray tank prior to application. To decrease run-off and increase effectiveness of leaf absorption, add 1 to 2 pints of a suitable surfactant to this mixture. Two or more treatments 5 to 7 days apart may be necessary. DAL-E-RAD 120 is effective at above rates if air temperature is 80°F. or higher. For temperatures below 80°F. use twice the amount of DAL-E-RAD 120 to treat the same area. Do not apply with hose-end applicators. **IMPORTANT:** Do not water for at least 24 hours after treatment. Do not use on ST. AUGUSTINE, CARPET OR CENTIPEDE GRASSES. Clean equipment after use by rinsing with water. Use DAL-E-RAD 120 along drainage ditchbanks, rights-of-way, implement storage yards and similar non-crop areas where cultivation is not practical. Mix at the rate of 2 1/2 pints of DAL-E-RAD 120 in 40 gallons of water and 2 pints of a suitable surfactant to treat one acre. Do not spray or allow to drift onto desirable flowers, trees, shrubs, vegetables, or into lakes or streams. Coarse sprays are less likely to drift. Do not store near fertilizer, fungicides, insecticides or seeds.

STORAGE AND DISPOSAL

PROHIBITION: Do not store near feed or food products.
PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are toxic. 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). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.
NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

BEFORE USING ANY HERBICIDE, STOP AND READ THE LABEL.

WEED-HOE 120

Liquid MSMA For Selective Weed Control
LIQUID HERBICIDE

ACTIVE INGREDIENT:

Monosodium Acid Methylarsenate*

51.0Z

INERT INGREDIENTS:

49.0Z

TOTAL 100.0Z

*Total Arsenic, as elemental, all in water soluble form 23.61Z
*Equivalent to 6.6 lbs. Monosodium Acid Methylarsenate per gallon

**KEEP OUT OF REACH OF CHILDREN
CAUTION:**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Wear protective clothing when handling or applying this product including long pants, long sleeve shirt, and impermeable gloves and boots. Mixer loaders should include an apron and full-face shield when handling or mixing concentrate. Flagmen should be fully protected during spray operations or mechanical flagmen used. Pilots and ground spray rig applicators should wear a mask or respirator approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health.

Harmful if swallowed or inhaled. Avoid breathing spray mist. (Coarse sprays are less likely to drift.) Avoid contact with eyes, skin or clothing. Causes eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and domestic animals off treated areas until washed into soil.

STATEMENT OF PRACTICAL TREATMENT

If swallowed, call a physician immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If on skin, wash with plenty of soap and water. Get medical attention if irritation persists.

If inhaled, remove victim to fresh air. Apply artificial respiration, preferably mouth to mouth, if indicated.

If in eyes, flush with plenty of water. Get medical attention if irritation persists.

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NET CONTENTS 5 GALLONS

EPA Reg. No. 2853-30
EPA Est. No. 2853-NJ-1

ENVIRONMENTAL HAZARDS

Do not contaminate waters used by wildlife, aquatic life, domestic animals or waters used for irrigation. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

PRODUCT INFORMATION: WEED-HOE 120 is a liquid contact herbicide used post-emergence for selective weed control. For best results apply to weeds when actively growing. The addition of a suitable surfactant to the spray solution improves wetting for maximum control. Mix spray solution thoroughly before application. Calibrate spray equipment for best results and greatest economy. Clean equipment after use by flushing with water. Run rinse water in area away from domestic water sources.

DIRECTIONS FOR USE

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

GENERAL WEED CONTROL (Non-Crop): WEED-HOE 120 may be used along drainage ditch banks, rights of way, implement storage yards and similar non-crop areas. Effective for the control of Johnsongrass, goosegrass, nutgrass (nutsedge), green and yellow foxtail and similar weeds. To treat one acre, mix 2½ pints WEED-HOE 120 plus 1 quart of a suitable surfactant in 40 gallons of water and apply entire mixture broadcast, thoroughly wetting foliage and stems. A second application may be required if regrowth occurs.

COTTON: WEED-HOE 120 used post-emergence will control Johnsongrass, cocklebur, nutsedge, dallisgrass and nutgrass. Mix at rate of 2½ pints of WEED-HOE 120 plus 2 pints of a suitable surfactant in 40 gallons of water. Add WEED-HOE 120 to water in tank, thoroughly mix by agitation, add surfactant and complete mixing by recirculating solution prior to application. Apply solution at the rate of 40 gallons per acre. For band application of cotton grown in 40 inch rows, apply 1 gallon of spray solution per inch of band width per acre. (Example: For 12 inch band apply 12 gallons per acre.) Direct spray to weeds when cotton is 3 inches high and up to first bloom. Do not apply after first bloom. Adjust spray nozzles to allow thorough coverage of weeds avoiding spraying of cotton foliage. Use fan type nozzle, low volume sprayer. (25 lbs. or less pressure). A second application may be required should regrowth occur. Re-apply 1-3 weeks after first treatment. Do not feed treated foliage to livestock or graze treated areas.

STORAGE AND DISPOSAL

PROHIBITION: Do not store near feed or food products.

PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are toxic. 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). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

BEFORE USING ANY HERBICIDE, STOP AND READ THE LABEL

WEED-E-RAD 120

LIQUID

FOR CONTROL OF JOHNSON GRASS
AND OTHER WEEDS IN COTTON

ACTIVE INGREDIENT:	
Monosodium Acid Methanearsonate *	51.0Z
INERT INGREDIENTS:	49.0Z
	<u> </u>
Total.....	100.0Z

* Total Arsenic, as elemental, all in water soluble form 23.61%
Equivalent to 8.6 lbs. Monosodium Acid Methanearsonate per gallon

**KEEP OUT OF REACH OF CHILDREN
CAUTION:**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Wear protective clothing when handling or applying this product including long pants, long sleeve shirt, and impermeable gloves and boots. Mixer-loaders should include an apron and full face shield when handling or mixing concentrate. Flagmen should be fully protected during spray operations or mechanical flagmen used. Pilots and ground spray rig applicators should wear a mask or respirator approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health.

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Do not contaminate water by cleaning of equipment or disposal of wastes.

PRODUCT INFORMATION: WEED-E-RAD 120 is a quick contact herbicide used post-emergence for selective weed control. For best results apply to weeds when actively growing. The addition of a suitable surfactant to the spray solution improves wetting for maximum control. Mix spray solution thoroughly before application. Calibrate spray equipment for best results and greatest economy. Clean equipment after use by flushing with water.

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