



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

JAN 25 1994

Elizabeth D. Owens
ISK BIOTECH CORP
5966 Heisley Road - Box 8000
Mentor, OH 44061

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

**Subject: Label Amendment Submission of 09/02/93 in Response to PR Notice 93-7
EPA Reg. No. 50534-31
SUPER ARSONATE**

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- **BEFORE** selling or distributing any product bearing the final printed labeling
- AND**
- **WITHIN** one year from date of this acceptance.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

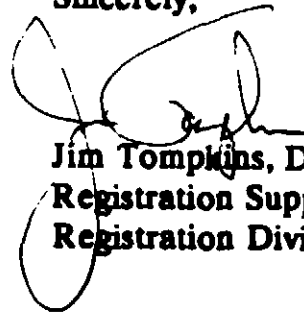
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Tompkins", is written over the typed name and title.

Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

30110

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division**

Elizabeth D Owens
ISK BIOTECH CORP
5966 HEISLEY ROAD BOX 8000
MENTOR OH 44061

Subject: Label Amendment Submission of 09/02/93
to Comply with WPS Labeling Requirements
EPA Reg Nr. 50534-31
SUPER ARSONATE

The following specific comments pertain to your
WPS labeling submission concerning the product
cited above:

There is a typographical error(s) in the PPE statements
that you added to the Precautionary Statements.

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Super Arsonate

Net Contents: 30 Gallons/114 Liters

Net Contents: 55 Gallons/208 Liters

For Postemergence Weed Control

Product Contains 8.0 Pounds MSMA Per Gallon

Active Ingredient: Monosodium Acid Methanearsonate 58.2%

Inert Ingredient: 41.8%

Total: 100.0%

Total Arsenic, all in water-soluble form, expressed as elemental 26.9%

Keep Out of Reach of Children

CAUTION:

See side panel for additional precautionary statements

ISK Biotech Corporation
5966 Heisley Road
P.O. Box 8000
Mentor, Ohio 44061-8000

EPA Reg. No. 50534-31
EPA Est. No. 50534-TX-01
3698-0000-9025-9307

ACCEPTED
with COMMENTS
In EPA Letter Dated

JAN 25 1994

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

50534-31

Precautionary Statements**Hazards to Humans and Domestic Animals****CAUTION**

Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin or clothing. Avoid breathing vapors or spray mist.

If swallowed, induce vomiting immediately by giving two glasses of water and sticking finger down throat. NEVER give anything by mouth to an unconscious person. Seek medical attention.

In case of contact, flush eyes with plenty of water for at least 15 minutes. Seek medical attention.

Wash exposed skin gently with plenty of soap and water.

~~Keep children and domestic animals off treated areas until this material has been washed into the soil.~~

~~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.~~

Personal Protective Equipment:

Applicators and other handlers must wear:

- * Long-sleeved shirt and long pants
- * Waterproof gloves
- * Chemical-resistant footwear plus socks
- * Protective eyewear
- * Chemical-resistant apron when cleaning equipment, mixing or loading

For exposures in enclosed areas:

- * A respirator with either an organic vapor-removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

For exposure outdoors:

- * Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

BEST AVAILABLE COPY

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.

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 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.*

Environmental Hazards

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 by disposal of equipment washwaters.

DO NOT feed treated foliage to livestock or graze treated areas.

DO NOT spray or allow drift onto vegetables, ornamentals or other desirable plants. DO NOT apply when weather conditions favor drift from target area.

DO NOT contaminate water by cleaning of equipment or disposal of wastes.

Super Arsonate

Read entire label before using this product.

General Information

SUPER ARSONATE is a postemergence herbicide for use in cotton, turf, fruit, nuts and non-crop areas. SUPER ARSONATE does not contain a surfactant (wetting agent). A suitable non-ionic surfactant must be added to the spray tank to obtain satisfactory results. Local conditions and recommendations vary; consult local agricultural experiment station or extension service weed specialists for recommendations in your area.

A partial list of weeds controlled with SUPER ARSONATE includes:

Barnyardgrass	Crabgrass	Nutsedge
<u>Brachiaria</u> spp.	Foxtail	Pigweed
Chickweed	Goosegrass	Puncturevine
Cocklebur	Johnsongrass	Sandbur

Mixing Instructions: Fill the spray tank with half the required amount of water and, with pump or agitator operating, add the recommended amount of SUPER ARSONATE herbicide and continue filling the tank with the balance of water. Add surfactant and mix thoroughly before using.

DO NOT store spray solution in tank overnight. Clean application equipment thoroughly after use by flushing with water in a safe place.

Application Methods: SUPER ARSONATE should be applied with a low-pressure, properly calibrated sprayer having satisfactory pumping and bypass action. ADJUST NOZZLES TO KEEP SPRAY OFF COTTON FOLIAGE AND IN A MANNER TO ALLOW MAXIMUM COVERAGE OF WEEDS. Adequate coverage is very important for effective weed control.

Apply during warm weather when weeds are in an active stage of growth.

Storage and Disposal:

DO NOT contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Disposal: Wastes resulting in the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: DO NOT reuse empty container. Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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. 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 12 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
- * Chemical-resistant footwear plus socks
- * Protective eyewear

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep children and domestic animals off treated areas until this material has been washed into the soil.

DO NOT apply this product through any type of irrigation equipment.

Cotton: SUPER ARSONATE is useful as a directed postemergence spray for control of the weeds listed above. Mix SUPER ARSONATE at the rate of 1 quart plus 1 to 2 quarts of a suitable surfactant, cleared for application to growing crops, in 40 gallons of water for application as a DIRECTED broadcast spray to one acre when weeds are small. For band applications, apply 1 gallon of above diluted spray per acre for each 1 inch band width to be treated of cotton grown on 40 inch row spacing. A second or repeat

application, if needed, should be timed about 1 to 3 weeks after the first application. Keep spray off cotton foliage.

Apply Only When Cotton is 3 Inches High to First Bloom. DO NOT Apply After First Bloom.

Slight burning and reddish discoloration of cotton foliage may occasionally be seen following recommended treatment; however, cotton plants will develop normally and yield will not be affected.

Emergency Preplant Application: When planting of cotton to prepared seedbeds has been delayed and weeds have emerged, one application of SUPER ARSONATE at the above rate with surfactant can be made prior to seeding.

NOTE: Applications to cotton in Florida should be confined to band treatment.

Ornamental Turfgrass: SUPER ARSONATE can be used for selective control of bahiagrass, barnyardgrass, chickweed, smooth and large crabgrass, dallisgrass, nutsedge, sandbur and wood sorrell with little or no injury to well-established, actively-growing turfgrasses. Mow turfgrasses to height of 1 to 1-1/2 inches before treatment. Mix 1 quart of SUPER ARSONATE plus 1 to 2 pints of suitable surfactant in 150 gallons of water for application to an area of one acre. Application should be uniform and thorough to adequately wet all undesirable plants. Make applications during warm weather when temperature is between 80 and 90°F. DO NOT water turf for at least 24 hours after application. Turfgrasses may be temporarily discolored. Bermudagrass, bluegrasses and zoysiagrass have shown tolerance to properly applied SUPER ARSONATE. Injury may result if applied to bentgrasses and fescues. DO NOT apply to St. Augustinegrass, carpetgrass, centipedegrass or to Dichondra. DO NOT reseed until two weeks after last application. DO NOT apply with hose-end applicators.

Non-Bearing Fruit and Nuts: SUPER ARSONATE is effective as a directed postemergence spray for control of the above listed weeds in non-bearing almonds, walnuts, grapefruit, lemon, lime, orange and tangerine orchards and plantings of non-bearing apples, cherries, peaches, pears, plums and prunes. Mix at rate of 1 quart of SUPER ARSONATE plus 1 to 2 quarts of a suitable surfactant in 100 gallons of water and apply to an area of one acre. For spot treatment of weeds, mix 1 quart of SUPER ARSONATE plus 1 to 2 quarts of a suitable surfactant in 50 gallons of water and apply to point of run-off. Application should be made when weeds are small, or during warm weather and when conditions are favorable for good weed growth. If regrowth occurs, repeat applications should be made, but not more than three applications per year. DO NOT allow spray solution to contact foliage, stems, bark of trees or vines. DO NOT use around trees or vines from which crops will be harvested within one year. DO NOT graze treated areas. In Florida, use only as a spot treatment.

Non-Crop: SUPER ARSONATE is effective in controlling the above listed weeds and many similar weeds on drainage ditchbanks, fence rows, rights-of-way, storage yards and similar non-crop areas. Application should be made when weeds are small and conditions are favorable for good weed growth. Mix at a rate of 2-1/2 pints SUPER ARSONATE plus 1 to 2 quarts of suitable surfactant in 50 gallons of water. Spray undesirable vegetation thoroughly to point of run-off. Adequate coverage and complete wetting of foliage is important for effective control. Repeat applications may be necessary if regrowth occurs. DO NOT contaminate waters used for domestic purposes, or by animals, including wildlife and aquatic life, or water used for irrigation purposes.

Warranty and Limitation of Damages

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Buyer assumes the risk of any use contrary to such directions. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY, AND NO AGENT OF SELLER IS AUTHORIZED TO DO SO. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.