JUL 19 1994

Elizabeth D. Owens, Ph.D. Manager, Product Registrations ISK Biosciences Corporation 5966 Heisley Road P.O. Box 8000 Mentor, Ohio 44061-8000

Dear Dr. Owens:

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Subject: Buenc - EPA Reg. No. 50534-18

DSMA Liquid - EPA Reg. No. 50534-27 Super Arsonate - EPA Reg. No. 50534-31 Ansar 529 H.C. - EPA Reg. No. 50534-41 Ansar DSMA Liquid - EPA Reg. No. 50534-42 Ansar 8100 Herbicide - EPA Reg. No. 50534-46

Ansar 529 H.C. (Southern Formula) EPA Reg. No. 50534-53

DSMA 4 - EPA Reg. No. 50534-158 Liquid DSMA - EPA Reg. No. 50534-186 Label Revisions - PPE Statements Your Applications Dated 6/22/94

The labeling for EPA Rcg. Nos. 50534-18, -31, -41, and -53, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Submit five (5) copies of your finished printed labeling.

The labeling for EPA Reg. Nos. 50534-27, -42, -46, -53, -158, and -186, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

For EPA Reg. Nos. 50534-42, and -46 revise the first sentence under ENVIRONMENTAL HAZARDS to read, "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mar,. Do not contaminate water by disposal of equipment washwaters."

For EPA Reg. Nos. 50534-27 and -158 under Container Refilling and Cleaning, in the first sentence replace "Biotech's" with "Biosciences'".

For EPA Reg. No. 50534-186, under **Statement of Practical Treatment**, delete "Immediately remove contaminated clothing, INCLUDING SHOES, and" from the **If Spilled on Skin** instruction.

Sincerely Yours,

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Cynthia Giles-Parker Product Manager (22) Fungicide-Herbicide Branch Registration Division (7505C)

Enclosures

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Ansar 8100

Net Contents: 7 Pounds

Herbicide

High Concentrate DSMA Powder For Selective Post-Emergent Weed Control

Active Ingredient: Disodium Methanearsonate* 81.0% Inert Ingredients: 19.0% Total:

Total Arsenic all in water-soluble form, expressed as elemental 33.0% *Product equivalent to 128.5% Disodium Methanearsonate Hexahydrate Keep Out of Reach of Children

CAUTION:

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See back panel for additional precautionary statements

ISK Biosciences Corporation 5966 Heisley Road, P.O. Box 8000 Mentor, Ohio 44061-8000 EPA Reg. No. 50534-46 EPA Est. No. 42519-IS-1 3170-3007-9102-9106

ACCEPTED with COMMENTS In EPA Letter Dated:

JU 1994

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

50534-46

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 dust 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.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear:

- * Long-sleeved shirt and long pants
- * Waterproof gloves

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- * Chemical-resistant footwear Shoes plus socks
- * Protective eyewear
- * Chemical-resistant apron when cleaning equipment, mixing or loading

For exposures in enclosed areas:

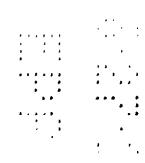
* A respirator with either an organic vapor-removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

For exposures outdoors:

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

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. 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.

Ansar® 8100 Herbicide Read entire label before using this product.

General Information

ANSAR 8100 Herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. Its activity is enhanced by addition of a suitable surfactant to the spray solution. It is most effective on young, actively growing weeds at air temperatures above 70°F. Its phytotoxic properties are quickly inactivated on contact with the soil.

Mixing Instructions

ANSAR 8100 Herbicide is completely water soluble. However, the need for proper mixing is essential to prevent lumping of the powder. Fill the spray equipment tank with at least 80% of the required amount of water and add the required amount of ANSAR 8100 slowly, with agitation. With continued agitation add the required amount of a mild approved agricultural surfactant and the remainder of the water. Do not store spray solution in tank for a prolonged period and clean application equipment thoroughly after using by flushing with water. Although ANSAR 8100 Herbicide is only moderately corrosive, do not use in galvanized or aluminum equipment.

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 <u>12</u> 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

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- * Waterproof gloves
- * Chemical-resistant-footwear-Shoes 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: ANSAR 8100 Herbicide is useful as a topical or directed spray application in cotton for post-emergent control of weeds and grasses including johnsongrass, nutsedge, dallisgrass, cocklebur, ragweed, sandbur and puncturevine. ANSAR 8100 Herbicide should be applied to weeds in cotton at the rate of 28 pounds per acre.

If ANSAR 8100 Herbicide is to be applied topically (by either ground or aerial application), then a second directed application, one to three weeks after the first, may be made if regrowth occurs.

If ANSAR 8100 Herbicide is not applied topically, then one directed application of ANSAR 8100 Herbicide may be made, followed one to three weeks after the first, with a second directed application of either ANSAR 8100 or ANSAR 529 H.C.

MIXING INSTRUCTIONS: Topical by ground equipment - Mix 7.0 pounds of ANSAM 8100 in 100 gallons of water and add one to two quarts of a mild agricultural surfactant, cleared for application to growing crops, suitable for use on cotton. Apply 40 gallons of spray solution per treated acre. For topical band application in 40 inch row cotton, apply one gallon of spray for each inch of band width per acre.

Apply only when cotton has 1-2 true leaves to first square. Do not feed treated foliage to livestock, or graze treated areas.

AERIAL APPLICATION: Apply at the rate of 2.8 pounds of ANSAR 8100 Herbicide per acre. Mix 28 pounds of ANSAR 8100 and one quart of a mild agricultural surfactant, cleared for application to growing crops, for use on cotton in 50 gallons of water and apply at 5 gallons per acre. When humidity is low, mix 28 pounds of ANSAR 8100 and one quart of surfactant in 100 gallons of water and apply at 10 gallons per acre.

Do not apply by air on windy days or in such a manner as will allow spray drift to come in contact with adjacent crops on non-target areas. Do not make topical applications to cotton when drought condition or cool temperatures prevail. Apply topically only when cotton has 1-2 true leaves to first square formation.

Do not make topical applications after first square.

DIRECTED APPLICATIONS: Mix at the rate of 7.0 pounds in 100 gallons of water and add one to two quarts of a mild surfactant, cleared for application to growing crops. Apply at a broadcast rate of 40 gallons per treated acre. For band applications in 40 inch rows, apply one gallon of spray solution per inch of band width per acre of cotton.

Apply only when cotton is 3 inches high to first bloom. Do not apply after first bloom. Do not feed treated foliage to livestock, or graze treated areas.

Slight burning and a reddish discoloration of the cotton leaf may occasionally occur following the recommended treatment, but the cotton plant will develop normally. ANSAR 8100 Herbicide should be applied with a low volume sprayer, with satisfactory pumping and by-pass action.

CITRUS-BEARING AND NON-BEARING (Except Florida): ANSAR 8100 Herbicide is useful as a directed application in citrus orchards, such as orange, grapefruit, tangerine, lemon and lime orchards. It should be applied at the rate of 3 to 6 pounds per acre. Mix ANSAR 8100 Herbicide at the rate of 3 to 6 pounds, plus 1 to 2 quarts of a suitable surfactant, in 100 gallons of water. Apply as a directed spray in interspaces and around base of trees. Spray unwanted vegetation to just short of run-off. If regrowth occurs, reapply as required, however, do not exceed 3 applications per year.

Do not allow spray solution to contact fruit, leaves, stems or bark. Use a shield, if necessary, for nursery plantings or young trees.

NON-CROP: ANSAR 8100 Herbicide is useful for controlling johnsongrass, nursedge, and similar weeds on drainage ditch banks, rights-of-way, storage yards, and similar non-crop areas. Mix ANSAR 8100 Herbicide at the rate of 3 to 6 pounds, plus 1 to 2 quarts of a suitable surfactant in 100 gallons of water. Spray the unwanted vegetation thoroughly to just short of run-off. Any spray equipment that gives good coverage may be used. If regrowth occurs, reapply as required.

Do not contaminate waters used for domestic consumption, or by animals, wildlife and aquatic life, or for irrigation purposes.

LAWN AND ORNAMENTAL TURF: ANSAR 8100 Herbicide is designed, for the selective kill of dallisgrass, sandbur, bahiagrass, nutsedge, crabgrass, chickweed and wood sorrel with little or no injury to tolerant iawn grasses. On new lawns, do not treat until after three mowings. Tolerant grasses may be temporarily affected, especially in hot weather. Rain or waterings will revive them. Bent and fescue grasses are generally more sensitive, and may be temporarily discolored. Zoysia, bluegrasses, and bermuda are tolerant. Do not use on St. Augustine or centipede. Mow lawns 1 to 1-1/2 inches high before treatment. Mix 1.5 ounces of ANSAR 8100 Herbicide in 2-1/2 gallons of water, containing 2 to 3 fluid ounces of a suitable surfactant, and apply to an area of 1000 sq. ft. Spray thoroughly to wet all undesirable plants. Repeat applications, 10 to 14 days apart, may be needed for good control.

DO NOT apply with hose-end applicators.

Storage and Disposal

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

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: DO NOT reuse empty container. Completely empty bag into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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 EXCEPT IN WRITING WITH A SPECIFIC REFERENCE TO THIS WARRANTY. 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.

Buyers and users of this product are responsible for all loss or damage from use or handling of this product which results from conditions beyond the control of Seller, including, but not limited to, incompatibility with other products unless otherwise expressly provided in the Directions for Use of this product, weather conditions, cultural practices, moisture conditions or other environmental conditions outside of the ranges that are generally recognized as being conductive to good agricultural and/or horticultural practices.