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

Dear Dr. Owens:

SUBJECT: PICKALL Cotton Defoliant
EPA Reg. No. 50534-107
MAD Herbicide
EPA Reg. No. 50534-49 ✓
Label Amendments - Updated Labeling
Your Application & Letter Dated 5/12/94

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. A stamped copy is enclosed for your records. Submit five (5) copies of your final printed labeling prior to releasing the products for shipment.

PICKALL Cotton Defoliant

Under "Personal Protective Equipment", and in the "Agricultural Use Requirements" box, at the third asterisk, replace "chemical resistant footwear" with "shoes plus". You may delete the respirator statements from the PPE section as they are not required for this product.

Under "Environmental Hazards", revise the third sentence to read, "Do not contaminate water by disposal of equipment washwaters."

Under "Preparation of the Spray", in the fourth sentence, correct the spacing between "use" and "in".

20417

MAD Herbicide

Under "Environmental Hazards", delete the seventh sentence as it is redundant with the third sentence in this section.

Sincerely Yours,

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

Enclosures

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Jacket 3071

MAD®
Herbicide

MSMA Plus 2,4-D Liquid Suspension
For Selective Post-Emergent Weed Control

Active Ingredient:

Monosodium Acid Methanearsonate 34.5%

2,4-Dichlorophenoxyacetic Acid, Sodium Salt 9.5%

Inert Ingredients: 56.0%

Total 100.0%

Total Arsenic, all in water-soluble form, expressed as elemental 16.0%

Product Contains 4.0 Pounds MSMA and 1.0 Pound 2, 4-D acid equivalent Per Gallon.

Keep Out of Reach of Children

CAUTION:

See side panel for additional precautionary statements.

ISK ~~Biotech~~ Biosciences Corporation

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EPA Reg. No. 50534-49

EPA Est. No. 50-534-TX-01

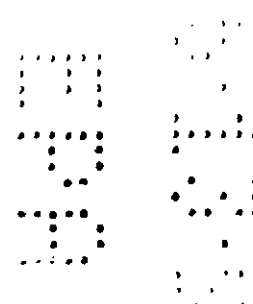
MAD® is a registered trademark of ISK ~~Biotech~~ Biosciences Corporation.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

NOV 1 1994

Herbicide
FIFRA Act
EPA Reg. No.
EPA Est. No.

50534-49



4047

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.

✓ When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection.

) After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

A mechanical system (probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

Wash exposed skin gently with plenty of soap and water.

Keep children and domestic animals off treated areas until the material has been washed into the soil. DO NOT allow people (other than applicator) or pets on treatment areas during application. DO NOT enter treated areas until spray has dried.

✓ Wear protective clothing when handling or applying this product including long pants, long-sleeved 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.

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.

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Environmental Hazards

Drift or runoff may adversely affect non target plants.

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 washwater. DO NOT feed treated foliage to livestock or graze treated areas. DO NOT 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 or equipment or disposal of wastes.

DO NOT spray when the wind is blowing towards susceptible crops or ornamental plants. Use coarse sprays to minimize drift. Spray drift can be lessened by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by using no more than 20 pounds spray pressure with flat fan or flooding flat fan nozzle tips; by spraying when wind velocity is low; and by stopping all spraying when wind exceeds 8 miles per hour. DO NOT apply with hollow cone-type insecticide or other nozzles that produce a fine droplet spray. DO NOT use the same spray equipment for applying other materials to 2,4-D susceptible crops as injury may result.

Read entire label before using product.

General Information

✓ ? MAD Herbicide is useful for selective post-emergent control of common lawn weeds, such as dallisgrass, dandelion, plantain and chickweed.

It is also useful for the control of a wide variety of weeds in non-crop areas, such as railroad rights-of-way, roadsides and storage areas. It is a combination of MSMA, 2,4-D and surfactant. It is unnecessary to add any other surfactant to the spray solution. Best results are obtained on young actively growing weeds at air temperatures above 70°F.

Mixing Instructions: MAD Herbicides must be thoroughly dissolved. Fill the spray equipment reservoir about half full with water and add the required amount of herbicide with agitation. Finish filling the reservoir with water and apply. After use, clean equipment thoroughly by washing with water containing an active detergent followed by a rinse with one percent ammonia solution. DO NOT use equipment for other purposes until it has been thoroughly cleaned. DO NOT store spray solution in tank for a prolonged period.

Directions For Use:

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

DO NOT apply 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.

Non-Crop: MAD Herbicide is a contact herbicide useful for controlling annual broadleaf weeds and grasses, such as puncture vine, wild mustard, wild oats, chickweed, sandbur, common ragweed, pigweed, giant foxtail and yellow foxtail and to top-kill certain perennials such as johnsongrass, dallisgrass, nutsedge and tulle.

MAD Herbicide is recommended for control of weeds along rights-of-way of railroads, highways, utility lines and pipelines, and other areas such as storage grounds, around power plants and buildings, and along fences, sidewalks, driveways and parkways. It should be applied at the rate of 1/2 to 1 gallon per acre.

? correct location - wps

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Mix MAD Herbicide at a rate of 1/2 to 1-1/2 gallons in 100 gallons of water. Spray unwanted vegetation thoroughly to just short of run-off. Any spray equipment that gives good coverage may be used. Coarse sprays are less likely to drift. If regrowth occurs, reapply as required.

2. [For use on plants in non-crop and non-timber areas only. Not for use on crops, timber or other plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.]

DO NOT ALLOW SPRAY TO DRIFT ONTO CROP AREAS. DO NOT CONTAMINATE WATER USED FOR DOMESTIC CONSUMPTION, OR BY ANIMALS, WILDLIFE AND AQUATIC LIFE, OR FOR IRRIGATION PURPOSES. DO NOT ALLOW LIVESTOCK TO GRAZE TREATED AREAS.

) **Lawn and Ornamental Turf:** Determine the area to be treated and prepare the solution accurately. Apply with either tank type ^{sprayer?} or hose-end sprayer, adjusting for coarse spray to prevent drift which could damage near by desirable plants. For Spring and Fall application, dissolve 2 fluid ounces (4 tablespoons) MAD Herbicide in 2-1/2 gallons of water and apply to an area of 1000 square feet. For Mid-Summer application, dissolve 1-1/2 fluid ounces (3 tablespoons) of MAD Herbicide in 2-1/2 gallons of water ^{5 gals?} and apply to an area of 1000 square feet. Apply when weeds are young and actively growing. Good soil moisture gives best results. Water before application if soil is dry. Repeat applications at one week intervals results in better control than an excessive single dose. Bent and fescue grasses may be temporarily affected, especially in hot weather in dry soil. DO NOT apply to newly seeded lawns. DO NOT use on St. Augustinegrass, centipedegrass, dichondra or clover lawns. DO NOT apply with hose-end applicators. ^{OK per 6/20/86 ltr} The maximum number of broadcast applications is two per year. DO NOT ALLOW SPRAY TO DRIFT INTO CONTACT WITH TREES, ORNAMENTAL, PLANTS OR VEGETABLE GARDENS. TYPICAL 2,4-D INJURY MAY RESULT FROM MISAPPLICATION.

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Storage and Disposal

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

Pesticide 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: 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 by other procedures approved by state and local authorities.

1/04/97

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 produce, weather conditions, cultural practices, moisture conditions or other environmental conditions outside of the ranges that are generally recognized as being conducive to good agricultural and/or horticultural practices.

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