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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:

Subject: Monex 3 Herbicide  
EPA Reg. No. 50534-50  
Ansar 8100 Herbicide Southern Formulation  
EPA Reg. No. 50534-52  
Ansar 170 H.C. Herbicide Southern Formulation  
EPA Reg. No. 50534-54  
Kacodil Herbicide  
EPA Reg. No. 50534-106 ✓  
Label Revisions  
Your Applications & Letters 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 product for shipment.

Except for EPA Reg. No. 50534-106, you should delete the statement "**DO NOT** contaminate water by cleaning of equipment or disposal of wastes" under **Environmental Hazards**, as it is redundant with the second sentence under this section. You must also revise your labels as required by the WPS label acceptance letter dated 5/26/94, and 5/31/94 for EPA Reg. No. 50534-50.

Regarding EPA Reg. No. 50534-50, in addition to the aforementioned comments, under **Hazards to Humans and Domestic Animals**, revise "In case of contact..." to "If In Eyes...", and preface "Wash exposed skin..." with "If On Skin". Under **Mixing Instructions**, in the first sentence, delete the "s" from "Herbicides".

2181  
Under **Cotton**, and **Non-Crop**, the directions for use must be revised to reflect those application rates on your label stamped "ACCEPTED DEC 14 1983". Under **Cotton** revise to read, "Mix 3 quarts of Monex 3 Herbicide in 90 gallons of water..." Under **Non-Crop**, revise to read, "Mix 2-4 quarts of Monex 3 Herbicide in 100 gallons of water."

Regarding EPA Reg. No. 50534-54, in addition to the aforementioned comments, under **Storage and Disposal**, revise the second sentence of the container disposal instructions to read, "Triple rinse...sanitary landfill, or by incineration, or by other procedures, such as burning, if approved by state and local authorities. If burned, stay out of smoke."

Regarding EPA Reg. No. 50534-106, reinstate "Do not spray or allow drift onto vegetables, ornamentals or other desirable plants" under the **Non-Crop** section of your label.

Sincerely Yours,

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

Enclosures

Jacket

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See 4-10

**KACODIL®**  
**Herbicide**

**(Sodium Cacodylate Liquid Plus Surfactant)**

|                    |         |
|--------------------|---------|
| Active Ingredient: |         |
| Sodium Cacodylate  | 27.26%  |
| Inert Ingredients: | 72.74%  |
| Total              | 100.00% |

Total Arsenic (as elemental) all in water soluble form 13.09%

Product contains 2.48 lbs. cacodylic acid equivalent per gallon.

**Keep Out of Reach of Children**  
**CAUTION:**

See side panel for additional precautionary statements.

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

EPA Reg. No. 50534-106  
EPA Est. No.

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KACODIL® is a registered trademark of ISK Biotech Biosciences Corporation

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
11 22  
the Federal Insecticide  
and Rodenticide Act  
and for the pesticide  
under EPA Reg. No.  
50534-106

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**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 the material has been washed into the soil.~~

**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 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.

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**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 apply when weather conditions favor drift from target area. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not spray or allow drift onto vegetables, ornamentals or other desirable plants.

**Kacodil**

Read entire label before using product.

**General Information**

Kacodil is a non-selective contact herbicide useful for control of many annual grasses and broadleaf weeds and for top kill and suppression of perennial weeds. Best results are obtained when application is made to young actively growing plants. Repeat applications are required for season-long control of perennial weeds. As Kacodil is inactivated on contact with the soil, herbicide residues do not accumulate.

Note: Local conditions, crop varieties and application regulations vary and may affect use of this herbicide. Consult local agricultural experiment station or extension service weed specialists and state regulatory agencies for recommendations in your area.

Note: When stored at temperatures below freezing, it may be necessary to warm contents to 45°F and mix thoroughly before using.

**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.**

**Preparation of the Spray:** Kacodil Herbicide is completely water soluble. Any spray equipment that gives good coverage may be used. Fill the tank about half full with water and add the required amount of herbicide with agitation. Finish filling the tank with water and apply. After use, clean equipment thoroughly by flushing with water *in a safe place*.

Do not store spray solution in tank for a prolonged period overnight.

**Agricultural Plantings -- Citrus (Except Florida):** Kacodil Herbicide is useful as a directed application in non-bearing citrus orchards such as orange, grapefruit, tangerine, lemon and lime orchards. It should be applied at the rate of 1-1/2 to 2 gallons per acre. Mix 1 to 2 gallons of Kacodil Herbicide in 50 to 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 leaves, stems or bark. Use a shield, if necessary, to protect nursery plantings or young trees from spray drift. Do not apply around trees from which fruit will be harvested within one year of treatment.

**Lawn Renovation:** Mow lawn to about 1 inch high before treatment. Apply 10 fluid ounces of Kacodil Herbicide in 4 gallons of water per 1,000 sq. ft., spraying foliage thoroughly. Best control is obtained when application is made on a warm sunny day. Foliage will usually turn brown in about five days. Bermudagrass and other deep-rooted perennials, or partially sprayed foliage, may require a second treatment. Reapply five days later if green areas remain.

When foliage has browned, matted areas should be raked to remove dead vegetation. The lawn may then be re-established according to local practice.

**Non-Crop:** Kacodil Herbicide is useful for general weed control on drainage ditchbanks and rights-of-way, along sidewalks, driveways and fences, around buildings and ornamentals, and on similar non-crop areas. Mix 1 to 2 gallons Kacodil Herbicide in 100 gallons of water. Spray unwanted vegetation to just short of run-off. If regrowth occurs, reapply as required. Do not allow spray to come in contact with foliage, green bark, grafted unions, or scuffed, damaged or broken bark when spraying around trees and ornamentals. Do not feed treated foliage to livestock or graze treated areas.

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**Storage and Disposal**

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

**Pesticide Disposal:** Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to Federal, State or local procedures under the Resource Conservation and Recovery Act.

**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 approved by State and local procedures.

**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 conducive to good agricultural and/or horticultural practices.*