

MAY 25 1993

Nik Ramswick
Universal Cooperatives, Inc.
7801 Metro Parkway
P.O. Box 460
Minneapolis, MN 55440

Dear Ms. Ramswick:

Subject: Revised Labeling
Red Panther MSMA Liquid
EPA Registration No. 1386-643 ✓
Red Panther Super Juice
EPA Registration No. 1386-645
Your Submissions Dated March 13, 1993

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. Update the Environmental Hazards Statement to include the following:

For terrestrial uses, 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.

Refer to PR Notice 93-3.

b. Delete the statement, "Use of this product in a manner not in accordance with the information on this label may injure or kill humans, domestic animals, wildlife, aquatic life, desirable plants, create excessive and unlawful residues or produce other undesirable results." This language is unnecessarily broad and misleading, and detracts from the acceptable precautionary language.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

Note that this acceptance of your label does not relieve you of your obligation to comply with the Worker Protection Standard (WPS). If any of your products are covered by the WPS, you are required to submit, and receive the Agency's approval by April 21, 1994, of a revised label reflecting the required label statements of 40 CFR 156, published in the FEDERAL REGISTER on August 21, 1992 (57 FR 38102). Further guidance will be issued. According to 40 CFR 156, subpart K, specifically § 156.200(c)(3): "No product to which this subpart applies shall be distributed or sold without amended labeling by any registrant after April 21, 1994."

Please note you inadvertently dated your transmittal letters as May 13, 1993.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



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

Enclosure

3 7 4

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAY 25 1993

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

1386-643

FOR POST-EMERGENCE WEED CONTROL ON COTTON

FOR CONTROL OF weeds, and grasses, including Johnson grass, nut grass, water grass, goose grass, dallis grass, and cocklebur.
READ ENTIRE LABEL BEFORE USING THIS PRODUCT.

Monosodium Acid Methanesulfonate.....	91.0%
INERT INGREDIENTS.....	49.0%
	100.0%
Total Arsenic, all in water soluble form,	
expressed as elemental	23.81%
Product contains 6.6 lbs. MSMA per gallon.	

CAUTION

**KEEP OUT OF REACH OF CHILDREN
SEE SIDE PANEL FOR ADDITIONAL CAUTIONS
STATEMENT OF PRACTICAL TREATMENT:**

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.

EPA Reg. No. 1386-643

Net Contents 1 Gallon (3.785 liter)

EPA Est. No. 1386-OH-1

BEST AVAILABLE COPY

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. Wash hands after using. Avoid storage near feed or food products. Keep children and domestic animals off treated areas until this material has been washed into the soil.

PROTECTIVE CLOTHING STATEMENT

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

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.

STORAGE AND DISPOSAL

- 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; triple rinse (or equivalent) and 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.

MIXING DIRECTIONS

For proper mixing of RED PANTHER MSMA, fill the spray tank half full of water, then add the required amount of MSMA. Start the pump circulating the spray mixture and finish filling the tank with water. MSMA is completely soluble in water.

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 through any type of irrigation system.

Read entire label before using this product. Use of this product in a manner not in accordance with the information on this label may injure or kill humans, domestic animals, wildlife, aquatic life, desirable plants, create excessive and unlawful residues or produce other undesirable results.

COTTON: Directed Broadcast Applications:

Mix 3 pints RED PANTHER MSMA plus 2-4 pints RED PANTHER SURFACTANT in 60 gallons of water. Apply 40 gallons of this mixture per acre. Thorough coverage of weeds and grass is absolutely necessary for maximum control. Adjust nozzles to direct the spray in a manner to allow maximum coverage of weeds. Keep spray off cotton foliage. Apply only when cotton is 8 inches high to first bloom.

BAND TREATMENT:

Mix 3 pints RED PANTHER MSMA plus 2-4 pints RED PANTHER SURFACTANT in 60 gallons of water. Apply at the rate of 1 gallon of spray solution per each 1 in of band width to be treated on cotton grown in 40 inch rows. (Example: For a 12 inch band apply 12 gallons per acre.) A second application may be required during humid growing conditions. Time the second application if necessary, about 1 to 3 weeks after the first application. Adjust nozzles to direct the spray in a manner to allow maximum coverage of weeds. Keep spray off cotton foliage. Apply only when cotton is 3 inches high to first bloom. Weed control is most effective at temperatures about 70°F. Always use RED PANTHER SURFACTANT with RED PANTHER MSMA as it is not nearly as effective when used alone.

GENERAL GRASS AND WEED CONTROL:

RED PANTHER MSMA is useful for controlling Johnson grass, nut grass, water grass, and goose grass on rights-of-way, storage yards, and similar non-crop areas. Mix 3 pints RED PANTHER MSMA plus 2 to 4 pints RED PANTHER SURFACTANT in 60 gallons of water. Spray the unwanted vegetation thoroughly, to the point of runoff. Make certain that complete coverage is obtained. Power sprayers are preferred, but any spray equipment which will give good coverage may be used. If regrowth occurs in spots, retreat as required.

APPLICATION METHODS

RED PANTHER MSMA should be applied with a low volume sprayer, having satisfactory pumping and bypass action. Nozzles should be placed so as to avoid spraying the cotton, but also to give thorough coverage of the weeds and grasses. Adjust nozzles to direct the spray in a manner to allow maximum coverage of weeds. Keep spray off cotton foliage. **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.

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.