



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

MAR 23 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Nik Ramswick
UNIVERSAL COOPERATIVES INC.
P.O. BOX 460 7801 METRO PARKWAY
MINNEAPOLIS, MN 55440

Subject: Label Amendment Submission of 08/04/93 in Response to PR Notice 93-7
EPA Reg. No. 1386-643
RED PANTHER MSMA LIQUID

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

2 of 9

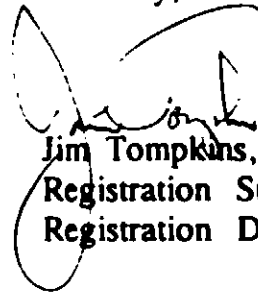
Submit the final printed labeling via the U.S. Postal Service to:

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,



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

Attachment

379

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Nik Ramswick
UNIVERSAL COOPERATIVES INC
P.O. BOX 460 7801 METRO PARKWAY
MINNEAPOLIS MN 55440

Comment for: EPA Reg Nr.1386-643
RED PANTHER MSMA LIQUID

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

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

The glove requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Waterproof gloves". The exact location is shown in Sections A and B on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The Agricultural Use Requirements section must be located in a clearly separate box on the product labeling -- with lines or other graphic indicators (such as contrasting color) to separate the section from the surrounding text.

Remove the statement "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." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

The glove requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Waterproof gloves". The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

The Non-Agricultural Use Requirements section must either be placed in a box or printed on the label in a contrasting

UNIVERSAL COOPERATIVES INC
EPA Reg. Number: 1386-643
RED PANTHER MSMA LIQUID
Application date: 08/04/93
Original Submission

color from the surrounding text.

5 of 9

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAR 23 1994
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1386-643

RED PANTHER MSMA LIQUID
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.

KEEP OUT OF REACH OF CHILDREN
CAUTION
See Side Panel For Additional Cautions

ACTIVE INGREDIENT:	
Monosodium Acid Methanearsonate	51.0%
INERT INGREDIENTS	49.0%
Total	100.0%

Product Contains 6.6 Lbs. MSMA Per Gallon.

Total Arsenic, all in water soluble form, expressed as elemental	23.61%
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Net Contents: 1 Gallon (3.785 liter)

EPA Reg. No. 1386-643
EPA Est. No. 1386-OH-1



6 of 9

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. Avoid storage near feed or food products.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- *Long-sleeved shirt and long pants
- *Chemical-resistant 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 prefilter 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.

Engineering controls statements: When handlers use 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:

- *Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

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.

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.

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.

7-89

DIRECTIONS FOR USE

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

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 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.

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
 - *Chemical-resistant 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 system.

Read entire label before using this product.

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.

COTTON: Directed Broadcast Application:

Mix 3 pints Red Panther MSMA plus 2 - 4 pints Red Panther Surfactant in 50 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 3 inches high to first bloom.

BAND TREATMENT

Mix 3 pints Red Panther MSMA plus 2 - 4 pints Red Panther Surfactant in 50 gallons of water. Apply at the rate of 1 gallon of spray solution per each 1 inch 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 50 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.

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.

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.