

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide - Section I**

1. Company/Product Number 5905-66	2. EPA Product Manager	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MSMA Plus	PM#	
5. Name and Address of Applicant (Include ZIP Code) Helena Chemical Company 225 Schilling Boulevard, Suite 300 Collierville, Tennessee 38017  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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**NOTIFICATION**  
  
 MAR 11 2005


**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Other Revisions  
 Notification of Other Revisions per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

<b>1. Material This Product Will Be Packaged In:</b>			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt    No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input checked="" type="checkbox"/> On Label
6. Manner in Which Label is Affixed to Product Self Adhesive		<input checked="" type="checkbox"/> Lithograph Paper glued Stenciled	<input type="checkbox"/> Other _____

**Section - IV**

<b>1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</b>		
Name Mandy K. Styles	Title Product Registration Supervisor	Telephone No. (Include Area Code) (901) 752-4420
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Product Registration Supervisor	
4. Typed Name Mandy K. Styles	5. Date 3/1/2005	

**\*MONOSODIUM ACID METHANEARSONATE PLUS SURFACTANT FOR POST-EMERGENT WEED CONTROL IN COTTON**

**ACTIVE INGREDIENTS:**

Monosodium Acid Methanearsonate ..... 35.43%

**INERT INGREDIENTS:** ..... 64.57%

**TOTAL** ..... 100.00%

Total Arsenic as elemental all in water soluble form ..... 16.36%

This product contains 4 lbs. MSMA per gallon.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**CAUTION**

Harmful if swallowed, avoid breathing spray mist. May cause irritation of nose, throat and skin. Avoid contact with eyes, skin and clothing. Do not contaminate feed and food stuffs.

**FIRST AID**

**IF SWALLOWED:** • Call a poison control center or doctor immediately for treatment advice.  
 • Do not induce vomiting unless told to do so by a poison control center or doctor.  
 • Have a person sip a glass of water if able to swallow.  
 • Do not give anything to an unconscious or convulsing person.

**IF IN EYES:** • Hold eyelid open and rinse slowly and gently with water for 15-20 minutes.  
 • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.  
 • Call a poison control center or doctor immediately for treatment advice.

**IF ON SKIN OR CLOTHING:** • Take off contaminated clothing.  
 • Rinse skin immediately with plenty of water 15-20 minutes.  
 • Call a poison control center or doctor immediately for treatment advice.

**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call ChemTrec at 1-800-424-9300.

**SEE INSIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS**

EPA REG. NO.: 5905-66

NET CONTENTS:

EPA EST. NO.:

**MANUFACTURED BY  
 HELENA CHEMICAL COMPANY  
 225 SCHILLING BOULEVARD, SUITE 300  
 COLLIERVILLE TENNESSEE 38017**

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistant category selection chart.

**Applicator and other handlers (other than mixers and loaders) must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such polyethylene or polyvinyl chloride
- Shoes plus socks

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), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

For exposures outdoors, a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C) or a NIOSH approved respirator with any N, R, P, or HE filter.

**Mixers and Loaders must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such polyethylene or polyvinyl chloride
- Shoes plus socks
- Protective eyewear
- Chemical-resistant apron when mixing and 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), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

For exposures outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C) or a NIOSH approved respirator with any N, R, P, or HE filter.

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**

**User 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.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to any body of water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

**CHEMIGATION PROHIBITION**

Do not apply this product through any type of irrigation system.

**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
- Chemical-resistant gloves
- Shoes plus socks.

**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 agriculture pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forest, nurseries, or greenhouses.

Keep children and pets out of treated area until sprays have dried.

**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**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:** Triple rinse (or equivalent). Then 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.

**APPLICATION METHODS**

**MSMA PLUS** 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 foliage, but also to give good coverage. Adjust nozzles to allow maximum coverage of weeds and grasses.

**MIXING INSTRUCTIONS**

**MSMA PLUS** Herbicide must be thoroughly dissolved. Fill the spray tank about half full with water, and with the pump operating, add the required amount of **MSMA PLUS** Herbicide. Finish filling the tank with water and apply.

If preferred, **MSMA PLUS** Herbicide can be pre-mixed by dissolving the required amount of **MSMA PLUS** in 3 to 5 gallons of water in an open head bucket. This pre-mix should then be placed in the partially filled spray tank, and the tank filled.

Do not store spray solution in tank for a prolonged period, and clean application equipment thoroughly after use by flushing with water.

**COTTON: MSMA PLUS** is useful as a directed post-emergence spray for controlling weeds in cotton such as Johnsongrass, Cocklebur, nutgrass, goosegrass, watergrass and dallisgrass.

Mix at rate of 4 pints (2 quarts) of **MSMA PLUS** in 40 gallons of water. Apply as a directed broadcast spray at a rate of 40 gallons of this solution per acre. Keep spray off cotton foliage. **MSMA PLUS** is a combination of a suitable non-ionic surfactant (wetting agent) and herbicide. IT IS NOT NECESSARY TO ADD ANY OTHER SURFACTANT TO THE SPRAY SOLUTION. For band applications, apply at a rate of one gallon of spray mixture for each one inch of band width to be treated on cotton grown on a 40 inch row basis. A second or repeat application, if needed, should be timed about 1 to 3 weeks after the first application.

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

Slight burning and reddish discoloration of cotton may occasionally be seen following recommended treatment, but cotton will develop normally. Yield will not be affected.

**NON-CROP USES: MSMA PLUS** has been found to be useful and effective in controlling johnsongrass, cocklebur, nutgrass, watergrass, goosegrass, dallisgrass and certain other weeds on drainage ditchbanks, fence rows, rights-of-way, storage yards, and similar non-crop areas. Do not contaminate waters used for domestic consumption or by animals, wildlife and aquatic life, or water used or irrigation purposes.

Mix at rate of 4 pints (2 quarts) of **MSMA PLUS** in 40 gallons of water. It is not necessary to include additional surfactant (wetting agent). Spray undesirable vegetation thoroughly to the point of runoff. Adequate coverage and complete wetting of foliage is very important. Repeat applications may be necessary if re-growth occurs.

**CONDITIONS OF SALE - LIMITED WARRANTY AND LIMITATIONS OF LIABILITY AND REMEDIES**

Read the Conditions of Sale - Warranty and Limitations of Liability and Remedies before using this product. If the terms are not acceptable, return the product, unopened, and the full purchase price will be refunded.

The directions on this label are believed to be reliable and should be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions or the failure to follow the label directions or good application practices, all of which are beyond the control of Helena Chemical Company (the "Company") or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. The Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of the Company. The Company makes no other warranties or representations of any kind, express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose, and no such warranty shall be implied by law.

The exclusive remedy against the Company for any cause of action relating to the handling or use of this product shall be limited to, at Helena Chemical Company's election, one of the following:

1. Refund of the purchase price paid by buyer or user for product bought, or
2. Replacement of the product used

To the extent allowed by law, the Company shall not be liable and any and all claims against the Company are waived for special, indirect, incidental, or consequential damages or expense of any nature, including, but not limited to, loss of profits or income. The Company and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability and remedies.

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**HELENA CHEMICAL COMPANY**

225 Schilling Blvd., Suite 300  
Collierville, Tennessee 38017  
Telephone: 901/761-0050

March 1, 2005

U.S. Environmental Protection Agency  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
1801 South Bell Street  
Crystal Mall #2, Room 266A  
Arlington, VA 22202-4501

RE: Notification to Add Other Revisions

To Whom It May Concern,

Enclosed, you will find Helena Chemical Company's Notification for numerous products. Helena has updated the copyright company name, all trademarks, and registered trademarks from Helena Chemical Company to Helena Holding Company. This has been done on the following products:

- Fyfanon 5lb. Emulsion 5905-7
- MSMA Plus 5905-66
- MSMA Arsonate Liquid 5905-67
- 2,4-D Amine 5905-72
- Atlas Brand Propanil 4 5905-77
- Helena Brand 2lb. Chlorate Defoliant Desiccant 5905-87
- 2,4-D LV Ester 4 5905-90
- Helena 2,4-D LV Ester 6 5905-93
- Helena Brand Fyfanon ULV Concentrate Insecticide 5905-112
- Helena 3lb. Chlorate Defoliant Desiccant 5905-118
- MSMA Plus HC 5905-164
- Helena Brand 10% Sevin Granules 5905-169
- Helena Brand 15% Sevin Granules 5905-180
- Helena Brand Propanil 4 5905-182
- Fyfanon The Premium Grade Malathion 5905-196
- Helena Brand Diuron 80WP Weed Killer 5905-245
- Diazinon AG500 5905-248
- Fyfanon 8lb. Emulsion 5905-250
- Helena Sevimol 4 Carbaryl Insecticide 5905-251
- Dusting Sulphur 5905-288

This should also be noted on all alternate brand names of the master labels.

In support of these Notifications, you will find the following:

- EPA Form 8570-1
- 1 copy of the revised label highlighted

If you have any questions, do not hesitate to call me at (901) 752-4420 or by fax at (901) 758-1694. Thank you for your assistance in this matter.

Sincerely,

Mandy K. Styles  
Product Registration Supervisor