



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

MAR 10 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Judy Oldham  
HELENA CHEMICAL COMPANY  
6075 POPLAR AVE, SUITE 500  
MEMPHIS, TN 38119

Subject: Label Amendment Submission of 08/16/93 in Response to PR Notice 93-7  
EPA Reg. No. 5905-67  
HELENA BRAND MSMA ARSONATE 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 SoyCansola Ink on paper that  
contains at least 50% recycled fiber

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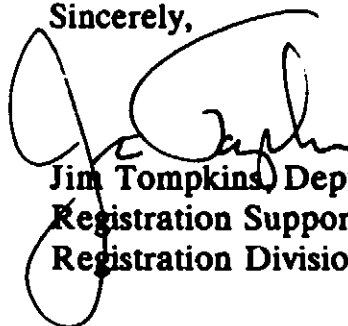
Submit the final printed labeling via the U.S. Postal Service to:

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,

A handwritten signature in black ink, appearing to read "Jim Tompkins", is written over the typed name and title.

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

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Judy Oldham  
HELENA CHEMICAL CO  
6075 POPLAR AVE SUITE 500  
MEMPHIS TN 38119

Comment for: EPA Reg Nr.5905-67  
HELENA BRAND MSMA ARSONATE LIQUID

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

The footwear 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 "Chemical-resistant footwear plus socks." 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 footwear requirement for "mixers and loaders" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Chemical-resistant footwear plus socks" under "Mixers and Loaders must wear:". The exact location is shown in Sections A and C on Part 1 of the Product Worksheet in Supplement Three A to PR Notice 93-7.

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 footwear 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 "Chemical-resistant footwear plus socks." 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.

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# MSMA ARSONATE LIQUID

FOR POST-EMERGENCE WEED CONTROL IN COTTON

**ACTIVE INGREDIENTS:**

Monosodium Acid Methanearsonate ..... 51.0%

**INERT INGREDIENTS:** ..... 49.0%

**TOTAL** ..... 100.0%

Total Arsenic, all in water soluble form, expressed as elemental ..... 23.41%

This product contains 6.6 lbs. MSMA per gallon

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

**SEE OTHER CAUTION STATEMENTS ON SIDE PANEL**

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

MAR 10 1994

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

5905-67

EPA REG. NO.: 5905-67

EPA EST. NO.:

NET CONTENTS:

**MANUFACTURED BY  
HELENA CHEMICAL COMPANY  
MEMPHIS, TN 38119**

**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.

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

**IF SPLASHED IN EYES:** Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention if irritation develops.

**IF SPILLED ON SKIN:** ~~Immediately remove contaminated clothing, INCLUDING SHOES, and~~ wash skin with soap and plenty of water. If irritation develops, send for a physician.

**PERSONAL PROTECTIVE EQUIPMENT**

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

Long-sleeved shirt and long pants

Waterproof gloves

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).

For exposures outdoor, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

**Mixers and loaders must wear:**

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

Protective eyewear

Chemical-resistant headgear

Chemical-resistant apron when 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 outdoor, 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.

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**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.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to any body of water. Do not contaminate water by cleaning of equipment or disposal of waste.

**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  
Waterproof 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 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 pets out of treated areas until sprays have dried.

**CHEMIGATION PROHIBITION**

Do not use this product in any type irrigation system.

**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** should be applied with a low volume sprayer having satisfactory pumping and bypass action. Nozzles should be placed so as to avoid spraying cotton foliage, but also to give good coverage of the weeds and grasses. Proper coverage is very important. Adjust nozzles to allow maximum coverage of weeds and grasses.

**ADJUST NOZZLES TO DIRECT THE SPRAY IN A MANNER TO ALLOW MAXIMUM COVERAGE OF WEEDS, KEEP SPRAY OFF COTTON FOLIAGE.**

#### **MIXING INSTRUCTIONS**

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

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

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

Helena Chemical Company makes no expressed or implied warranties. User relies on his own skill and judgement, and assumes all risk in use and handling.

**COTTON:** **MSMA** is useful as a directed spray application to weeds in cotton for post-emergence control of weeds and grasses, including Johnsongrass, nutgrass, watergrass, goosegrass, dallisgrass and cocklebur.

Mix at a rate of 3 pints **MSMA** plus 1 1/2 to 2 quarts of a suitable non-ionic surfactant cleared for application to growing crops, in 50 gallons of water. Apply at a broadcast rate of 40 gallons of this solution per acre. For band application, apply at a rate of one gallon of this solution for each 1 inch of band width to be treated on cotton grown in 40 inch rows. 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.

**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 a reddish discoloration on the cotton leaf may occasionally occur following the recommended treatment, but the cotton plant will develop normally.

**NON-CROP:** MSMA is useful for controlling Johnsongrass, nutgrass, watergrass, goosegrass, and similar weeds on drainage ditchbanks, 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 MSMA at a rate of 3 pints, plus 1 1/2 to 2 quarts of a suitable non-ionic surfactant in 50 gallons of water. Spray the unwanted vegetation thoroughly to the point of runoff. Any spray equipment that gives good coverage may be used. If re-growth occurs, re-treat as required.

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

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, 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 is a claim for damage and in no event shall damages or any other recovery of any kind against the Company exceed the price of the product which causes the alleged loss, damage, injury, or other claim. 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.