



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

JAN 14 1994

Judy Oldham
HELENA CHEMICAL COMPANY
6075 Poplar Avenue
Suite 500
Memphis, TN. 38119

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 08/13/93 In Response to PR Notice 93-7
EPA Reg. No. 5905-164
HELENA BRAND MSMA PLUS H.C.

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/Carbolic 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,

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

Attachment

MSMA PLUS H.C.

FOR SELECTIVE POST-EMERGENT WEED CONTROL HIGH CONCENTRATE

ACTIVE INGREDIENTS:

Monosodium Acid Methanearsonate* 47.6%

INERT INGREDIENTS: 52.4%

TOTAL 100.0%

Total Arsenic (as elemental) all in water soluble form 22.03%

*Product contains 6.00 lbs. MSMA per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE INSIDE PANELS FOR ADDITIONAL CAUTION STATEMENTS

ACCEPTED
with COMMENTS
in EPA Letter Dated
JAN 1 1994

EPA REG. NO.: 5905-164
EPA EST. NO.:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
5905-164

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 outdoors, 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-23 C), 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).

Flagmen should be fully protected during spray operations or mechanical flagmen used.

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 by cleaning of equipment or disposal of waste.

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.

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 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.

GENERAL INFORMATION

MSMA PLUS H.C. Herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. Its phytotoxic properties are quickly inactivated on contact with soil. It is a combination of herbicide and surfactant. It is unnecessary to add any other surfactant to the spray solution. Best results are obtained on young, actively growing weeds at air temperatures above 70 degrees F.

Do not feed treated foliage to livestock or graze treated areas. Do not contaminate waters used for domestic consumption, or by animals, wildlife and aquatic life, or for irrigation purposes.

MIXING INSTRUCTIONS: **MSMA PLUS H.C. Herbicide** must be thoroughly dissolved. Fill the spray equipment reservoir about half full with water and add the required amount of herbicide with agitation. Finish filling the reservoir with water and apply. After use, clean equipment thoroughly by flushing with water. Do not store spray solution in tank for a prolonged period.

USE DIRECTIONS

COTTON: **MSMA PLUS H.C. Herbicide** is useful as a directed application in cotton for post-emergent control of weeds and grasses, such as Johnsongrass, nutsedge, Dallisgrass, cocklebur, barnyardgrass, ragweed, sandbur and puncture vine. It should be applied at the rate of 1/3 gallon per acre.

Mix 3 quarts of **MSMA PLUS H.C. Herbicide** in 90 gallons of water. Do not add any surfactant to the spray solution. Apply spray solution at 40 gallons per acre. Weed control is most effective at temperatures above 70 degrees F. For band application in 40 inch rows, apply 1 gallon of spray solution per inch of band width per acre. Direct the spray solution to the base of the cotton plant. Nozzles should be placed so as to avoid spraying the cotton foliage. A second application may be required during humid growing conditions to control perennials, such as Johnsongrass and nutsedge. Apply the second application 1 to 3 weeks later.

Slight burning and a reddish discoloration of the cotton leaf may occasionally occur following the recommended treatment, but the cotton plant will develop normally.

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.

NON-CROP MSMA PLUS H.C. Herbicide is useful for control of Johnsongrass, nutsedge, Dallisgrass, cocklebur, barnyardgrass, ragweed, sandbur, puncture vine and certain other weeds on drainage ditchbanks, rights-of-way, fence rows, storage yards and similar non-crop areas.

Mix **MSMA PLUS H.C. Herbicide** at a rate of 6 to 12 pints in 100 gallons of water. Spray unwanted vegetation at a rate of about 50 gallons of spray solution per acre. Use spray equipment that gives good low volume coverage. If regrowth occurs, re-apply as required.

LAWN AND ORNAMENTAL TURF: MSMA PLUS H.C. Herbicide is useful for control of Dallisgrass, sandbur, bahiagrass, nutsedge, barnyardgrass, chickweed and wood sorrel with little or no injury to good lawn grasses. On new lawns, do not treat until after three mowings. Good grasses may be temporarily discolored. Zoysia bluegrasses and Bermuda are quite tolerant. Do not use on St. Augustine or centipede.

Mow lawns 1 to 1 1/2 inches high before treatment. Mix 1 1/3 fluid ounces (4 teaspoons) of **MSMA PLUS H.C. Herbicide** in 2 1/2 gallons of water and apply to an area of 1,000 sq. ft. Spray thoroughly to wet all undesirable plants. Repeat applications, 10 to 14 days apart, may be needed for good control.

Do not apply with hose-end applicators.

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.