



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

MAR 1 4 1994

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Barbara Brown
DREXEL CHEMICAL CO.
BOX 9306
MEMPHIS, TN 38109

Subject:

Label Amendment Submission of 07/09/93 in Response to PR Notice 93-7

EPA Reg. No. 197i3-41 DREXEL MSMA 6.6

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.

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

Barbara Brown Drexel Chemical Company Box 9306 Memphis TN 38109

Comments for: EPA Reg. No. 19713-41 Drexel MSMA 6.6

Protective Eyeware is not required for early entry.

Delete the crossed-out statements and additions indicated on your proposed label.

You must apply for a deviation if you permanently want to omit the OV respirator for enclosed spaces. Otherwise you must put the OV respirator for enclosed spaces on your label at the next printing.

You must notify OCM if you shipped any product with the attached old label with the serious errors.

Serious

DREXEL.

MSMA 6.6

MSMA LIQUID For Selective Post-Emergent Weed Control

ACTIVE INGREDIENTS:
Monosodium Acid Methanearsonate*51.0%
INERT INGREDIENTS:49.0%
Total Arsenic (as elemental)
all in water soluble form
*Product contains 6.6 lbs. MSMA per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION

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 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.

IF INHALED: Remove victim to fresh air

Revisions 6/93

EPA Reg. No. 19713-41 EPA Est. No. 19713-MS-1

NET CONTENTS GALLONS

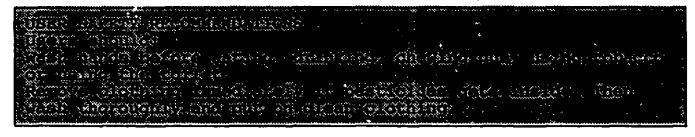
LITERS

DREXEL CHEMICAL COMPANY P O Box 9306 Memphis, Tn 38109



ACCEPTED with COMMENTS MAR 14 1994

Under the Federal Inoceticide, Fundicide, and Rodenticide Act an amended, for the penticide registered under EPA Reg. No.



ENVIRONMENTAL HAZARDS

For terrestrial uses, do not apply directly to any body of water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water used for irrigation or domestic purposes. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply when weather conditions favor drift from areas treated.



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.



TOTAL THE STATE OF THE STATE OF



GENERAL INFORMATION:

MSMA 6.6 Herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. Its activity is enhanced by addition of a suitable surfactant to the spray solution. It is most effective on young, actively growing weeds at air temperatures above 70°F. Its phytotoxic properties are quickly inactivated on contact with soil.

MIXING INSTRUCTIONS: MSMA 6.6 Herbicide must be thoroughly dissolved. Fill the spray equipment reservoir about half full with water and add the required amount of herbicide and surfactant 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.

COTTON: MSMA 6.6 Herbicide is useful as a directed application in cotton for the 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 2-1/2 pints per acre.

Add 6 pints of MSMA 6.6 Herbicide and 1 to 2 quarts of a suitable surfactant to 100 gallons of water and mix thoroughly. Apply spray solution at 40 gallons per acre. Weed control is most effective at temperatures above 70° 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 6.6 Herbicide is useful for controlling johnsongrass, nutsedge, barnyardgrass, and other weeds on drainage ditch banks, right of way, storage yards, and similar non-crop areas.

Mix MSMA 6.6 Herbicide at a rate of 3 to 6 pings, plus 1 to 2 quarts of a suitable surfactant in 100 gallons of water. Spray the unwanted vegetation thoroughly to just short of run-off. Any spray equipment that gives good coverage may be used. If regrowth occurs, reapply as required.

DO NOT CONTAMINATE WATERS USED FOR DOMESTIC CONSUMPTION OR BY ANIMALS, WILDLIFE AND AQUATIC LIFE, OR FOR IRRIGATION PURPOSES.

LAWN AND ORNAMENTAL TURF: MSMA 6.6 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, bluegrass, 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 fluid ounce (2 tablespoons) of MSMA 6.6 Herbicide and 1/2 fluid ounce (1 tablespoon) of a suitable surfactant in 5 gallons of water and apply to an area of 1,000 square feet. 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.

STORAGE AND DISPOSAL

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

Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool dry area away from any heat or ignition source. High heat may form volatile arsenic compounds. Do not stack over 2 pallets high. Move containers by handles or in cases. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed, seed, fungicides, insecticides and fertilizer to avoid contamination. Store in original containers only. If the contents are leaking or material is spilled follow these steps while wearing protective clothing:

- 1. Contain spill, absorb with an inert material such as sand or saw dust.
- 2. Collect and place in suitable containers for disposal.
- 3. Wash area with water and soap to remove remaining pesticide.
- 4. Follow washing with clean water rinse.
- 5. Place a leaking container in a plastic tub and transfer contents as soon as possible to an empty original container.
- 6. Do not allow run-off to enter sewer or contaminate water supplies.
- 7. Dispose of warte as indicated below.

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.

WARRANTY - CONDITION OF SALE:

DIRECTIONS FOR USE of this product are based on field use and tests believed reliable and should be followed carefully. It is however impossible to eliminate all risks associated with use of this product. Because such factors as weather conditions, foreign material and manner of use for application are all beyond the control of the Seller of this product, such things as crop injury, ineffectiveness or other unintended consequences may result.

All SUCH RISKS ARE ASSUMED BY THE BUYER
Seller warrants that this product conforms to the chemical
description on the label and is reasonably fit for the purposes
referred to in the directions for use. Seller makes no other
warranties, express or implied, including FITNESS OR
MERCHANTABILITY. In no case shall the Seller be liable for
consequential, special or indirect damages resulting from the use
or handling of this product. The foregoing is a condition of sale
by the Seller and is accepted as such by the Buyer.