

19713-41

5-14-2002

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 14 2002

Mr. Luz G. Piwonka
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

Dear Mr. Piwonka:

Subject: Label Amendment
DREXEL MSMA 6.6
EPA Reg. No. 19713-41
Your submission dated April 12, 2002

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Under the heading Precautionary Statements, remove the following text.

Avoid breathing of dust.
2. Under the heading Precautionary Statements, "For exposure outdoors" revise to read as follows:

A NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter.
3. Under the heading Mixing Instructions, remove the following text.

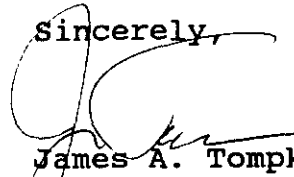
This product must be thoroughly dissolved.

Submit one (1) copy of your final printed labeling before you release the product for shipment. The enclosed stamped label supersedes all previous labels.

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A stamped copy of the labeling is enclosed for your records.

Sincerely,



James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

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ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAY 14 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
19713-71



MSMA 6.6

MSMA Liquid

For selective post-emergent weed control.

ACTIVE INGREDIENT:

Monosodium acid methanearsonate* ... 51.0%

OTHER INGREDIENTS: 49.0%

TOTAL: 100.0%

Total Arsenic (as elemental) all in water-soluble form is 23.61%.

*This product contains 6.6 pounds MSMA per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

SHAKE WELL BEFORE USING

EPA Reg. No. 19713-41

EPA Est. No. 19713-MS-1^A

EPA Est. No. 19713-AL-1^B

Net Contents: _____

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.
- Do not give anything to an unconscious or convulsing person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: HARMFUL IF SWALLOWED. May cause irritation of eyes, nose, throat and skin. Avoid contact with eyes, skin and clothing. Avoid breathing spray mist. Do not contaminate feed and foodstuffs. ~~Avoid breathing of dust.~~ Do not take internally.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some 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-resistance category selection chart

Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical resistant gloves such as polyethylene or polyvinyl chloride, protective eyewear, chemical-resistant footwear plus socks and chemical-resistant apron when cleaning equipment, mixing or loading.

(Continued)

PRECAUTIONARY STATEMENTS (Continued)

For exposure in enclosed areas, ~~a respirator with an organic vapor removing cartridge with a pre-filter approved for pesticides~~ (MSHA/NIOSH approved 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 R, P or HE prefilter.

For exposure outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any 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 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

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to 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.** 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 (WPS), 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, 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 (REI). The requirements in this box only apply to uses of this product that are covered by the WPS.

Do not enter or allow worker entry into treated areas during the REI of 12 hours.

PPE required for early entry to treated areas that is permitted under the WPS and that involves contact with anything that has been treated, such as plants, soil or water is: Coveralls, chemical resistant gloves such as polyethylene or polyvinyl chloride, and chemical-resistant footwear plus socks.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

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NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are not within the scope of the WPS 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.

GENERAL INFORMATION

MSMA 6.6 Herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. Its activity is enhanced by the 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: This product 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: This product is useful as a directed application in Cotton for the post-emergent control of weeds and grasses such as Barnyardgrass, Cocklebur, Dallisgrass, Johnsongrass, Nutsedge, Puncturevine, Ragweed and Sandbur. It should be applied at the rate of 2.5 pints per acre.

Add 6 pints of this product 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: This product is useful for controlling Barnyardgrass, Johnsongrass, Nutsedge and other weeds on drainage ditch banks, right-of-ways, storage yards and similar non-crop areas.

Mix this product at a rate of 3 to 6 pints, plus 1 to 2 quarts of a suitable surfactant in 100 gallons of water. Spray the unwanted vegetation thoroughly to just short of runoff. 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: This product is useful for control of Bahiagrass, Barnyardgrass, Chickweed, Dallisgrass, Nutsedge, Sandbur and Woodsorrel 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. Bermuda, Bluegrass and Zoysia are quite tolerant. Do not use on Centipede or St. Augustine.

Mow lawns 1 to 1.5 inches high before treatment. Mix 1 fluid ounce (2 tablespoons) of this product and 0.5 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 and disposal.

PESTICIDE STORAGE: 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 sawdust.
2. Collect and place in suitable containers for disposal.
3. Wash area with soap and water 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 runoff to enter sewer or contaminate water supplies.
7. Dispose of waste 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—CONDITIONS OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the Seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

In no case shall the Manufacturer or Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.