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11/13/96

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

*hand delivered
to Barbara Brown
11/13/96
with stamp
label.*

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 13 1996

Barbara Brown
Registration Specialist
Drexel Chemical Company
1700 Channel Avenue
P.O. Box 13327
Memphis, TN 38113-0327

SUBJECT: Label Amendment to Add Worker Protection Language
Drexel MSMA 6 Plus
EPA Reg. No. 19713-42
Your Submission Dated September 12, 1996

Dear Ms. Brown:

On September 12, 1996, you submitted an amendment request to add Worker Protection language. The labeling submitted is acceptable provided that you:

1. You have incorrect wording in the second-to-last sentence in the first paragraph in the Agricultural Use Requirements box on your proposed label. The sentence must be as follows: "It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval."

2. The percentages for the Active ingredients and the inert ingredients should read as follows:

ACTIVE INGREDIENTS:	
Monosodium Acid Methanearsonate*	47.6%
INERT INGREDIENTS:	52.4%
TOTAL:	100.0%

3. Make the print larger for the statement that reads "Product contains 6 lbs. MSMA per gallon. Total Arsenic (as elemental) all in water soluble form.....22%.

4. Add the statement "See Side Panel for Additional Precautionary Statements" after the signal word CAUTION.

5. Modify the Statement of Practical Treatment as follows:

IF ON SKIN: Immediately wash skin with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. Get medical attention.

6. The Environmental Hazards Statement should read:

For terrestrial uses 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 by cleaning of equipment or disposal of equipment washwaters.

7. Delete the word CAUTION from the Hazards to Human and Domestic Animals section.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

Sincerely yours,



Philip V. Errico
Acting Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosure

DREXEL
MSMA 6 Plus

MSMA Liquid Plus Surfactant

For Selective Post-Emergent Weed Control

ACTIVE INGREDIENTS:

Monosodium Acid Methanearsonate*47.6%

INERT INGREDIENTS:.....52.4%

TOTAL:.....100.0%

*Product contains 6 lbs. MSMA per gallon. Total Arsenic (as elemental) all in water soluble form.....22.03%

KEEP OUT OF REACH OF CHILDREN
CAUTION

<p>STATEMENT OF PRACTICAL TREATMENT</p> <p>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.</p> <p>IF IN EYES: Immediately flush eyes with plenty of water and get medical attention.</p> <p>IF ON SKIN: Immediately wash skin with plenty of soap and water while removing contaminated clothing and shoes. If irritation develops, seek medical attention.</p> <p>IF INHALED: Remove victim to fresh air.</p>
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EPA Reg. No. 19713-42
EPA Est. No. 19713-MS-1

Manufactured By:
Drexel Chemical Company
P.O. Box 13327, Memphis, TN 38113-0327

WPS submission 6/24/93
Revisions 02/94 - correction of WPS
09/10/96 - resubmission of WPS labeling. Never received accepted copy from Agency

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

NOV 13 1996

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

19713-42

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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, Waterproof gloves, Chemical-resistant footwear plus socks, protective eyewear and a chemical-resistant apron when cleaning equipment, mixing or loading.

For exposure in enclosed areas: A respirator with either an organic vapor-removing cartridge with a pre-filter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

For exposure outdoors: Dust/mist filtering respirator (MSHA/NIOSH) approval number prefix TC-21C). 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 handlers PPE requirements may be reduced or modified as specified in the WPS.

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.

USER SAFETY RECOMMENDATIONS

Users should:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing immediately if pesticides gets inside. Then wash thoroughly and put on clean clothing.

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.
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), notification to workers, 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. Personal Protective Equipment 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, soils or water is: Coveralls, Waterproof gloves and Chemical-resistant footwear 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 Worker Protection Standard 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 PLUS 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 surfactant to the spray solution. Best results are obtained on young, actively growing weeds at air temperatures above 70°F.

MIXING INSTRUCTIONS: MSMA 6 PLUS is completely water soluble. Fill the spray equipment reservoir about half full with water and add the required amount of herbicide with agitation. Finish filling the tank with water and apply. After use, clean equipment thoroughly by flushing with water. Do not store spray solution in tank for a prolonged period. Although MSMA 6 PLUS is only moderately corrosive, do not use in galvanized or aluminum equipment.

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

COTTON: MSMA 6 PLUS is useful as a preplant and/or directed application in cotton for the post-emergent control of weeds and grasses, such as johnsongrass, nutsedge, dallisgrass, cocklebur, barnyardgrass, ragweed, sandbur and puncturevine. It should be applied at the rate of 13 gallon per acre.

Mix 3 quarts of MSMA 6 PLUS in 90 gallons of water. Do not add any surfactant to the spray solution. Apply spray solution at 40 gallons per treated 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 of cotton.

PRE-PLANT APPLICATION: If planting of cotton has been delayed and weeds have emerged, use one preplant application. Cotton may be planted immediately following the preplant application.

POST-EMERGENT APPLICATION: In cotton previously treated with one application of DSMA, a directed application of MSMA 6 PLUS may be applied, if needed.
In cotton not treated with DSMA, two post-emergent directed applications of MSMA 6 PLUS may be applied.

DIRECTED APPLICATIONS: Direct the spray solution to the base of the cotton plant. Nozzles should be placed so as to avoid spraying the cotton foliage, but to give good coverage of the weeds and grasses. If regrowth occurs, make a second application about 1 to 3 weeks after the first. Slight burning and a reddish discoloration of the cotton leaf may occasionally occur following the directed application, but the cotton plant will develop normally.
Make directed applications only when cotton is 3 inches high to first bloom. Do not apply after first bloom.

CITRUS-BEARING AND NON-BEARING (Except Florida): MSMA 6 PLUS is useful as a directed application in citrus orchards, such as orange, grapefruit, tangerine, lemon and lime orchards. It should be applied at the rate of 1/3 to 2/3 gallons per acre.
Mix MSMA 6 PLUS at the rate of 1/3 gallon in 50 gallons of water. Apply as a directed spray in interspaces and around base of trees. Spray unwanted vegetation to just short of runoff. If regrowth occurs, reapply as required; however, do not exceed 3 applications per year.
Do not allow spray solution to contact fruit, leaves, stems or bark. Use a shield, if necessary, for nursery planting or young trees.

AGRICULTURAL PLANTINGS: MSMA 6 PLUS is useful as a directed application in non-bearing vineyards and in non-bearing deciduous fruit and nut orchards, such as apple, peach, pear, plum, prune, apricot, cherry, almond and walnut orchards. It should be applied at the rate of 1/3 to 2/3 gallons per acre.

Mix MSMA 6 PLUS at the rate of 1/3 gallon in 50 gallons of water. Apply as a directed spray in interspaces and around base of trees or vines. Spray unwanted vegetation to just short of run-off. If regrowth occurs, reapply as required; however, do not exceed 3 applications per year. Do not allow spray solution to contact leaves, stems or bark. Use a shield, if necessary, for nursery plantings or young trees. Do not apply around trees or vines from which fruit will be harvested within one year of treatment.

NON-CROP: MSMA 6 PLUS is useful for controlling johnsongrass, nutsedge, dallisgrass, cocklebur, ragweed, sandbur, puncturevine and certain other weeds on drainage ditch banks, rights-of-way, storage yards, and similar non-crop areas. Mix MSMA 6 PLUS at a rate of 6 to 12 pints in 100 gallons of water. Spray the 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, reapply as required.

LAWN AND ORNAMENTAL TURF: MSMA 6 PLUS is useful for control of dallisgrass, sandbur, bahiagrass, nutsedge, crabgrass, chickweed and wood sorrel with little or no injury to tolerant lawn grasses. On new lawns, do not treat until after three mowing. Tolerant grasses may be temporarily discolored. Zoysia, bluegrass, and bermuda are quite tolerant. Do not use on St. Augustine or centipede.

To treat larger areas, such as athletic fields, golf courses and parks, mow lawns 1 to 1 1/2 inches high before treatment. Mix 1 1/3 fluid ounces (8 teaspoons) of MSMA 6 PLUS in 2 1/2 gallons of water and apply to an area of 1,000 square 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

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 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 - CONDITION 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 Drexel or the 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 Drexel Chemical Company and is accepted as such by the Buyer.