19713 - 42 3 Please read instructions on reverse before completing form.	3/12/2004	Page 1 7 6 OMB No. 2070-0080. Approved expires 2-28-95	
United States Environmental Protection Washington, DC 20460	Agency	OMB No. 2070-0080. Approved expires 2-28-95 Registration Amendment Other	
Application for Pesticide - Section I			
1. Company/Product Number 19713-42	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification None Restricted	
4. Company/Product (Name) DREXEL BUENO 6 +	PM# 25/Herbicide Branch		
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company, P.O. Box 13327 Memphis, TN 38113-0327	1	n accordance with FIFRA Section 3(c)(3) or or identical in composition and labeling	
Check if this is a new address	Product Name		
Section - II			
Amendment - Explain below. NOTIFICATION Resubmission in response to Agency letter detail AR 1 2 20 Notification - Explain below.	Final printed labels	on.	
One (1) copy of the label (42ASP-0204++) with the alternate brand name is submitted for your record and file. The required certification statement is also submitted. Thank you.			
	Section - III		
Yes Yes	Yes No. per sockage wgt container	2. Type of Container Metal Plastic Glass Paper Other (Specify)	
3. Location of Net Contents Information 4. Size(s) Retail C	ontainer 5. Loca	tion of Label Directions	
6. Manner in Which Label is Affixed to Product Lithograph Paper glued Stendied	Other		
	ection - IV		
1. Contact Point (Complete items directly below for identification of	individual to be contacted, if neces	sery, to process this application.)	
Name Title REG	GISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4373	
Certification I certify that the statements I have made on this form and all all acknowledge that any knowlingly false or misleading stateme both under applicable law.	ttachments thereto are true, accura		
2. Signature 3. Till REC	tte GISTRATION MANAGER	3 1 1 3 1 3 1 3 1 3 1 3 1 3 1 3 1 3 1 3	

5. Date

February 16, 2004

4. Typed Name

LUZ G CHAN



February 16, 2004

MAR 1 2 2004 NOTIFICATION

Submission of an Alternate Brand Name by Notification per PR Notice 98-10 DREXEL BUENO 6 + (EPA Reg. No. 19713-42)

This notification is consistent with the Provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

FOR DREXEL CHEMICAL COMPANY

Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327 Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: info@drexchem.com • www.DrexChem.com

February 16, 2004

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Ariel Rios Bldg
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460=0001

Re: Submission of an Alternate Brand Name by Notification per PR Notice 98-10 DREXEL BUENO® 6 + (EPA Reg. No. 19713-42)

In support of the above, herewith:

- 1. Completed EPA Form 8570-1
- 2. One (1) copy of the label (42ASP-0204++) matching Drexel MSMA 6 Plus final label (42SP-1203++) submitted to the Agency on December 19, 2003.
- 3. Certification statement

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370. My e-mail address is Lchan@drexchem.com.

Thank you.

Respectfully yours,

FOR DREXEL CHEMICAL COMPANY

Luz & Chan

Registration Manager



NOTIFICATION MAR 1 2 2004

MSMA Liquid Plus Surfactant

For selective post-emergent weed control in Citrus, Cotton, Non-bearing Fruit and Nut Trees (Almonds, Apples, Apricots, Cherry, Peaches, Pears, Plums and Walnuts), Lawn and Ornamental turf, and Noncrop areas. Controls Crabgrass and Dallisgrass.

ACTIVE INGREDIENT:

Monosodium acid methanears	onate 47.6%
OTHER INGREDIENTS:	<u>52.4%</u>
TOTAL:	100.0%

This product contains 6 pounds of MSMA per gallon. Total Arsenic (as elemental), all in water-soluble form, is 22.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below SHAKE WELL BEFORE USING

EPA Reg. No. 19713-42 **EPA Est. No.**

Net Contents:

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor
- Do not give anything by mouth to an unconscious or convulsing person.

IF IN EYES:

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- 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 eye.

IF ON SKIN OR CLOTHING:

- 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, preferaby mouth-to-mouth, if possible

Call a poison control center or doctor for 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. 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, and shoes plus socks.

Mixers and loaders must wear:

- · Long-sleeved shirt and long pants
- Chemical-resistant gloves
- Shoes plus socks
- Protective eyewear
- Chemical-resistant headgear
- Chemical-resistant apron when mixing or loading.

(Continued)

PRECAUTIONARY STATEMENTS (Cont.)

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 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: 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, 3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

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 when cleaning equipment or disposing of equipment washwaters or rinsate.

Note: Add this statement to all container sizes of 5 gallons and higher. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. **GENERAL INFORMATION**

Bueno 6+ is a herbicide useful for controlling weeds in Cotton, Citrus, non-bearing Vineyards, deciduous fruit and nut orchards, Non-crop areas and Lawn and Ornamental turf. 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.

Weeds controlled by this product include:

Bahiagrass (Paspalum sp.) Barnyardgrass (Echinochloa crus-galli) Jimsonweed (Datura stramonium) Beggartick, hairy (Biden pilosa) Brachiaria spp. Broomsedge

Chickweed (Stellaria media) Cocklebur (Xanthium spinosum) Crabgrass, large (Digitaria sp.) Crabgrass, smooth (Digitaria sp.) Dallisgrass (Paspalum dilatatum) Dandelion (Taraxacum officinale)
Dayflower (Commelina sp.) Fiddleneck (Amsinckia sp.) Florida Beggarweed

(Desmodium tortuosum) Foxtail (Setaria sp.) Goosegrass (Eleusine indica) Guineagrass (Panicum sp.) Johnsongrass (Sorghum halipense) Morningglory (Ipomoea spp.) Mustard, wild Nutsedge (Cyperus sp.) Oats, wild (Avena fatua) Pigweed (Amaranthus sp.) Puncturevine (Tribulus terrestris) Purslane, common Ragweed (Ambrosia spp.) Sandbur (Cenchrus sp.) Sicklepod (Cassia obtusifolia) Sorrel, Wood (Oxalis sp.) Spurge (Euphorbia sp.) Witchgrass (Panicum capillare)



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 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 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 pets out of the treated area until sprays have dried.

MIXING INSTRUCTIONS

This product 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 this product is only moderately corrosive, do not use in galvanized or aluminum equipment.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

- 1) The distance of the outer most nozzles on the boom must not exceed three-fourth the length of the wingspan or rotor.
- Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees

Where states have more stringent regulations, they shall be ob-

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Infor-

Information on Droplet Size

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

Controlling Droplet Size

- Volume Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger
- Pressure Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types, lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- Number of nozzles Use the minimum number of nozzles that provide uniform coverage.
- Nozzle Orientation Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- Nozzle Type Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift

Boom Lenath

For some use patterns, reducing the effective boom length to less than three-fourths of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height

Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

Wind

Drift potential is lowest between speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray

Temperature and Humidity

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas

This pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive area).

COTTON

This product is useful for the control of weeds listed under GENERAL INFORMATION section and many similar weeds.

Application can be made: 1) Preplant or postplant up to cracking of soil before Cotton emergence using ground or aircraft equipment. 2) Postemergent, over the top, when Cotton is 3 to 6 inches high or up to early first square stage, whichever occurs first using ground or aircraft equipment. 3) Postemergent as a directed spray with ground equipment when Cotton is 3 inches high to first bloom. Slight burning and a reddish discoloration of the Cotton leaf may

occasionally occur following application, but the Cotton plant will develop normally.

DO NOT allow spray or spray drift to contact adjacent crops or injury will result. Apply only on still days when weather conditions DO NOT favor drift from areas being treated. Aircraft applications of this product should only be made by applicators experienced in use of herbicides, and application should be made in accordance with State and Federal regulations.

Note: Applications to Cotton in Florida should be confined to band

Pre-Plant Application or Post-plant up to Cracking Application: If planting of Cotton has been delayed and weeds have emerged, a single ground or aircraft application of this product can be made to prepared Cotton seedbeds or as a postplant treatment, but no later than initial cracking of soil. Cotton may be planted immediately following the pre-plant application. Mix at the rate of 2.66 pints of this product in 40 gallons of water for ground equipment or in 5 to 10 gallons of water for aircraft application per acre of Cotton

Post-Emergent Applications Using Ground or Aircraft Equipment as an Over-the-Top Broadcast Spray when Cotton is 3 inches high until early first square stage as a salvage operation. Mix at the rate of 1 to 1.25 pints of this product in 40 gallons of water for ground equipment or in 5 to 10 gallons of water for aircraft application per acre of Cotton. If needed, a second or repeat application should be made 1 to 3 weeks after the first application. Apply only as a salvage operation. Apply only to healthy, rapidly growing

6 3-6

Cotton, 3 inches high, but no later than 6 inches high or early square, whichever occurs first. Preference should be given to directed sprays. In order to minimize injury, the second application should be made as a directed spray when possible. DO NOT make more than two applications total of either DSMA or MSMA (or a combination) per season. Do not feed foliage to livestock or graze treated areas. Postemergent Directed Spray Applications: Mix this product at the rate of 2.66 pints in 40 gallons of water per acre. For band applications, apply 1 gallon in 40 gallons of water per acre. For band applications, apply 1 gallon of above diluted spray per acre for each 1 inch band width to be treated of Cotton grown on 40 inch row spacing. 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. If regrowth occurs, make a second application about 1 to 3 weeks after the first. Make directed applications only when Cotton is 3 inches high to first bloom. Do not apply after first bloom. Do not feed foliage to livestock or graze treated areas.

CITRUS

Bearing and Non-Bearing: This product is useful as a directed application in Citrus orchards, such as Grapefruit, Lemon, Lime, Orange and Tangerine orchards. It should be applied at the rate of one-third to two-thirds gallon per acre. Mix this product at the rate of one-third 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 plantings or young trees. Use only as spot treatment in Florida.

NON-BEARING FRUIT AND NUT TREES

This product is useful as a directed application in the following specified non-bearing Vineyards and in non-bearing deciduous Fruit and Nut orchards: Almonds, Apples, Apricots, Cherrles, Peaches, Pears, Plums, Prunes and Walnut orchards. It should be applied at the rate of one-third to two-thirds gallon per acre. Mix this product at the rate of one-third 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 runoff. 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.

NOŃ-CROP

This product is useful for controlling weeds listed under GENERAL INFORMATION section and similar other weeds on drainage ditch banks, right-of-ways, storage yards and similar non-crop areas. Mix this product at a rate of 2.5 to 6 pints per 40 to 50 gallons of water per acre. Use higher rates and spray volume for dense weed growth. For small areas, use 1 to 2 fluid ounces in 5 gallons per 1,000 square feet. Spray undesirable vegetation thoroughly to point of runoff. Adequate coverage and complete wetting of foliage is important for effective control. If regrowth occurs, reapply as required.

LAWN AND ORNAMENTAL TURF

This product is useful for control of Bahiagrass, Barnyardgrass, Chickweed, Crabgrass, Dallisgrass, Nutsedge, Sandbur and Woodsorrel with little or no injury to tolerant lawn grasses. On new lawns, do not treat until after three mowings. Tolerant grasses may be temporarily discolored. Bermuda, Bluegrass and Zoysia are quite tolerant. Do not use on Carpetgrass, Centipede grass or on Dichondra. Do not apply to St. Augustine grass except for commercial sod production.

To treat larger areas, such as athletic fields, golf courses and parks, mow lawns 1 to 1.5 inches high before treatment. Mix 1.33 fluid ounces (8 teaspoons) of this product in 1 to 2.5 gallons of water and apply to an area of 1,000 square feet. For established Bermudagrass and Zoysiagrass, mix 1 to 2 fluid ounces (2 to 4 tablespoons) of this product in 1 to 2.5 gallons of water for application 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.

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 fertilizers to avoid contamination. Store in original containers only. If the contents are leaking or material is spilled, follow these steps while wearing protective clothing:

- 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.
- Place a leaking container in a plastic tub and transfer container, 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: Pesticide wastes are toxic. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency or the hazardous waste representative at the nearest EPA regional office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

CONTAINER DISPOSAL: (For Residential/Household Uses):

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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 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 the Seller and is accepted as such by the Buyer.