

19713-42

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY JUN - 1 2009
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Subject: Label Amendments for Compliance with Organic Arsenicals Agreement
MSMA products
EPA Reg. Nos.; Product Name:
19713-42; DREXEL MSMA 6 PLUS
19713-278; DREXEL MSMA LIQUID 6 PLUS
Applications Dated: March 3, 2009.

Dear Luz Chan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the following changes before you release the product for shipment.

- a. All pre-emergent applications to cotton must be removed from this label (e.g. 'Postplant up to cracking of soil before cotton emergence')
- b. Label must include the following pilot engineering controls text:
"Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(60)."
- c. Submit the following confirmatory data to support the use of MSMA on cotton no later than August 30, 2010:
 - a. Magnitude of the residue in meat and milk (Guideline 860.1480)
 - i. Registrants must develop confirmatory data that demonstrate no detectable residues of inorganic arsenic will be found in the edible tissues and milk of cows consuming cotton feed items treated with MSMA. Data may be developed in a tiered fashion.
 - b. Field rotational crop study (Guideline 860.1900)
 - i. Registrants must provide data demonstrating no residues of inorganic arsenic in food crops (peanuts) that are rotated with cotton. This requirement may be satisfied with data from the open literature or a new study conducted in accordance with Guideline 860.1900.

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Organic Arsenical Label Amendments
EPA Reg. Nos. 19713-42 and 19713-278

Submit one (1) copy of final printed labeling for each product incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,



Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

JUN - 1 2009

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

19713-42

Drexel

MSMA 6 Plus

MSMA Liquid Plus Surfactant

For selective post-emergent weed control in Cotton, Highway Rights-of-Way, Golf courses, and Sod farms.

ACTIVE INGREDIENT:

Monosodium acid methanearsonate*	47.6%
OTHER INGREDIENTS:	52.4%
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. 19713-XX-XXX

Net Content: _____

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:

- 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.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

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. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

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.

(Continued)

PRECAUTIONARY STATEMENTS (Cont.)

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are polyethylene or polyvinyl chloride. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicator and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves, and shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, 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/PPE 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

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.

USE INFORMATION

MSMA 6 PLUS is a herbicide useful for controlling weeds in Cotton, Highway Rights-of-Way, Golf courses, and Sod farms. 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 (<i>Paspalum sp.</i>) | Guineagrass (<i>Panicum Sp.</i>) |
| Barnyardgrass (<i>Echinochloa crus-galli</i>) | Jimsonweed (<i>Datura stramonium</i>) |
| Beggartick, hairy (<i>Biden pilosa</i>) | Johnsongrass (<i>Sorghum halipense</i>) |
| Brachiaria spp. | Morningglory (<i>Ipomoea spp.</i>) |
| Broomsedge | Miscanthus wild |
| Chickweed (<i>Stellaria media</i>) | Nutseed (Cyperus sp.) |
| Cocklebur (<i>Xanthium spinosum</i>) | Oats, wild (<i>Avena fatua</i>) |
| Crabgrass, large (<i>Digitaria sp.</i>) | Pigweed (<i>Amaranthus sp.</i>) |
| Crabgrass, smooth (<i>Digitaria sp.</i>) | Puncturevine (<i>Tribulus terrestris</i>) |
| Dallisgrass (<i>Paspalum dilatatum</i>) | Purslane, common |
| Dandelion (<i>Taraxacum officinale</i>) | Ragweed (<i>Ambrosia spp.</i>) |
| Dayflower (<i>Commelina sp.</i>) | Sandbur (<i>Cenchrus sp.</i>) |
| Fiddleneck (<i>Amsinckia sp.</i>) | Sicklepod (<i>Cassia obtusifolia</i>) |
| Florida Beggarweed | Sorrel, Wood (<i>Oxalis sp.</i>) |
| (<i>Desmodium tortuosum</i>) | Spurge (<i>Euphorbia sp.</i>) |
| Foxtail (<i>Setaria sp.</i>) | Witchgrass (<i>Panicum capillare</i>) |
| Goosegrass (<i>Eleusine indica</i>) | |

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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.

APPLICATION RESTRICTIONS

- Do not apply this product in Florida except on Cotton in the counties listed in the Cotton use section of this label.
- Aerial application is prohibited, except when applying to Cotton.

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.
- 2) 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 observed. The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

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 droplets.
- 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 Length

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.

Swath Adjustment

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 drift.

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 "USE INFORMATION" section and many similar weeds.

Applications can be made: 1) 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.

USE RESTRICTIONS

- Do not apply in Florida except on Cotton grown in the following counties: Calhoun, Columbia, Escambia, Gadsden, Hamilton, Holmes, Jackson, Jefferson, Okaloosa, Santa Rosa, Suwannee, Walton, and Washington.
- **Note:** Applications to Cotton in Florida should be confined to band treatments.
- Only one application at 2 lbs. a.i. (2.66 pts. of this product) per acre is allowed per season, except when a salvage operation is needed.
- If a salvage operation is needed (i.e., if pigweed escapes the first application), then a second or repeat application at 2 lbs. a.i. (2.66 pts. of this product) per acre is allowed.
- A second or repeat application, if needed, should be timed 1 to 3 weeks after the first application. Apply only as a salvage operation. Apply only to healthy rapidly growing Cotton 3 inches high, but no later than 6 inches high or early square, whichever occurs first. Preference should be given to directed spray. In order to minimize injury, the second application should be made as a directed spray when possible.
- Do not make more than two applications per season.
- Do not apply more than a total of 4 lbs. a.i. per acre per season.
- Do not apply preplant to Cotton.
- Do not apply within 50 feet of permanent water bodies or aquatic habitat, including, but not limited to lakes, reservoirs, rivers, streams, marshes, ponds, and estuaries.
- 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.

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 as a postplant treatment, no later than initial cracking of soil. 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. **One application:** Apply 2.5 pints in 40 gallons of water for ground application, or in 5 to 10 gallons of water for aircraft application per acre. **DO NOT** repeat this treatment. **Two applications:** 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 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 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 application as directed broadcast spray when weeds are small. For band applications, mix 2.66 pints in 40 gallons of water per acre, then apply 1 gallon of the diluted spray 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.

HIGHWAY RIGHTS-OF-WAY

This product is useful for controlling weeds listed under "USE INFORMATION" section and similar other weeds on rights-of-way. 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.

USE RESTRICTIONS

- Do not apply more than two broadcast applications per year.
- Do not apply within 100 feet of permanent water bodies or aquatic habitat, including, but not limited to lakes, reservoirs, rivers, streams, marshes, ponds, and estuaries.
- Use of this product on highway rights-of-way after December 31, 2013 is prohibited.

GOLF COURSES AND SOD FARMS

Mow turfgrass to a height of 1 to 1.5 inches before treatment. Mix 1 fluid ounce (2 tablespoonsful) of this product in 1 to 2.5 gallons of water for application to a total area of 1,000 square feet.

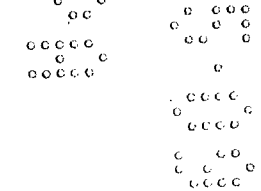
For established Bermudagrass and Zoysiagrass, mix 1 to 2 fluid ounces (2 to 4 tablespoonsful) of this product in 1 to 2.5 gallons of water for application to a total area of 1,000 square feet.

Apply during warm weather when temperature is between 80°F and 90°F. Do not water turf for at least 24 hours after application. Turfgrass may be temporarily discolored. Bermudagrass, Bluegrass, and Zoysiagrass have shown tolerance if this product is properly applied. Injury may result if applied to Bentgrass, Fescue, and St. Augustinegrass. **DO NOT apply to St. Augustinegrass except for commercial sod production. DO NOT apply to Carpetgrass, Centipedegrass, or to Dichondra. DO NOT reseed until two weeks after last application.**

For application to St. Augustinegrass in sod farms, last application can be made 4 to 5 weeks prior to lifting the sod for harvest to allow full recovery before lifting. St. Augustinegrass sod will be temporarily discolored following application. **DO NOT apply to freshly mowed St. Augustinegrass sod.**

USE RESTRICTIONS

- For newly constructed golf courses, **ONLY** one broadcast application is permitted.
- For all other applications to golf courses, this product can **ONLY** be used for spot treatments (100 sq. ft. per spot), **not to exceed 25% of the total golf course acreage per year.**
- In sod farms, **ONLY** two broadcast applications are allowed. Do not apply within 25 feet of permanent water bodies or aquatic habitat, including, but not limited to lakes, reservoirs, rivers, streams, marshes, ponds, and estuaries.
- Use of this product on golf courses and sod farms after December 31, 2013 is prohibited.



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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:

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 content 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:

Nonrefillable Container (rigid material; less than 5 gallons):

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid material; 5 gallons or greater):

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Containers:

Refillable container. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

WARRANTY—CONDITIONS OF SALE

OUR DIRECTIONS 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. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable law, 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.



Manufactured By:
Drexel Chemical Company

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

SINCE 1972

