



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

MAR 14 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Subject: Label Amendment Submission of 08/09/93 in Response to PR Notice 93-7
EPA Reg. No. 19713-113
DREXEL DSMA 81 P

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.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

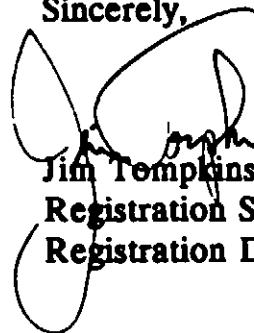
Submit the final printed labeling via the U.S. Postal Service to:

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

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. 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 containers tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. This material is incompatible with aluminum and zinc. Do not expose this concentrate or the spray solution to aluminum or galvanized metal. Store in original containers only. If the contents are leaking or material is spilled follow these steps while wearing protective clothing.

1. Collect and place in suitable containers for disposal.
2. Wash area with water and soap to remove remaining pesticide.
3. Follow washing with clean water rinse.
4. Do not allow run off to enter sewer or contaminate water supplies.
5. 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.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Barbara Brown
DREXEL CHEMICAL CO
BOX 9306
MEMPHIS TN 38109

Comment for: EPA Reg Nr.19713-113
DREXEL DSMA 81 P

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

The respirator requirement for "applicators and other handlers" in the Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "For exposures outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C). For exposures in enclosed areas, a respirator with either an organic-vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)." The exact location is shown in Sections A and B on Part I of the product Worksheet in Supplement Three-A to PR Notice 93-7.

Remove the statement "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." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

Protective eyewear is not required for early entry. Delete "Protective eyewear" from the Agricultural Use Requirements box on your proposed labeling.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

DREXEL
DSMA 81P

DSMA Powder
For Selective Post-Emergent Weed Control

ACTIVE INGREDIENTS:

Disodium Methanearsonate*.....	81.0%
INERT INGREDIENT:	19.0%
TOTAL	100.0%

Total Arsenic (as elemental)
all in water soluble form.....33.0%

*Product contains the equivalent to 128.5% Disodium
Methanearsonate Hexahydrate.

KEEP OUT OF REACH OF CHILDREN
CAUTION

Net Contents

EPA Reg. No. 19713-113
EPA Est. No. 42519-IS-1

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAR 14 1994

Under the Federal Insecticide,
Fungicide and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-113

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 IN EYES: Immediately flush eyes with plenty of water and get medical attention.

IF ON SKIN: Immediately wash skin with plenty of soap and water ~~while removing contaminated clothing and shoes.~~ If irritation develops, seek medical attention.

IF INHALED: Remove victim to fresh air.

~~DO NOT enter treated areas without protective clothing until sprays have dried.~~

delets

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMAN 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. Wash-hands-and-face-before eating-or-smoking-Wash-thoroughly-after-handling-Remove contaminated-clothing-and-wash-before-reuse. Do not contaminate feed and food stuffs. Keep-children-and-domestic-animals-off treated-areas-until-this-material-has-been-washed-into-the-soil-Do-not-apply-this-product-in-such-a-manner-as-to-directly-or through-drift-expose-workers-or-other-persons-The-area-being treated-must-be-vacated-by-unprotected-persons.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers (other than mixers and loaders) must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Chemical-resistant footwear and socks

Dust/Mist Filtering Respirator

(MSHA/NIOSH approved prefix TC-21C)

Mixers and Loaders must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Chemical-resistant footwear and socks

Protective eyewear

Chemical-resistant apron when mixing or loading

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

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

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

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.

PROTECTIVE-CLOTHING-REQUIREMENTS+

Wear-protective-clothing-when-handling-or-applying-this-product including-long-pants-long-sleeve-shirt-and-impermeable-gloves and-boots-Mixer-loaders-should-include-an-apron-and-full-face shield-when-handling-or-mixing-concentrate-Flagmen-should-be fully-protected-during-spray-operations-or-mechanical-flagmen used-Pilots-and-ground-spray-rig-applicators-should-wear-a-mask or-respirator-approved-by-the-Mining-Enforcement-and-Safety Administration-and-the-National-Institute-for-Occupational-Safety and-Health-

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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 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.

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), 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 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.

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

PPE 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, soil, or water is:

- Coveralls
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear

GENERAL INFORMATION

DSMA 81P Herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. Its activity is enhanced by addition of a suitable surfactant (approved for use on growing crops) 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 the soil.

BEST AVAILABLE COPY

MIXING INSTRUCTIONS: DSMA 81P Herbicide is completely water soluble. Fill the spray equipment tank about half full with water and add the required amount of herbicide with agitation. Finish filling the tank with water and apply. Do not store spray solution in tank for a prolonged period, and clean application equipment thoroughly after using by flushing with water. Although DSMA 81P Herbicide is only moderately corrosive, do not use in galvanized or aluminum equipment.

COTTON: DSMA 81P Herbicide is useful as a directed application in cotton for post-emergent control of weeds and grasses such as johnsongrass, nutsedge, dallisgrass, cocklebur, ragweed, sandbur and puncturevine. DSMA 81P Herbicide should be applied to weeds in cotton at the rate of 2.8 lbs./A.

If DSMA 81P Herbicide is to be applied topically (by either ground or aerial application, then a second directed application, one to three weeks after the first, may be made if regrowth occurs.

If DSMA 81P is not applied topically, then one directed application of DSMA 81P Herbicide may be made, followed one to three weeks after the first, with a second directed application of either DSMA 81P Herbicide or DSMA Liquid.

MIXING INSTRUCTIONS: Topical by ground equipment--Mix 7 lb. of DSMA 81P Herbicide in 100 gals. of water and add one to two quarts of a mild agricultural surfactant suitable for use on growing crops. Apply 40 gals. of spray solution per treated acre. For topical band application in 40" row cotton, apply 1 gal. of spray for each inch of band width per acre.

Apply only when cotton has 1 - 2 true leaves to first square. Do not feed treated foliage to livestock, or graze treated areas.

AERIAL APPLICATION: Apply at the rate of 2.8 lbs. of DSMA 81P Herbicide per acre. Mix 28 lbs. of DSMA 81P Herbicide and 1 qt. of a mild agricultural surfactant for use on growing crops in 50 gals. of water and apply at 5 gals./A.

Do not apply by air on windy days or in such a manner as will allow spray drift to come in contact with adjacent crops or non-target areas. Do not make topical applications to cotton when drought conditions or cool temperatures prevail. Apply topically only when cotton has 1 - 2 true leaves to first square formation.

DIRECTED APPLICATIONS: Mix at the rate of 7 lbs. in 100 gals. of water and add 1 - 2 qts. of a mild surfactant. Apply at a broadcast rate of 40 gals. per treated acre. For band application in 40" rows, apply 1 gal. of spray solution per inch of band width per acre of cotton.

Apply only when cotton is 2" high to first bloom. Do not feed treated foliage to livestock, or graze treated areas.

Slight burning and a reddish discoloration of the cotton leaf may occasionally occur following the recommended treatment, but the cotton plant will develop normally. DSMA 81P Herbicide should be applied with a low volume sprayer, with satisfactory pumping and by-pass action.

CITRUS-BEARING AND NON-BEARING (Except Florida): DSMA 81P Herbicide 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 3 to 6 lbs./A. Mix DSMA 81P Herbicide at the rate of 3 to 6 lbs. plus 1 to 2 qts. of a suitable surfactant, in 100 gals. of water. Apply as a directed spray in interspaces and around base of trees. 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 fruit, leaves, stems or bark. Use a shield if necessary, for plantings or young trees.

NON-CROP: DSMA 81P Herbicide is useful for controlling johnsongrass, nutsedge, and similar weeds in drainage ditchbanks, rights-of-way, storage yards, and similar non-crop areas. Mix DSMA 81P Herbicide at a rate of 3 to 6 lbs. plus 1 to 2 qts. of a suitable surfactant, in 100 gals. 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: DSMA 81P Herbicide is designed for the selective kill of dallisgrass, crabgrass, sandbur, bahiagrass, nutsedge, chickweed 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 affected, especially in hot weather. Rain or watering will revive them. Bent and fescue grasses are generally more sensitive, and may be temporarily discolored. Zoysia, bluegrasses, and bermuda are quite tolerant. Do not use on St. Augustine or centipede. Mow lawns 1 to 1.5 inches high before treatment. Mix 1.5 oz. of DSMA 81P Herbicide in 5 gals. of water containing 2 to 3 fl. oz. of a suitable surfactant, and apply to an area of 1000 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

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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.