



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

JAN 27 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Barbara Brown
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P.O. Box 9306
Memphis, TN 38109

Subject: Label Amendment Submission of 07/09/93 in Response to PR Notice 93-7
EPA Reg. No. 19713-151
DREXEL MSMA 8

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



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

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:

Submit the required notification. Then 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 as amended

AND

- **WITHIN** one year from date of this acceptance.

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**

Drexel

MSMA 8
MSMA LIQUID

For Selective
Post-Emergent Weed Control

ACTIVE INGREDIENTS:	
Monosodium Acid Methanearsonate*	58.40%
INERT INGREDIENTS:	41.60%
TOTAL	100.00%

Total Arsenic (as elemental) all in water soluble form ..27.01%

*Product contains 8 lbs. MSMA per gallon.

**KEEP OUT OF THE REACH OF CHILDREN
CAUTION**

EPA Reg. No. 19713-151
EPA Est. No. 19713-TN-1

Net Contents:

Revisions 6/93

Manufactured By:
Drexel Chemical Company
P.O. Box 9306 MEMPHIS, TN 38109-0306

ACCEPTED
with COMMENTS
In EPA Letter Dated

JAN 27 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-151

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 spray have dried.

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 food stuffs.

PERSONAL PROTECTIVE EQUIPMENT (PPE)
Applicators and other handlers (other than mixers and loaders) who may be exposed to the dilute through application or other tasks must wear:
Coveralls
Waterproof gloves
Chemical-resistant footwear plus socks

Mixers and Loaders who may be exposed to the concentrate through mixing, loading, application or other tasks must wear:
Coveralls
Waterproof gloves
Chemical-resistant footwear plus socks
Protective eyewear

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.

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 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.

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
- Chemical-resistant footwear plus socks
- Protective eyewear

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.

MSMA 8 Herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. Its activity is enhanced by 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: MSMA 8 Herbicide 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: MSMA 8 Herbicide is useful as a directed application in cotton for the post-emergent control of weeds and grasses such as johnsongrass, nutsedge, dallisgrass, cocklebur, ragweed, sandbur and puncturevine. It should be applied at the rate of 1 quart per acre.

Add 5 pints of MSMA 8 Herbicide and 1 to 2 quarts of a suitable surfactant* to 100 gallon 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: MSMA 8 Herbicide is useful for controlling johnsongrass, nutsedge, and certain other weeds on drainage ditchbanks, rights-of-way, storage yards, and similar non-crop areas.

Mix MSMA 8 Herbicide at a rate of 2 to 5 pints, plus 1 to 2 quarts of a suitable surfactant* in 100 gallons 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. * A suitable surfactant is one that is cleared for application to growing crops. Do not contaminate waters used for domestic consumption or by animals, wildlife and aquatic life, or for irrigation purposes.

LAWN AND ORNAMENTAL TURF: MSMA 8 Herbicide is useful for control of dallisgrass, sandbur, bahiagrass, nutsedge, crabgrass, 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 discolored. Zoysia, bluegrasses, and bermuda are quite tolerant. Do not use on St. Augustine or centipede. Keep children and domestic animals off treated areas until material has been washed into soil. Mow lawns 1 to 1-1/2 inches high before treatment. Mix 1 fluid ounce (2 tablespoons) of MSMA 8 Herbicide and 1/2 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

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 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 believed reliable. Follow directions carefully. Timing and of application, weather and crop conditions, mixtures with chemicals not specifically recommended, and other influence factors in the use of this product are beyond the control of seller. Buyer assumes all risks of use, storage and handling 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 same with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company is accepted as such by the Buyer.