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File



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

7/13/93

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Barbara Brown  
DREXEL CHEMICAL COMPANY  
P. O. Box 9306  
2487 Pennsylvania Street  
Memphis, TN 38109

Subject: Label Amendment Submission of 07/09/93 in Response to PR Notice 93-7  
EPA Reg. No. 19713-153  
KACK PLUS MSMA HERBICIDE

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 SoyCanada Ink on paper that  
contains at least 50% recycled fiber

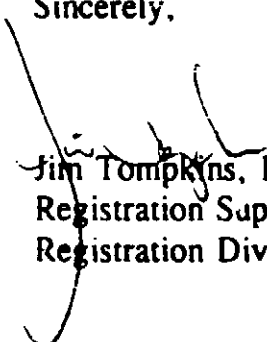
Submit the final printed labeling via the U.S. Postal Service to:

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

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Barbara Brown  
DREXEL CHEMICAL COMPANY

Comments for: EPA REG. NO. 19713-153  
Knack Plus MSMA HERBICIDE

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

The requirement under heading "Personal Protective Equipment" must state: "Applicators and other handlers must wear:" If you retain your separate PPE section for mixer and loaders, then the heading should read "Applicators and other handlers (other than mixers and loaders) must wear:"

Move 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 in the Agricultural Use Box to the "Directions for Use"

The statement "Notify workers of the application by warning them orally and by posting warning signs at the entrance to treated areas." is not required for your product. You may remove it.

Protective eyeware is not required for early entry. You may delete "protective eyeware from the Agricultural Use Requirements box.

The respirator requirement for "applicators and other handlers" in the Personal Protective Equipment Section should read

For exposure outdoors: Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

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)

The respirator requirement for "mixer and loaders" in the Personal Protective Equipment Section should read

For exposure outdoors: Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

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)

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

Correct the typographical errors circled on your proposed label.

5/9

DREXEL  
KACK PLUS MSMA  
HERBICIDE

MSMA, Sodium Cacodylate and  
Cacodylic Acid Liquid Plus Surfactant  
For General Post-Emergent Weed Control

ACTIVE INGREDIENTS

Monosodium Acid  
Methenearsonate.....26.12%  
Sodium Cacodylate.....10.49%  
Dimethylarsinic Acid  
(Cacodylic Acid).....1.79%

INERT INGREDIENTS.....61.60%

TOTAL..... 100.00%

Total Arsenic (as elemental) all in water soluble form....17.92%

Product contains 3.00 lbs. MSMA and 1.25 lbs. cacodylic acid  
equivalent per gallon.

KEEP OUT OF THE REACH OF CHILDREN  
CAUTION

Revisions 6/93

EPA Registration No. 19713-153  
EPA Establishment No. 19713-MS-1

NET CONTENTS:

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

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

APR 18 1994

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
19213-153

**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 fingers. 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.

**BEST AVAILABLE COPY**

**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.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**  
**Applicators and other handlers wear:**  
 Long-sleeved shirt and long pants  
 Waterproof gloves  
 Chemical-resistant footwear plus socks  
 Dust/Mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C)

**Mixers and Loaders must wear:**  
 Long-sleeved shirt and long pants  
 Waterproof gloves  
 Chemical-resistant footwear plus socks  
 Protective eyewear  
 Chemical resistant apron when cleaning, 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 pesticides gets inside. Then wash thoroughly and put on clean clothing.

**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. The area being treated must be vacated by unprotected persons.

**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:**

**BEST AVAILABLE COPY**

**DIRECTIONS FOR USE:**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

For any directions 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 (Reentry Interval - 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

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

**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.

**BEST AVAILABLE COPY**

## GENERAL INFORMATION

KACK PLUS MSMA Herbicide is a special formulation of herbicides in combination with a surface-active (wetting) agent, for general post-emergent weed control. It is unnecessary to add any other surfactant to the spray solution. This product is effective on both broadleaf weeds and grasses. The phytotoxic properties of these materials are quickly inactivated on contact with the soil. Best results are obtained on young actively growing weeds at air temperatures above 70°F.

## MIXING INSTRUCTIONS

KACK PLUS MSMA 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. After use, clean equipment thoroughly by flushing with water. Do not store spray solution in tank for a prolonged period. Although KACK PLUS MSMA Herbicide is only moderately corrosive, do not use in galvanized or aluminum equipment.

## USE INSTRUCTIONS

KACK PLUS MSMA Herbicide is a post-emergent herbicide useful for controlling broadleaf weeds and grasses, such as puncturevine, wild mustard, wild oats, chickweed, sandbur, common ragweed, pigweed, crabgrass, lambsquarter, common plantain, prostrate spurge, giant foxtail and yellow foxtail; and to top-kill certain perennials such as johnsongrass, dallisgrass and nutsedge.

KACK PLUS MSMA Herbicide is useful for general weed control on drainage ditchbanks, rights-of-way, fence rows, and storage yards; along highways, utility lines and pipe lines; around power plants and buildings, and on similar non-crop areas.

Use KACK PLUS MSMA Herbicide at the rate of 1 to 2 gallons per acre in sufficient water to get full coverage. Ground application normally requires 40 to 100 gallons of spray solution per acre. Any spray equipment that gives good coverage may be used, if regrowth occurs reapply as required.

Bindweed (Morningglory) control: Use 1 1/2 to 2 gallons of KACK PLUS MSMA Herbicide in 50 to 100 gallons of water per acre. Make first application at first bloom, wetting foliage just short of run-off. Repeat application as needed for top-kill, but limit to three applications per year.



**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**STORAGE INSTRUCTIONS**

Storage should be under lock and key in a ventilate room 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 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. Do not store or use in aluminum or galvanized equipment. Avoid storage near water supplies, food, feed 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 a material such as saw dust, clay granules or dirt.
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 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 indicate 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 RECOMMENDATION FOR USE of this product are based upon test 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.