

File



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

MAR 14 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Barbara Brown
DREXEL CHEMICAL COMPANY
BOX 9306
MEMPHIS, TN 38109

Subject: Label Amendment Submission of 07/09/93 in Response to PR Notice 93-7
EPA Reg. No. 19713-162
MSMA6 TREEKILLER

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

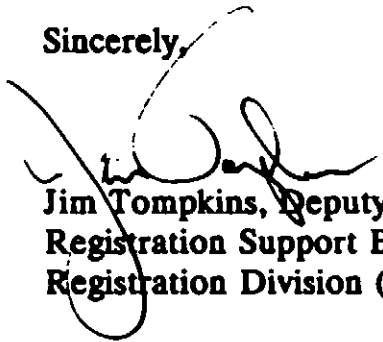
Submit the final printed labeling via the U.S. Postal Service to:

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

BARBARA BROWN
DREXEL CHEMICAL COMPANY.

Comments for: EPA REG. NO. 19713-162
MSMA6 TREEKILLER

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

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 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:"

Protective eyeware is not required for early entry. You may delete "protective eyeware from the early entry PPE in the Agricultural Use Requirements box on your proposed labeling.

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 if you retain separate PPE for mixer/loaders 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)

You must apply for a deviation if you want to retain only the D/M respirator on your proposed label.

418

Drexel

MSMA 6

TREE KILLER

For General Forestry Use

ACTIVE INGREDIENTS:

Monosodium Acid	
Methanearsonate.....	47.60%
INERT INGREDIENTS.....	52.40%
TOTAL.....	100.00%
Total Arsenic (as elemental)	
all in water soluble form.....	22.03%

Product contains 6.0 lbs. MSMA per gallon.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

EPA Registration No.: 19713-162
EPA Establishment No.: 19713-MS-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

MAR 14 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-162

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 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.

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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)

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.

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.

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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.

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.

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.

GENERAL INFORMATION:

MSMA 6 Tree Killer is designed for crown kill of undesirable trees through spaced-cut injection methods. It is useful for the control of the following conifers: lodgepole pine, ponderosa pine, Douglas fir, jack pine, and red pine. It is also useful for the control of big leaf maple. It shows negligible translocation through root grafts and has no residual phytotoxic action in the soil.

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USE INSTRUCTIONS

SPACED-CUT INJECTION WITH ANSUL "HYPO-HATCHET" INJECTOR:

The Ansul HYPO-HATCHET Injector cuts and injects in one operation. When a tree is struck with the injector, a pre-set amount of MSMA 6 Tree Killer is injected automatically into the sapstream of the tree immediately after impact. The injector works by inertia and is designed to inject at least one milliliter of chemical per stroke. The cuts should be evenly spaced around the trunk to give proper distribution into the sapwood. For detailed instructions on how to use the Ansul HYPO-HATCHET Injector, refer to the Operation Manual.

CONIFERS (See General Information) AND BIG LEAF MAPLE (Growing Season)-For trees below 8 inches diameter at breast height (DBH), make one cut per 2 inches of DBH (4 1/2 spacing between cut edges) at waist height or below. For trees 8 inches DBH and larger, make one cut per 1 inch DBH (1 1/2" spacing between cut edges).

CONIFERS (Dormant Season) - Make one cut per 1 inch of DBH (1 1/2" spacing between cut edges) at waist height or below.

BIG LEAF MAPLE (Dormant Season) - Make a complete frill at waist height or below (cuts need not be overlapping).

SPACED-CUT APPLICATION:

Although spaced-cut application is facilitated by use of the Ansul HYPO-HATCHET Injector, a hatchet or similar cutting tool can be used. The number of cuts per tree depends upon the size of the cuts and the volume to be injected, but in any case, should be sufficient to hold the herbicide without running down the trunk. Make certain that each cut penetrates into the sapwood. Apply MSMA 6 Tree Killer with a pump-type oil can, plastic squeeze bottle, or other suitable dispenser.

CONIFERS (See General Information) AND BIG LEAF MAPLE (Growing Season) - For trees below 8 inches diameter breast height (DBH), apply 1 to 2 milliliters of MSMA 6 Tree Killer per cut per 2 inches of DBH (6" spacing between cut centerlines) at waist height or below. For trees 8 inches DBH and larger, use 1 to 2 milliliters per cut per 1 inch DBH (3" spacing between centerlines).

CONIFERS (Dormant Season) - Apply 1 to 2 milliliters of MSMA 6 Tree killer per cut per 1 inch of DBH (3" spacing cut centerlines).

BIG LEAF MAPLE (Dormant Season)- Apply 1 to 2 milliliters of MSMA 6 Tree Killer per cut in a complete frill at waist height or below. (Cuts need not be overlapping.)

HYPO-HATCHET is a registered trademark of The Ansul Company.

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. 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 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 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 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 dance 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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