

19713-162

4-16-2002

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 16 2002

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

Dear Mr. Piwonka:

Subject: Label Amendment
DREXEL MSMA 6 Treekiller
EPA Reg. No. 19713-162
Your submission dated November 21, 2001

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Under the heading Precautionary Statements and Agricultural Use Requirements, replace "waterproof gloves" with the following:

Chemical resistant gloves Category A, such as butyl rubber \geq 14 mils, or natural rubber \geq 14 mils, or neoprene rubber \geq 14 mils or nitrile rubber \geq 14 mils.

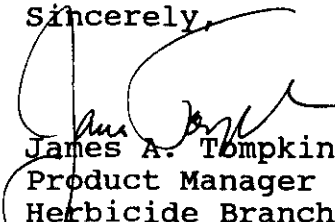
2. Under the heading Precautionary Statements, outdoors" revise to read as follows:

A NIOSH approved respirator with any R, P or HE filter.

Submit one (1) copy of your final printed labeling before you release the product for shipment. The enclosed stamped label supersedes all previous labels.

A stamped copy of the labeling is enclosed for your records.

Sincerely,


James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

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ACCEPTED
with COMMENTS
In EPA Letter Dated:

APR 16 2002

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



MSMA 6

TREE KILLER

For general forestry use

ACTIVE INGREDIENT:

Monosodium acid
methanearsonate 47.6%

OTHER INGREDIENTS: 52.4%

TOTAL: 100.0%

Total Arsenic (as elemental), all in water-soluble form, is 22.03%.
This product contains 6.0 pounds of MSMA per gallon.

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA Reg. No. 19713-162

EPA Est. No. 19713-MS-1 Net Contents: _____

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.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

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 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 Telecommunications Network at 1-800-858-7378.

PRECAUTIONARY STATEMENTS (Cont.)

For exposures in enclosed areas: A respirator with 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-14C), or a NIOSH approved respirator with an organic-vapor (OV) cartridge or canister with any R, P or HE prefilter.

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: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing 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

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.

Note: Add this statement to all container sizes of 5 gallons and higher. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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 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.

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 foodstuffs.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers 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.

For exposure outdoors: Dust/Mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P or HE filter.

(Continued)

Manufactured By:



Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113

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, waterproof gloves, chemical-resistant footwear 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 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.

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 in diameter at breast height (DBH), make one cut per 2 inches of DBH (4.5" spacing between cut edges) at waist height or below. For trees 8 inches DBH and larger, make one cut per 1 inch DBH (1.5" spacing between cut edges).

CONIFERS (Dormant Season)- Make one cut per 1 inch of DBH (1.5" 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 in 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.)

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 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 sawdust.
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 runoff 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 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 Manufacturer and is accepted as such by the Buyer.