

19713-162

5-20-2002

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Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20480

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-162	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL MSMA 6 TREEKILLER	PM# 25/Herbicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company, P.O. Box 13327 MEPHIS, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>4/16/2002</u>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below. NOTIFICATION

Explanation: Use additional page(s) if necessary. (For section I and Section II.) MAY 20 2002

One (1) copy of the final printed label (162SP-0402++) is submitted for your record and file. Label changes are detailed out on the cover letter accompanying this submission. The required certification statement per PR Notice 98-10 is also submitted. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name LUZ G PIWONKA	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamp)
2. Signature <i>Luz G. Piwonka</i>	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G PIWONKA	5. Date May 8, 2002	



Drexel Chemical Company

May 8, 2002

**Submission of Final Printed Label per EPA's Letter dated April 16, 2002
DREXEL MSMA 6 TREEKILLER (EPA Reg. No. 19713-162)**

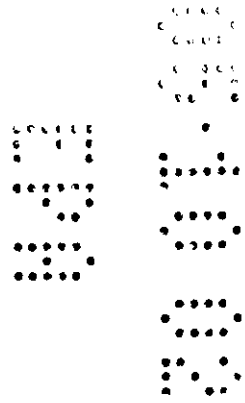
This notification is consistent with the Provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

FOR DREXEL CHEMICAL COMPANY

Luzy G. Piwonka

LUZ G PIWONKA
Registration Manager

NOTIFICATION
MAY 20 2002





Drexel Chemical Company

May 8, 2002

Document Processing Desk (FINAL)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm 266A, Crystal Mall 2
1921 Jefferson Davis Hwy.
Arlington, VA 22202

ATTN: Mr. Jim Tompkins, PM 25/Herbicide Branch

**Re: Submission of Final Printed Label per EPA's Letter Dated April 16, 2002
DREXEL MSMA 6 TREEKILLER (EPA Reg. No. 19713-162)**

Dear Mr. Tompkins,

Reference is made to the above. Herewith, please find:

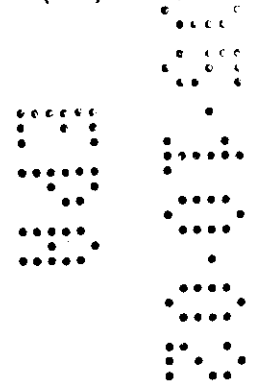
- 1. Completed EPA Form 8570-1.
- 2. One (1) copy of the final printed label (162SP-0402++) for your record and file. Please take note of the following changes:
 - i) Under PPE, the statement "Some materials that are chemical-resistant.....selection chart." was added.
 - ii) Waterproof gloves was changed to chemical-resistant gloves such as polyethylene or polyvinyl chloride under PPE and in the Agricultural Use Requirements box.
 - iii) Under Precautionary Statements, the statement was revised to read "For exposure outdoors: A NIOSH approved respirator with any R, P or HE filter."
- 3. Certification Statement per PR Notice 98-10

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370. My e-mail address is lpiwonka@drexchem.com.

Thank you.

Respectfully,
DREXEL CHEMICAL COMPANY

Luz G. Piwonka
Luz G Piwonka
Registration Manager



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NOTIFICATION

MAY 20 2002

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 Information Center at 1-800-858-7378.

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)
Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on EPA chemical-resistance category selection chart.

(Continued)

PRECAUTIONARY STATEMENTS (Cont.)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves such as polyethylene or polyvinyl chloride, chemical-resistant footwear plus socks, protective eyewear, chemical-resistant apron when cleaning, mixing or loading.

For exposure outdoors: A NIOSH approved respirator with any R, P or HE filter.

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-14G), 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.

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.

Manufactured By:



Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113

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.

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, chemical-resistant gloves such as polyethylene or polyvinyl chloride, 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.

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 inches 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 inches spacing between cut edges).

CONIFERS (Dormant Season)-Make one cut per 1 inch of DBH (1.5 inches 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 inches 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 inches spacing between centerlines).

CONIFERS (Dormant Season)- Apply 1 to 2 milliliters of MSMA 6 Tree Killer per cut per 1 inch of DBH (3 inches 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—CONDITIONS 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.