

19713-267

5/26/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

MAY 26 2009

Subject: Label Amendments for Compliance with Organic Arsenicals Agreement
EPA Reg. Nos.; Product Name:
19713-267; DREXEL MSMA 4 PLUS
Application Dated: March 3, 2009

Dear Luz Chan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the following changes before you release the product for shipment.

- a. Remove the following statement as it does not pertain to products used on sod farms:
"Not for use on plants being grown for sale or other commercial use of for commercial seed production or for research purposes."

Submit one (1) copy of final printed labeling for each product incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

ACCEPTED
with COMMENTS
in EPA Letter Dated
MAY 26 2009

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

19713-267

Drexel

MSMA 4 Plus

MSMA 4 Plus Surfactant

For Selective Postemergent Weed Control on Highway Rights-of-Way, Golf courses, and Sod farms.

ACTIVE INGREDIENT:

Monosodium acid methanearsonate* 35.78%

OTHER INGREDIENTS: 64.22%

TOTAL: 100.00%

*Total Arsenic (as elemental), all in water-soluble form, is 16.55%.

*This product contains 4 pounds of MSMA per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See **FIRST AID** Below

SHAKE WELL BEFORE USING

EPA Reg. No. 19713-267

EPA Est. No. 19713-XX-XXX

Net Content: _____

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.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

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 further 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.

(Continued)

PRECAUTIONARY STATEMENTS (Cont.)

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are polyethylene or polyvinyl chloride. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicator and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves, and shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

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

Do not apply directly to 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.

USE INFORMATION

MSMA 4 Plus herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. It is unnecessary to add any other surfactant to the spray solution. Best results are obtained on young, actively growing weeds at air temperatures above 70°F. Not for use on plants being grown for sale or other commercial use or for commercial seed production or for research purposes. For use in Highway Rights-of-Way, Golf courses and Sod farms.

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 through any type of irrigation system. 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 APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM.

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

MIXING INSTRUCTIONS: This product is completely water-soluble. Fill the spray equipment about half full with water and add the required amount of herbicide with agitation. Finish filling 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 this product is only moderately corrosive, do not use in galvanized or aluminum equipment.

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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, 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 (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 Category A such as polyethylene or polyvinyl chloride, and 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 WPS for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep children and pets out of treated area until sprays have dried.

HIGHWAY RIGHTS-OF-WAY

This product is useful for control of Johnsongrass, Nutsedge and certain other weeds on rights-of-way, highways, roadsides and associated rights-of-way. Mix this product at a rate of 2 to 5 quarts in 100 gallons of water. Spray unwanted vegetation thoroughly to just short of runoff. Any spray equipment that gives good coverage may be used. If regrowth occurs, reapply as required.

USE RESTRICTIONS

- Do not apply more than two broadcast applications per year.
- Do not apply within 100 feet of permanent water bodies or aquatic habitat, including, but not limited to lakes, reservoirs, rivers, streams, marshes, ponds, and estuaries.
- Use of this product on highway rights-of-way after December 31, 2013 is prohibited.

GOLF COURSES AND SOD FARMS

Mow turfgrass to a height of 1 to 1.5 inches before treatment. Mix 1.5 fluid ounces (3 tablespoonsful) of this product in 1 to 2.5 gallons of water for application to a total area of 1,000 square feet.

For established Bermudagrass and Zoysiagrass, mix 1 to 2 fluid ounces (2 to 4 tablespoonsful) of this product in 1 to 2.5 gallons of water for application to a total area of 1,000 square feet.

Apply during warm weather when temperature is between 80°F and 90°F. Do not water turf for at least 24 hours after application. Turfgrass may be temporarily discolored. Bermudagrass, Bluegrass, and Zoysiagrass have shown tolerance if this product is properly applied. Injury may result if applied to Bentgrass, Fescue, and St. Augustinegrass.

DO NOT apply to St. Augustinegrass except for commercial sod production. DO NOT apply to Carpetgrass, Centipedegrass or to Dichondra. DO NOT reseed until two weeks after last application.

For application to St. Augustinegrass in sod farms, last application can be made 4 to 5 weeks prior to lifting the sod for harvest to allow full recovery before lifting. St. Augustinegrass sod will be temporarily discolored following application. DO NOT apply to freshly mowed St. Augustinegrass sod.

USE RESTRICTIONS:

- For newly constructed golf courses, ONLY one broadcast application is permitted.
- For all other applications to golf courses, this product can ONLY be used for spot treatments (100 sq. ft. per spot), not to exceed 25% of the total golf course acreage per year.
- In sod farms, ONLY two broadcast applications are allowed. Do not apply within 25 feet of permanent water bodies or aquatic habitat, including, but not limited to lakes, reservoirs, rivers, streams, marshes, ponds, and estuaries.
- Use of this product on golf courses and sod farms after December 31, 2013 is prohibited.

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 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 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 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:

Nonrefillable Container (rigid material; less than 5 gallons):

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid material; 5 gallons or greater):

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Containers:

Refillable container. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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WARRANTY—CONDITIONS OF SALE

OUR DIRECTIONS 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. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable law, 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 Seller and is accepted as such by the Buyer.



Manufactured By:
Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

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