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

JAN 14 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Barbara Brown  
DREXEL CHEMICAL CO.  
BOX 9306  
MEMPHIS, TN 38109

Subject: Label Amendment Submission of 07/09/93 in Response to PR Notice 93-7  
EPA Reg. No. 19713-269  
IDA, INC. MSMA 6.6

**IMPORTANT NOTICE:** This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**SERIOUS ERROR(S) ON SUBMITTED LABELING:**

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

**YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING.** Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

**YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.**

1 of 11



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director  
Compliance Division, (7203)  
Worker Protection Notification  
Office of Compliance Monitoring  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:**

Submit the required notification. Then 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 as amended

**AND**

- WITHIN one year from date of this acceptance.

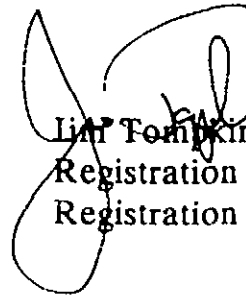
Submit the final printed labeling via the U.S. Postal Service to:

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 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,



Lita Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

**Personal Protective Equipment (PPE):**

Applicators and other handlers must wear: ~~except when~~

- \* Long-sleeved shirt and long pants
- \* Waterproof gloves
- \* Chemical-resistant footwear plus socks
- \* Protective eyewear
- \* Chemical-resistant apron when cleaning equipment, mixing or loading

For exposures 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)

For exposure outdoors:

- \* Dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

Change respirator statement from applicators and other handlers as indicated above.

IDA, INC.

MSMA 6.6

MSMA LIQUID  
For Selective  
Post-Emergent Weed Control

ACTIVE INGREDIENTS:

Monosodium Acid Methanearsonate\*.....51.0%

INERT INGREDIENTS:.....49.0%

Total Arsenic (as elemental)

all in water soluble form.....23.61%

\*Product contains 6.6 lbs. MSMA per gallon.

KEEP OUT OF REACH OF CHILDREN  
CAUTION

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 SPLASHED IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention.

IF SPILLED ON SKIN: Immediately remove contaminated clothing, INCLUDING SHOES, and wash skin with soap and plenty of water. If irritation develops, send for a physician.

IF INHALED: Remove victim to fresh air

Revisions 6/93

EPA Reg. No. 19713-269  
EPA Est. No. 19713-MS-1

NET CONTENTS GALLONS

LITERS

DREXEL CHEMICAL COMPANY  
P O Box 9306  
Memphis, Tn 38109

ACCEPTED  
with COMMENTS  
(in EPA Letter Dated

JAN 14 1994  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
19713-269

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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 foodstuffs. Avoid breathing of dust. Do not take internally.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators and other handlers must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Chemical-resistant footwear and 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 and 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**

Users should:

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.

**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.**

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), 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 (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 6.6 Herbicide is useful for selective post-emergent weed control, particularly for grassy weeds. Its activity is enhanced by addition of a suitable surfactant to the spray solution. It is most effective on young, actively growing weeds at air temperatures above 70°F. Its phytotoxic properties are quickly inactivated on contact with soil.

**MIXING INSTRUCTIONS:** MSMA 6.6 Herbicide must be thoroughly dissolved. Fill the spray equipment reservoir about half full with water and add the required amount of herbicide and surfactant with agitation. Finish filling the reservoir with water and apply. After use, clean equipment thoroughly by flushing with water. Do not store spray solution in tank for a prolonged period.

**COTTON:** MSMA 6.6 Herbicide is useful as a directed application in cotton for the post-emergent control of weeds and grasses such as johnsongrass, nutsedge, Dallisgrass, cocklebur, barnyardgrass, ragweed, sandbur and puncture vine. It should be applied at the rate of 2-1/2 pints per acre.

Add 6 pints of MSMA 6.6 Herbicide and 1 to 2 quarts of a suitable surfactant to 100 gallons of water and mix thoroughly. Apply spray solution at 40 gallons per acre. Weed control is most effective at temperatures above 70° F. For band application in 40 inch rows, apply 1 gallon of spray solution per inch of band width per acre. Direct the spray solution to the base of the cotton plant. Nozzles should be placed so as to avoid spraying the cotton foliage. A second application may be required during humid growing conditions to control perennials, such as johnsongrass and nutsedge. Apply the second application 1 to 3 weeks later.

Slight burning and a reddish discoloration of the cotton leaf may occasionally occur following the recommended treatment, but the cotton plant will develop normally.

**APPLY ONLY WHEN COTTON IS 3 INCHES HIGH TO FIRST BLOOM. DO NOT APPLY AFTER FIRST BLOOM. DO NOT FEED TREATED FOLIAGE TO LIVESTOCK, OR GRAZE TREATED AREAS.**

**NON-CROP:** MSMA 6.6 Herbicide is useful for controlling johnsongrass, nutsedge, barnyardgrass, and other weeds on drainage ditch banks, right of way, storage yards, and similar non-crop areas.

Mix MSMA 6.6 Herbicide at a rate of 3 to 6 pings, plus 1 to 2 quarts of a suitable surfactant in 100 gallons of water. Spray the unwanted vegetation thoroughly to just short of run-off. Any spray equipment that gives good coverage may be used. If regrowth occurs, reapply as required.

DO NOT CONTAMINATE WATERS USED FOR DOMESTIC CONSUMPTION OR BY ANIMALS, WILDLIFE AND AQUATIC LIFE, OR FOR IRRIGATION PURPOSES.

LAWN AND ORNAMENTAL TURF: MSMA 6.6 Herbicide is useful for control of dallisgrass, sandbur, bahiagrass, nutsedge, barnyardgrass, chickweed and wood sorrel with little or no injury to good lawn grasses. On new lawns, do not treat until after three mowings. Good grasses may be temporarily discolored. Zoysia, bluegrass, and bermuda are quite tolerant. Do not use on St. Augustine or Centipede.

Mow lawns 1 to 1-1/2 inches high before treatment. Mix 1 fluid ounce (2 tablespoons) of MSMA 6.6 Herbicide and 1/2 fluid ounce (1 tablespoon) of a suitable surfactant in 5 gallons of water and apply to an area of 1,000 square feet. Spray thoroughly to wet all undesirable plants. Repeat applications, 10 to 14 days apart, may be needed for good control

DO NOT apply with hose-end applicators.

#### 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:**

**DIRECTIONS FOR USE** of this product are based on field use and tests believed reliable and should be followed carefully. It is however impossible to eliminate all risks associated with use of this product. Because such factors as weather conditions, foreign material and manner of use for application are all beyond the control of the Seller of this product, such things as crop injury, ineffectiveness or other unintended consequences may result.

**All SUCH RISKS ARE ASSUMED BY THE BUYER**

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the directions for use. Seller makes no other warranties, express or implied, including **FITNESS OR MERCHANTABILITY**. In no case shall the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.