

19713-550

05/26/2009

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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
MSMA products

EPA Reg. Nos.; Product Name:

19713-41; DREXEL MSMA 6.6

19713-151; DREXEL MSMA 8

19713-269; DREXEL MSMA 6.6 LIQUID

19713-529; DREXEL MSMA 600

19713-531; DREXEL MSMA 660

19713-550; DREXEL MSMA 120

Applications 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.

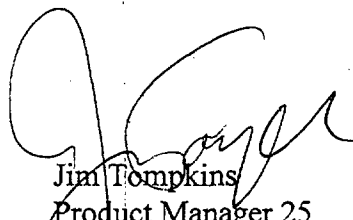
- a. Label must include Spray Drift Management text.
- b. All pre-emergent applications to cotton must be removed from this label (e.g. 'Postplant up to cracking of soil before cotton emergence')
- c. The text above the ingredient statement must be revised to list the specific use sites instead of 'listed crops.'
Ex: "For Selective Postemergent Weed Control on (list the specific sites...Highway ROW, Golfcourses, Sodfarms, and/or Cotton)."
- d. Label must include the following pilot engineering controls text:
"Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(60)]."

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- e. Submit the following confirmatory data to support the use of MSMA on cotton no later than August 30, 2010:
 - a. Magnitude of the residue in meat and milk (Guideline 860.1480)
 - i. Registrants must develop confirmatory data that demonstrate no detectable residues of inorganic arsenic will be found in the edible tissues and milk of cows consuming cotton feed items treated with MSMA. Data may be developed in a tiered fashion.
 - b. Field rotational crop study (Guideline 860.1900)
 - i. Registrants must provide data demonstrating no residues of inorganic arsenic in food crops (peanuts) that are rotated with cotton. This requirement may be satisfied with data from the open literature or a new study conducted in accordance with Guideline 860.1900.

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.

19713-550



MSMA 120

Arsonate Liquid For Postemergence Weed Control

ACTIVE INGREDIENT:

Monosodium acid methanearsonate 52.8%

OTHER INGREDIENTS: 47.2%

TOTAL: 100.0%

This product contains 6.6 pounds of MSMA per gallon.
Total Arsenic (as elemental), all in water-soluble form, is 23.7%.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

SHAKE WELL BEFORE USING

EPA Reg. No. 19713-550

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.

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. Avoid contact with eyes, skin and clothing. May cause irritation of nose, throat and skin. Avoid breathing spray mist.

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.

(Continued)

PRECAUTIONARY STATEMENTS (Cont'd)

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, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

USE INFORMATION

MSMA 120 is a herbicide for use in Cotton, Highway Rights-of-Way, Golf courses, and Sod farms. This product does not contain a surfactant. A suitable non-ionic surfactant approved for growing crops covered by this label should be added to the spray tank. Local conditions and recommendations vary; consult local agricultural experiment station or extension service weed specialists for recommendations in your area.

A partial list of weeds controlled with this product includes:

- | | | |
|--------------------|--------------------|--------------|
| Bahiagrass | Crabgrass | Morningglory |
| Barnyardgrass | (smooth and large) | Nutsedge |
| Beggartick (hairy) | Dallisgrass | Pigweed |
| Brachiaria spp. | Foxtail | Puncturevine |
| Broomsedge | (green and yellow) | Ragweed |
| Chickweed | Goosegrass | Sandbur |
| Cocklebur* | Guineagrass | Watergrass |
| | Johnsongrass | Wood sorrel |

*Arsenical resistant varieties may not be controlled.
See Golf Course and Sod Farm Uses for weeds controlled at those sites.



Manufactured By:
Drexel Chemical Company

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

SINCE 1972

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 made of any waterproof material 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 the treated area until sprays have dried.

APPLICATION RESTRICTIONS

- Do not apply this product in Florida except on Cotton in the counties listed in the Cotton use section of this label.
- Aerial application is prohibited, except when applying to Cotton.

MIXING INSTRUCTIONS

This product must be thoroughly dissolved. Fill the tank about half full with water and with the pump operating, add the required amount of product, finish filling the tank with water and apply.

If preferred, this product can be premixed by dissolving the required amount of product and suitable non-ionic surfactant in 3 to 5 gallons of water in an open head bucket. This pre-mix should then be placed in the partly filled spray tank and the tank filled.

Do not store spray solution in tank for a prolonged period. Clean application equipment thoroughly after use by flushing with water.

CHEMIGATION PROHIBITION

Do not use this product in any type of irrigation system.

APPLICATION METHODS

This product should be applied with a low volume sprayer having satisfactory pumping and bypass action. Nozzles should be placed so as to avoid spraying Cotton foliage, but also to give good coverage of weeds and grasses. Proper coverage is very important. Adjust nozzles to allow maximum coverage of weeds and grasses.

Adjust nozzles to direct the spray in a manner to allow maximum coverage of weeds. Keep spray off Cotton foliage.

COTTON

This product is useful for the control of weeds listed in the "USE INFORMATION" section and many similar weeds. Applications can be made: 1) Postemergent, over the top, when Cotton is 3 to 6 inches high or up to early first square stage, whichever occurs first using ground or aircraft equipment. 2) Postemergent as a directed spray with ground equipment when Cotton is 3 inches high to first bloom. Slight burning and a reddish discoloration of the Cotton leaf may occasionally occur following application, but the Cotton plant will develop normally.

USE RESTRICTIONS

- Do not apply in Florida except on Cotton grown in the following counties: Calhoun, Columbia, Escambia, Gadsden, Hamilton, Holmes, Jackson, Jefferson, Okaloosa, Santa Rosa, Suwannee, Walton, and Washington.

Note: Applications to Cotton in Florida should be confined to band treatments.

- Only one application at 2 lbs. a.i. (2.66 pts. of this product) per acre is allowed per season, except when a salvage operation is needed.
- If a salvage operation is needed (i.e., if pigweed escapes the first application), then a second or repeat application at 2 lbs. a.i. (2.66 pts. of this product) per acre is allowed.
- A second or repeat application, if needed, should be timed 1 to 3 weeks after the first application. Apply only as a salvage operation. Apply only to healthy rapidly growing Cotton 3 inches high, but no later than 6 inches high or early square, whichever occurs first. Preference should be given to directed spray. In order to minimize injury, the second application should be made as a directed spray when possible.
- Do not make more than two applications per season.
- Do not apply more than a total of 4 lbs. a.i. per acre per season.
- Do not apply preplant to Cotton.
- Do not apply within 50 feet of permanent water bodies or aquatic habitat, including, but not limited to lakes, reservoirs, rivers, streams, marshes, ponds, and estuaries.
- Do not allow spray or spray drift to contact adjacent crops or injury will result.
- Apply only on still days when weather conditions do not favor drift from areas being treated. Aircraft applications of this product should only be made by applicators experienced in use of herbicides, and application should be made in accordance with State and Federal regulations.

Postplant up to Cracking Application: If planting of Cotton has been delayed and weeds have emerged, a single ground or aircraft application of this product can be made as a postplant treatment, no later than initial cracking of soil. Mix at the rate of 2.3 pints of this product in 40 gallons of water for ground equipment or in 5 to 10 gallons of water for aircraft application per acre of Cotton.

Postemergent Applications Using Ground or Aircraft Equipment as an Over-the-Top Broadcast Spray when Cotton is 3 inches high until early first square stage as a salvage operation. **One application:** Use 2.2 pints in 40 gallons of water for ground application, or in 5 to 10 gallons of water for aircraft application per acre. **DO NOT** repeat this treatment. **Two applications:** Mix at the rate of 0.9 to 1.1 pints of this product in 40 gallons of water for ground equipment or in 5 to 10 gallons of water for aircraft application per acre of Cotton. If needed, a second or repeat application should be made 1 to 3 weeks after the first application. Apply only as a salvage operation. Apply only to healthy, rapidly growing Cotton, 3 inches high, but no later than 6 inches high or early square, whichever occurs first. Preference should be given to directed sprays. In order to minimize injury, the second application should be made as a directed spray when possible. **DO NOT** make more than two applications per season. Do not feed foliage to livestock or graze treated areas.

Postemergent Directed Spray Applications: Mix this product at the rate of 2.3 pints in 40 gallons of water per acre for application as directed broadcast spray when weeds are small. For band applications, mix 2.3 pints in 40 gallons of water per acre, then apply 1 gallon of the diluted spray for each 1-inch band width to be treated of Cotton grown on 40-inch row spacing. Direct the spray solution to the base of the Cotton plant. Nozzles should be placed so as to avoid spraying the Cotton foliage, but to give good coverage of the weeds. If regrowth occurs, make a second application about 1 to 3 weeks after the first. Make directed applications only when Cotton is 3 inches high to first bloom. Do not apply after first bloom. Do not feed foliage to livestock or graze treated areas.

GOLF COURSES AND SOD FARMS

Mow turfgrass to a height of 1 to 1.5 inches before treatment. Mix 0.9 fluid ounce (1.8 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 0.9 to 1.8 fluid ounces (1.8 to 3.6 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.

HIGHWAY RIGHTS-OF-WAY

This product is useful for controlling weeds listed under "USE INFORMATION" section and similar other weeds on rights-of-way. Mix this product at a rate of 2.2 to 5.4 pints per 40 to 50 gallons of water per acre. Use higher rates and spray volume for dense weed growth. For small areas, use 0.9 to 1.8 fluid ounces in 5 gallons per 1,000 square feet. Spray undesirable vegetation thoroughly to point of runoff. Adequate coverage and complete wetting of foliage is important for effective control. 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.

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 soap and water to remove remaining pesticide.
4. Follow washing with clean water rinse.
5. Place a leaking container in a plastic tub and transfer container, 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.

(Continued)

STORAGE AND DISPOSAL (Cont'd.)

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 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 procedure two more times.

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.