

19713-550

03/18/2010

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

MAR 18 2010

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Luz Chan  
Drexel Chemical Company  
1700 Channel Ave, P.O. Box 13327  
Memphis, TN 38113-0327

Subject: MSMA 120  
EPA Registration Number 19713-550  
Application dated August 27, 2009  
Transferred from Notification to Label Amendment on November 23, 2009

Dear Ms. Chan:

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

- 1) Add an appropriate EPA Establishment Number to the label
- 2) Add appropriate Net Contents information to the label
- 3) Revise "for use in cotton...." To "for postemergent use in cotton....." on page 1 in the section USE INFORMATION
- 4) Revise "they should be observed" to "they must be observed" on page 2
- 5) Revise "should" to "must" in the sections Boom Length, Temperature Inversions, Wind and Sensitive Areas on page 2
- 6) On page 3, revise "Use higher rates..." to "Use higher specified rates...." In the section HIGHWAY RIGHTS-OF-WAY

Submit one (1) copy of final printed labeling 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. If you have any questions, please contact Hope Johnson at 703-305-5410.

Sincerely,

A handwritten signature in black ink, appearing to read "Hope Johnson" with a large flourish at the end.

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

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ACCEPTED  
with COMMENTS  
in EPA Letter Dated

MAR 18 2010

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

For selective postemergent weed control on Cotton, Golf courses and Sod farms, and Highway Rights-of-way.

**ACTIVE INGREDIENT:**

Monosodium acid methanearsonate .....	52.8%
<b>OTHER INGREDIENTS:</b> .....	<u>47.2%</u>
<b>TOTAL:</b> .....	<u>100.0%</u>

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

EPA Reg. No. 19713-550

EPA Est. No. 19713-XX-XXX

Net Content:

FIRST AID
<p><b>IF SWALLOWED:</b></p> <ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious or convulsing person.</li> </ul>
<p><b>IF IN EYES:</b></p> <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p><b>IF ON SKIN OR CLOTHING:</b></p> <ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>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.</p>

**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.)**

**All mixers, loaders, applicators, 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.

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)].

**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
<i>Bracharia</i> spp.	Foxtail	Puncturevine
Broomsedge	(green and yellow)	Ragweed
Chickweed	Goosegrass	Sandbur
Cocklebur*	Guineagrass	Watergrass
	Johnsongrass	Wood sorrell

\*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.

**SPRAY DRIFT MANAGEMENT**

Avoiding spray at the application site is the responsibility of the applicator. The interaction of many equipment- and weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outermost nozzles on the boom must not exceed three-fourths the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the **Aerial Drift Reduction Advisory Information** section below.

**AERIAL DRIFT REDUCTION ADVISORY INFORMATION**

**Information on Droplet Size**

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see **Wind, Temperature and Humidity**, and **Temperature Inversions**).

**Controlling Droplet Size**

- Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types, lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- Number of nozzles - Use the minimum number of nozzles that provide uniform coverage.

- Nozzle Orientation - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce larger droplets than other nozzle types.

**Boom Length**

For some use patterns, reducing the effective boom length to less than three-fourths of the wingspan or rotor length may further reduce drift without reducing swath width.

**Application Height**

Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

**Swath Adjustment**

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc).

**Wind**

Drift potential is lowest between speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential.

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

**Temperature and Humidity**

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

**Temperature Inversions**

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

**Sensitive Areas**

This pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive area).

**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 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.

**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 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:

- Contain spill. Absorb with an inert material such as sand or sawdust.
- Collect and place in suitable containers for disposal.
- Wash area with soap and water to remove remaining pesticide.
- Follow washing with clean water rinse.
- Place a leaking container in a plastic tub and transfer container, as soon as possible, to an empty, original container.
- Do not allow runoff to enter sewer or contaminate water supplies.
- 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.

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### STORAGE AND DISPOSAL (Cont.)

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. Triple rinse as follows: 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 pesticide 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.