

Oct 31 1995

E. M. Bellet, Ph.D.
Consultant / Luxembourg-Pamol, Inc.
5100 Poplar Avenue, Suite 2746
Memphis, TN 38137

Gentlemen:

Subject: Revised Labeling
Target MSMA 6.6
EPA Registration No. 42519-1
Target MSMA 6 Plus
EPA Registration No. 42519-3
Cacodylate 3.25
EPA Registration No. 42519-4
DSMA 63P
EPA Registration No. 42519-6
Leaf-All
EPA Registration No. 42519-10
Your Submission Dated October 1, 1994.

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- Update the Environmental Hazards "Do not contaminate water ... " statements to read:

Do not contaminate water by disposal of equipment washwaters.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

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Cynthia Giles-Parker
Product Manager (22)
Fungicide Herbicide Branch
Registration Division (7505C)

Enclosure

LUXEMBOURG-PAMOL
Target MSMA 6.6
MSMA Liquid
For Selective Postemergent Weed Control

Effective 9/8/94

ACTIVE INGREDIENT:

Monosodium Acid Methanearsonate* 51.00%

INERT INGREDIENTS: 49.00%

TOTAL: 100.00%

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 IN EYES: Immediately flush eyes with plenty of water and get medical attention.

IF ON SKIN: Immediately wash skin with soap and plenty of water. If irritation develops, seek medical attention.

IF INHALED: Remove victim to fresh air.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No.: 42519-1

EPA Est. No.: 42519-IS-1

Company	Manufactured for:
Logo	LUXEMBOURG-PAMOL, INC.
	5100 Poplar Avenue, Suite 2746
	Memphis, Tennessee 38137, U.S.A.

**FOR CHEMICAL SPILL, LEAK,
FIRE OR EXPOSURE CALL TOLL
FREE: 1-800-424-9300**

**AGRICULTURAL CHEMICAL
DO NOT SHIP OR STORE WITH
FOODS, FEEDS, DRUGS, OR
CLOTHING**

ACCEPTED
with COMMENTS
b. EPA Letter Dated:

JAN 31 1995

42519-1

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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

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 spray drift. Only protected handlers may be in the area during application.

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 in 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. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during restricted entry interval (REI) of 12 hours.

PPE 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, soil, or water is:

- * coveralls
 - * waterproof gloves
 - * shoes and socks
 - * protective eyewear
 - * chemical resistant headgear for overhead exposure
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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 WPS applies when this product is used to produce agricultural plants on farms, nurseries, or greenhouses.

Keep children and domestic animals off treated areas until this material has been washed into the soil.

The area being treated must be vacated by unprotected persons.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not store this product near fertilizers, seeds, insecticides, or fungicides. Do not store near heat or open flame. Freezing point of this product is approximately -5°F. If stored below freezing point, warm to 50°F and agitate thoroughly before using. Containers should not be stacked more than six (6) high. Reclose all partially used containers by thoroughly tightening screw cap. Damaged or leaking containers which cannot be used immediately should be transferred to suitable sound containers and properly marked. Absorb any spills with a suitable clay absorbent and dispose of as indicated under "Pesticide Disposal". For safety and prevention of unauthorized use, all pesticides should be stored in locked facilities.

To prevent accidental misuse, different pesticides should be stored in separate areas with enough distance between to provide clear identification.

Opened, partially used pesticides should be stored in original labeled containers when possible. When transfer to another container is necessary because of leakage or damage, carefully mark, and identify contents of the new container.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent), adding rinsate to spray tank. 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.

PRECAUTIONARY STATEMENTS

CAUTION:

Hazards to Humans and Domestic Animals

Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes, and clothing. In cases of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation occurs.

Personal Protective Equipment

Applicators and other handlers must wear:

- * Long sleeved shirt and long pants
- * Waterproof gloves
- * Shoes and socks
- * Protective eyewear
- * Chemical resistant apron when cleaning equipment, mixing or loading
- * For exposure in enclosed areas a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval prefix TC-23-C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).
- * For exposure outdoors a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C).

Follow manufacturers 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

User should:

- * Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
 - * Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
 - * 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.
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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 by cleaning of equipment or disposal of wastes. Do not contaminate waters used by animals, wildlife, or aquatic life, or water used for domestic or irrigation purposes. Do not apply when weather conditions favor drift from target area.

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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 (cleared for application to growing crops) 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 2½ pints per acre.

Add 6 pints of MSMA 6.6 Herbicide and 1 to 2 quarts of a suitable surfactant (cleared for application to growing crops) 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 per inch of band with MSMA 6.6 Herbicide 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 cotton leaf may occasionally occur following the recommended treatment; however cotton plants 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 ditchbanks, fence rows, rights of way, storage yards, and similar non-crop areas.

Mix MSMA 6.6 Herbicide at a rate of 3 to 6 pints, 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

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equipment that gives good coverage may be used. If regrowth occurs, reapply as required.

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 to 1 to 1½ inches high before treatment. Mix 1 fluid ounce (2 tablespoons) of MSMA 6.6 Herbicide and ½ 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.

WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, an 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 Luxembourg-Pamol, Inc. or the Seller be liable for consequential, special, or indirect damages resulting from the use 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 Luxmebourg-Pamol, Inc. and is accepted as such by the Buyer.

NET CONTENTS:

Manufactured by Luxembourg Industries (PAMOL), Ltd.
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