

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JAN 30 2004

Mr. Mike Kellog  
Pyxis Regulatory Consulting, Inc.  
11324 17th Ave. Ct. NW  
Gig Harbor, WA 98332

Subject: Herb-All  
EPA Registration No. 42519-9  
Revised labeling submitted October 30, 2003

Dear Mr. Kellog:

The amended labeling referred to above is acceptable. This labeling supercedes all previously accepted labeling for this product (except supplemental labeling). A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, you may call Tobi Colvin-Snyder at 703-305-7801.

Sincerely,

*Tobi Colvin-Snyder, for*

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

JAN 30 2004  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

42519-9

**LUXEMBOURG-PAMOL  
HERB-ALL**

MSMA, Sodium Cacodylate and Cacodylic Acid Liquid Plus Surfactant for General Post-Emergent Weed Control on Drainage Ditchbanks, Fence Rows, Rights-of-Way, Storage Yards, Utility Lines, Pipe Lines, Around Power Plants and Buildings, and Similar Non-Crop Areas.

**ACTIVE INGREDIENTS:**

Monosodium Acid Methanearsonate	26.0%
Sodium Cacodylate	10.5%
Dimethylarsenic Acid (Cacodylic Acid)	1.8%
<b>OTHER INGREDIENTS:</b>	<u>61.7%</u>
<b>TOTAL:</b>	<b>100.0%</b>

Total Arsenic (as elemental) all in water-soluble form 17.9%  
Product contains 3.00 lbs. MSMA and 1.25 lbs Cacodylic Acid equivalent per gallon.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

<b>FIRST AID</b>	
<b>If swallowed:</b>	<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>• <u>Do not give anything by mouth to an unconscious person.</u></li></ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 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>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical information.	

**SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.**

EPA Reg. No.: 42519-9  
EPA Est. No.: 42519-ISR-1

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Company **Manufactured for:**  
Logo **LUXEMBOURG-PAMOL, INC.**  
\_\_\_\_\_  
**5100 Poplar Avenue, Suite 2700**  
**Memphis, Tennessee 38137, U.S.A.**

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

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

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

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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, forests, 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.

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#### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** 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.

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 [Agricultural Use Containers]:** 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.

**CONTAINER DISPOSAL [Homeowner Use Containers]:**

**If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

**If partly filled:** Your local government may forbid pesticides in their landfills. Therefore, call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**CAUTION**

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**

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

**Applicators and other handlers must wear:**

- Long sleeved shirt and long pants
- Chemical-resistant gloves Category A, such as butyl rubber ≥ 14 mils, or natural rubber ≥ 14 mils, or neoprene rubber ≥ 14 mils or nitrile rubber ≥ 14 mils
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant apron when cleaning equipment, mixing or loading

Follow the 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**

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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, or 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 equipment washwaters. 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.

### **GENERAL INFORMATION**

HERB-ALL is a special formulation of herbicides in combination with a surface-active (wetting) agent, for general post-emergent weed control. It is unnecessary to add any other surfactant to the spray solution. This product is effective on both broadleaf weeds and grasses. The phytotoxic properties of these materials are quickly inactivated on contact with the soil. Best results are obtained on young actively growing weeds at air temperatures above 70°F.

HERB-ALL applied properly will kill or control noxious weeds susceptible to MSMA and Cacodylic Acid such as bindweed (morningglory), common plantain, common ragweed, crabgrass (smooth and large), dallisgrass, foxtail (green and yellow), johnsongrass, lambsquarters, morningglory, nutsedge, pigweed, prostrate spurge, puncturevine, sandbur, wild mustard, wild oats.

### **MIXING INSTRUCTIONS**

HERB-ALL although completely water-soluble, must be thoroughly mixed. Fill the spray equipment reservoir about half full with water and add the required amount of herbicide with agitation. Finish filling the reservoir with water, agitate, then apply. After use, clean equipment thoroughly by flushing with water. Do not store spray solution in tank for a prolonged period. Although HERB-ALL is only moderately corrosive, do not use in galvanized or aluminum equipment.

### **APPLICATIONS:**

#### **NON-CROP USE**

HERB-ALL is useful for control of emerged weeds and grasses such as those listed under GENERAL INFORMATION and many similar weeds on drainage ditchbanks, fence rows, right-of-ways, storage yards, along highways, utility lines, pipe lines, around power plants and buildings, and similar non-crop areas. Applications should be made when weeds are small and conditions are favorable for good weed growth.

Mix HERB-ALL at a rate of 1 to 2 gallons per acre in sufficient water to give full coverage. Ground application normally requires 40 to 100 gallons of spray solution per acre. Use spray equipment that

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gives good low volume coverage. If regrowth occurs, reapply as required.

**BINDWEED (MORNINGGLORY) CONTROL:** Use 1½ to 2 gallons of HERB-ALL in 50 to 100 gallons of water per acre. Make first application at first bloom wetting foliage to just short of run-off. Repeat application as needed for top-kill, but limit to 3 applications per year.

**WARRANTY - CONDITION OF SALE**

OUR RECOMMENDATIONS FOR USE of this product are based upon field use and 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. 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 Luxembourg-Pamol, Inc. and is accepted as such by the Buyer.

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NET CONTENTS:

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Manufactured by Luxembourg Industries (PAMOL), Ltd.  
Made In Israel