



APC Holdings
KMG-Bernuth, Inc.
Luxembourg-Pamol, Inc.

July 27, 2006

Our Ref.: MAATF/060727-362
Via E-Mail and Hand Delivery

Lance Wormell
U.S. Environmental Protection Agency
Office of Pesticide Programs (7508P)
Special Review & Reregistration Division, RB2
2777 S. Crystal Drive
Arlington, VA 22202-4501

Re: Proposed Master Labels for MSMA and DSMA

Dear Mr. Wormell,

Following our July 11 meeting, the Methanearsonic Acid (MAA) Research Task Force, is submitting proposed master labels for monosodium methane arsonate (MSMA), disodium methane arsonate (DSMA) and calcium acid methanearsonate (CAMA), in which lower rates were inserted, where possible, based on the existing labels. Each label is accompanied by a summary page listing (1) standard label sections that proposed to be changed and are included in the attached documents, (2) standard label sections that are not proposed to be changed and thus are not included in the attached, and (3) the specific proposed changes from the existing registered labels.

Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink, reading "M. Eldan".

Michal Eldan, Ph.D., Chair,
Tel. (212) 495-9717
Email: meldan@luxpam.com

Enclosures

CC (via email only): Margaret Rice
Dirk Helder
Robert Perlis
Gautam Srinivasan
Lynn Bergeson
MAA Research Task Force members

MAA RESEARCH TASK FORCE

■ P.O. Box 33856, Washington D.C. 20033-0856, PHONE: (800) 890-3301, FAX: (202) 557-3836, E-mail: meldan@luxpam.com ■



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MASTER LABEL FOR RE-REGISTRATION OF MSMA (SUPPORTED BY MAA TASK FORCE)

The Master Label is based on data submitted for re-registration of MSMA.

The Master Label includes:

- Use patterns
- Type and timing of application; Application limitations
- Maximum application rate
- Maximum number of application per crop
- Pre-grazing interval

The Master Label does not include:

- Ingredient statements
- Precautionary statements
- Environmental hazards
- Worker Protection Standard information
- Restricted Entry Interval (REI)
- Comprehensive directions for use
- Storage and disposal statements

Differences from present labels:

- The restriction "Do not make more than 2 applications total of either DSMA or MSMA or a combination per crop." was added to Directed Application – Band application on Cotton.
- Application to grass grown for seed (Pacific Northwest only) was added.
- The restriction under Lawn and Ornamental Turf, "Do not apply with hose-end applicators." was removed.
- Application to sod farms was added.
- The restriction "Do not make more than 4 applications total of either DSMA or MSMA or a combination per year." was added to Lawn, Ornamental Turf and Sod Farms.
- Application on lawn and turf is limited to one broadcast application per year with all other applications being spot treatments, except in Florida where all applications are limited to spot treatment only.
- Citrus (bearing) is no longer a supported use.
- Pre-harvest interval (PHI) was added to Orchards, nonbearing.
- The restriction "Do not make more than 3 applications total of either DSMA or MSMA or a combination per crop." was added to Non-bearing Orchards and Vineyards.
- Maximum number of application and spraying interval for Non-crop areas were added.
- The restriction "Do not make more than 4 applications total of either DSMA or MSMA or a combination per year." was added to Non-Crop Areas.

MSMA Master Label Page 1 of 4

July 27, 2006

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COTTON

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Crop	Use Precautions and Restrictions
Pre-plant or Post-plant (up to cracking) By Ground or Air	2.0	1	Do not apply no later than initial cracking of soil.
Post-emergent (as over-the-top broadcast spray) OR Post-emergent (as over-the-top broadcast spray) By Ground or Air	2.0	1	Apply when Cotton is 3 to 6 inches high or up to early first square stage as salvage operation only.
	1.0	2	Do not make more than two applications total of either DSMA or MSMA or a combination per crop.
Post-emergent (directed spray application) By Ground	2.0	2	Do not apply after first bloom. In Florida, confine application to band treatment. Do not graze treated areas or feed treated foliage to livestock. Do not make more than two applications total of either DSMA or MSMA or a combination per crop.

GRASS GROWN FOR SEED (PACIFIC NORTHWEST ONLY) (Bluegrass, Fescue and Ryegrass)

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Crop	Use Precautions and Restrictions
Broadcast	6.16	1	Do not apply after boot stage. Do not graze treated crop or allow hay, seeds or seed screenings from treated crops to be used for food or feed.

LAWN, ORNAMENTAL TURF, AND SOD FARMS

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
On Athletic field, Golf course, Parks By Ground	2.6	4	Apply at 10 to 14 day intervals. On new lawns, do not treat until after three mowings.
On well established actively growing Turf By Ground	2.0		Do not apply to St. Augustine grass except for commercial sod production. Do not apply to Carpetgrass, Centipedegrass or to Dichondra.
On established Bermudagrass and Zoysiagrass By Ground	4.0		Do not reseed until two weeks after the last application. Use on Golf Course Greens is prohibited. On sod farms, make last application approximately 4 to 5 weeks prior to lifting the sod for harvest to allow full recovery before lifting.
On Sod Farms By Ground	4.0		Do not make more than 4 applications total of either DSMA or MSMA or a combination per year. Do not make more than one broadcast application per year, and all additional applications are to be spot treatment only. In Florida all applications – spot treatment only.

NON-BEARING ORCHARDS (Almonds, Apples, Apricots, Cherries, Citrus Peaches, Pears, Plums, Prunes and Walnut) AND VINEYARDS

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Crop	Use Precautions and Restrictions
Directed application By Ground	4	3	<p>Apply at 10 to 14 day intervals.</p> <p>Do not make more than 3 applications total of either DSMA or MSMA or a combination per crop.</p> <p>Do not apply around trees or vines from which fruit will be harvested within 1 year of treatment.</p> <p>In Florida, apply as spot treatment only.</p>

NON-CROP AREAS

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
On Drainage ditch banks, Right-of-ways, Storage yards and similar non-crop areas By Ground	4.5	4	<p>Apply at 10 to 14 day intervals.</p> <p>Do not make more than 4 applications total of either DSMA or MSMA or a combination per year.</p> <p>Do not contaminate waters used for domestic purposes, or by animals, including wildlife and aquatic life, or water used for irrigation.</p>



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**MASTER LABEL FOR RE-REGISTRATION OF DSMA
(SUPPORTED BY THE MAA RESEACH TASK FORCE)**

The Master Label is based on data submitted for re-registration of DSMA.

The Master Label includes:

- Use patterns
- Type and timing of application; Application limitations
- Maximum application rate
- Maximum number of application per crop
- Pre-grazing interval

The Master Label does not include:

- Ingredient statements
- Precautionary statements
- Environmental hazards
- Worker Protection Standard information
- Restricted Entry Interval (REI)
- Comprehensive directions for use
- Storage and disposal statements

Differences from present labels:

- The restriction "Do not make more than 2 applications total of either DSMA or MSMA or a combination per crop." was added to Directed Application – Broadcast and Directed Application – Band application on Cotton.
- Application to grass grown for seed (Pacific Northwest only) was added.
- Application to sod farms was added.
- The restriction "Do not make more than 4 applications total of either DSMA or MSMA or a combination per year." was added to Lawn, Ornamental Turf and Sod Farms.
- Use in Florida as spot treatment only will be allowed in Non-bearing Orchards
- The restriction under Lawn and Ornamental Turf, "Do not apply with hose-end applicators." was removed.
- The restriction, "Use on Golf Course greens is prohibited." was added.
- Application on lawn and turf is limited to one broadcast application per year with all other applications being spot treatments, except in Florida where all applications are limited to spot treatment only.
- Maximum number of application for Lawn and Ornamental Turf was added.
- Citrus (bearing) is no longer a supported use
- The restriction "Do not make more than 3 applications total of either DSMA or MSMA or a combination per crop." was added to Non-bearing Orchards and Vineyards.
- Maximum number of application and spraying interval for Non-crop areas were added.
- Maximum application rate per 40 gallons of water was changed to maximum application rate per acre for Non-Crop Areas.
- The restriction "Do not make more than 4 applications total of either DSMA or MSMA or a combination per year." was added to Non-Crop Areas.

DSMA Master Label Page 1 of 4

July 27, 2006

MAA RESEARCH TASK FORCE

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PROPOSED DSMA MASTER LABEL

COTTON

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
Pre-plant or post-plant up to cracking By Ground or Air	3.6 lbs. DSMA*6H ₂ O/acre (2.3 lbs. DSMA/acre)	1	Apply no later than initial soil cracking before cotton emerge. Do not feed treated forage to livestock or graze treated areas.
Post-emergent over-the-top By Ground or Air	3.6 lbs. DSMA*6H ₂ O/acre (2.3 lbs. DSMA/acre)	1	Apply only when cotton has 1 – 2 true leaves to first square. Do not feed treated forage to livestock or graze treated areas.
Directed Application: Broadcast	3.6 lbs. DSMA*6H ₂ O/acre (2.3 lbs. DSMA/acre)	2	Apply when cotton is 3 inches high to first bloom. Do not apply after first bloom. Second application should be timed 1 to 3 weeks after the first if needed. Do not make more than 2 applications total of either DSMA or MSMA or a combination per crop. Do not feed treated forage to livestock or graze treated areas.
Directed Application: Band application	For band application in 40" rows per inch of band width: 0.09 lbs. DSMA*6H ₂ O/acre (0.06 lbs. DSMA/acre)	2	Apply when cotton is 3 inches high to first bloom. Do not apply after first bloom. Second application should be timed 1 to 3 weeks after the first if needed. Do not feed treated forage to livestock or graze treated areas. Do not make more than two applications total of either DSMA or MSMA or a combination per crop.

* Including uses of other products containing MAA

GRASS GROWN FOR SEED (PACIFIC NORTHWEST ONLY)
(Bluegrass, Fescue and Ryegrass)

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
Broadcast	11.0 lbs. DSMA*6H ₂ O/acre (6.9 lbs. DSMA/acre)	1	Do not apply after boot stage. Do not graze treated crop or allow hay, seeds or seed screenings from treated crops to be used for food or feed.

* Including uses of other products containing MAA

LAWN, ORNAMENTAL TURF, AND SOD FARMS

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
By ground	3.9 lbs. DSMA*6H ₂ O/acre (2.5 lbs. DSMA/acre)	4	Do not use on St. Augustine (except for commercial sod production), Centipede, Carpetgrass or Dichondra. On sod farms, make last application approximately 4 to 5 weeks prior to lifting the sod for harvest to allow full recovery before lifting. Do not make more than 4 applications total of either DSMA or MSMA or a combination per year. Apply at 14 day intervals. Use on Golf Course greens is prohibited. Do not make more than one broadcast application per year, and all additional applications are to be spot treatment only. In Florida all applications – spot treatment only.

* Including uses of other products containing MAA

NON-BEARING ORCHARDS (Almonds, Apples, Apricots, Cherries, Citrus, Peaches, Pears, Plums, Prunes, Walnut) AND VINEYARDS

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
Directed application	6.3 lbs. DSMA*6H ₂ O/acre (4.0 lbs. DSMA/acre)	3	Do not make more than 3 applications total of either DSMA or MSMA or a combination per crop. Apply as spot treatment only in Florida. Do not apply around trees or vines from which fruit will be harvested within 1 year of treatment.

* Including uses of other products containing MAA

NON-CROP AREAS

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
Ground application	3.6 lbs. DSMA*6H ₂ O/acre (2.2 lbs. DSMA/acre)	4	Do not make more than 4 applications total of either DSMA or MSMA or a combination per year. Apply at 10 to 14 days interval. Do not contaminate water used for domestic purposes, by animals (including wildlife and aquatic life) or for irrigation purposes.

* Including uses of other products containing MAA



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**MASTER LABEL FOR RE-REGISTRATION OF
CALCIUM ACID METHANEARSONATE (CAMA)
(SUPPORTED BY MAA TASK FORCE)**

The Master Label is based on data submitted for re-registration of Calcium acid methanearsonate (CAMA).

The Master Label includes:

- Use patterns
- Type and timing of application; Application limitations
- Maximum application rate
- Maximum number of application per crop
- Pre-grazing interval

The Master Label does not include:

- Ingredient statements
- Precautionary statements
- Environmental hazards
- Worker Protection Standard information
- Restricted Entry Interval (REI)
- Comprehensive directions for use
- Storage and disposal statements

Differences from present labels:

- The restriction “Do not apply with hose-end applicators.” was lifted (from EPA Reg. No. 19713-533 label).

July 27, 2006

CAMA Master Label Page 1 of 2

MAA RESEARCH TASK FORCE

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PROPOSED CAMA MASTER LABEL

LAWN AND ORNAMENTAL TURF

Type of Application	Maximum Application Rate (lbs. a.i./A)	Maximum Number of Application per Year	Use Precautions and Restrictions
On Bentgrass	1.25 lbs. CAMA (1.1 lbs. MAA/A)	Do not exceed 3.5 lbs CAMA/A Per year	Do not use on St. Augustine, Bahia, Centipede or Carpetgrass. Do not use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes. Do not use on grass grown for seed. Do not use on or around fruits, vegetables, flowers or other ornamental plants. Do not allow livestock to graze on treated areas. Do not use drainage water from turf treated with this product for crop irrigation.
On Grasses other than Bent	3.3 lbs. CAMA (2.1 lbs. MAA/A)		
On Bermuda and Zoysia to control Nut sedge	3.5 lbs. CAMA (2.1 lbs. MAA/A)		Do not make more than one broadcast application per year, and all additional applications are to be spot treatment only. In Florida all applications – spot treatment only.

* Including uses of other products containing MAA