

19713-18

8/27/2009

10f7



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Luz G. Chan
Registration Manager
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113

AUG 27 2009

Subject: Label Notifications for Pesticide Registration Notice 2007-4

Dear Ms. Chan,

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated March 20, 2009 and your label resubmissions sent August 19, 2009 for the following products:

Drexel Antak	(EPA Registration Number 19713-18)
Drexel Leven-38®	(EPA Registration Number 19713-105)
Drexel Simazat™ 4L	(EPA Registration Number 19713-171)

The Registration Division (RD) has conducted its review of these requests for their applicability under PRN 2007-4 and finds that the label changes requested fall within the scope of PRN 2007-4. The labels submitted with the applications have been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please call me directly at 703-305-6249 or Steve Schaible of my staff at 703-308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor-Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

2097

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-18	2. EPA Product Manager TONY KISH	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL ANTAK	PM# 22/Fungicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company, P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>NOTIFICATION</u> Product Name <u>AUG 27 2009</u>	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label (18SP-0309*) per PR Notice 2007-4. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes" Package wgt 15 lbs.		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		No. per container	No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5, 10, 15, 30, 55 gal; Bulk, Tote		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Luza Chan</i>	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date March 11, 2009	



Drexel Chemical Company

March 11, 2009

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

**Re: Submission of Revised Label per PR Notice 2007-4
DREXEL ANTAK (EPA Reg. No. 19713-18)**

Herewith:

- 1. Completed EPA Form 8570-1
- 2. One copy of the label (18SP-0309*) with a revised storage and disposal statements adopted exactly from Appendix A, Appendix B and Appendix C of PR Notice 2007-4.

The changes were highlighted for easy reference.

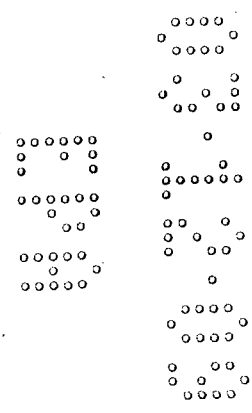
3. Certification Statements

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz G Chan
Luz G Chan
Registration Manager





Drexel Chemical Company

March 11, 2009

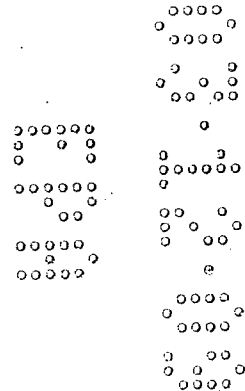
Submission of Revised Label per PR Notice 2007-4
DREXEL ANTAK (EPA Reg. No. 19713-18)

This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA Regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, and 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

FOR DREXEL CHEMICAL COMPANY

LUZ G CHAN

Registration Manager



50 of 7



Antak[®]

Tobacco Sucker Control Agent

ACTIVE INGREDIENT:

n-Decanol (Fatty alcohol C₁₀-100%) 79.0%

OTHER INGREDIENTS: 21.0%

TOTAL: 100.0%

This product contains 5.72 pounds of active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See **FIRST AID** Below
SHAKE WELL BEFORE USING

EPA Reg. No. 19713-18

EPA Est. No. 19713-GA-001 Net Contents: _____

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.
- Avoid alcohol.

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.

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 or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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 made of any waterproof material such as polyethylene or polyvinyl chloride, and shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If
(Continued)

PRECAUTIONARY STATEMENTS (Continued)

no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-5)], the handler PPE requirements may be reduced or modified as specified in the WPS.

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing 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 or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes.

GENERAL INFORMATION

ANTAK is a carefully balanced combination of active ingredients and wetting agents (surfactants) to be used for the control of sucker growth on all types of Tobacco. The concentrated product is diluted with water to form a creamy emulsion which is applied as a coarse spray. The emulsion is effective only when it comes in direct contact with suckers; therefore, the spray should wet the sides of the Tobacco stalk and contact all small, immature suckers. Because this product is a contact-type agent, it is necessary to straighten any plants that are leaning so that the emulsion flows down the stalk evenly and contacts each sucker. This material can be applied alone or may be followed by a systemic sucker control agent in a dual treatment program.

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



Manufactured By:
Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972

6007

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 in this labeling about personal protective equipment (PPE) and restricted entry intervals (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 24 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 over short-sleeved shirt and short pants, chemical-resistant gloves made of any waterproof material, chemical-resistant footwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure.

TIME OF APPLICATION

Top Tobacco plants at the late button to early flower stage and remove any suckers which have grown over one inch. Because this product is a contact-type agent, it is necessary to straighten any plants that are leaning so that the emulsion flows down the stalk evenly and contacts each sucker.

The Tobacco plants should be sprayed within two days after topping and removal of suckers. This product can be applied any time during the day until about 7:30 p.m.; however, best results are obtained when plants are sprayed in the morning after the dew has dried or in the afternoon when the plants have recovered from wilt. Some injury to the tender leaves at the top of the plant may result from application of this product under bright sunlight at temperatures above 90°F. Injury may also result if this product is applied to the underside of the Tobacco leaf; thus, application in winds high enough to turn over the top leaves is not recommended. Do not apply during rain or to wet plants; however, if the material has been on the plants over an hour before being washed off by rain, reapplication should not be necessary.

RATE OF APPLICATION

Flue-cured Tobacco: This product should be diluted at the rate of 1.5 gallons of this product in 48.5 gallons of water to total 50 gallons of spray solution per acre (6000 plants/A).

Air-cured Tobacco (Burley, Cigar and Maryland): This product should be diluted at the rate of 5 fluid ounces in 1 gallon of water or 1.5 to 2 gallons of this product in 48 gallons of water to total 50 gallons of spray solution.

Dark Tobacco: This product should be diluted at the rate of 7 to 8 fluid ounces in one gallon of water or 2.75 gallons of this product in 47.25 gallons of water to total 50 gallons of spray solution.

Note: When applied by hand, 1 gallon of this diluted product will treat 130 to 190 Tobacco plants. If a power sprayer is used, 40 to 60 gallons of diluted product should be applied per acre of Tobacco.

MIXING INSTRUCTIONS

The diluted emulsion is most easily prepared by adding the required amount of this product to your spray tank and then adding the water. In order to obtain the best results, IT IS IMPORTANT THAT THE WATER BE ADDED TO THIS PRODUCT RATHER THAN THIS PRODUCT TO THE WATER.

APPLICATION EQUIPMENT

When applied with a hand-held or backpack sprayer: The diluted emulsion should be applied at the rate of 0.66 to 1 ounce of spray solution per plant (or enough to ensure rundown to the bottom of the plant). A coarse spray is recommended, directed downward at the top of the stalk from 6 to 8 inches above the top leaves. Very little tank pressure is required and in no case should more than 20 psi be used. Be sure the solution is thoroughly mixed before application begins and maintain agitation during application.

When applied with power spray equipment: Three nozzles per row should be used (TG-3, TG-5 and TG-3 full cone tips, or equivalent are recommended). One nozzle should be directed downward over the center of the row and the other two should be 9 inches on either side, directed at or slightly above the center of the stalk. This product, diluted, should be applied as a coarse spray from a height of 12 to 16 inches above the top stalk. It is recommended that boom pressure be kept at 20 to 25 psi (never to exceed 30 psi) and operating at a trac-

tor speed of 2.5 to 3 mph; you will apply approximately 50 gallons of diluted emulsion per acre of Tobacco. When a power sprayer is used, be sure the solution is thoroughly mixed before application begins and maintain agitation during application.

Use Precautions: If allowed to stand for extended periods of time, the diluted emulsion may separate. ALWAYS REMEMBER TO MIX WELL IMMEDIATELY BEFORE USING. Be sure the solution is thoroughly mixed before application begins and maintain agitation during application. All sprayers should be equipped with a pressure regulator and a pressure gauge.

Application Notes:

1. Application of this product at concentrations higher than recommended may cause leaf damage.
2. Be sure spray equipment is clean prior to use.
3. After adding this product to the spray tank, start-up and maintain good agitation of the diluted solution.
4. Do not mix this product with other Tobacco chemicals, except as specified in this label (See "TANK MIX APPLICATIONS").
5. Do not apply this product to wet plants, such as immediately after heavy rain or when there is a heavy dew.
6. Do not apply on windy days since the spray solution may not be deposited uniformly on the leaf axils and sucker buds.
7. Do not spray during the middle of the day in very hot weather since leaf burn may occur. Injury may also result if the product is sprayed on the underside of the Tobacco leaf, such as when the wind is strong enough to turn over the top leaves.
8. In order to minimize the possibility of injury to the Tobacco plants, do not mix this product with other chemicals such as insecticides or herbicides or apply this product to plants which have recently been treated with such chemicals.
9. In Burley tobacco, during prolonged periods of high heat and humidity or under other conditions which might favor the spread of Hollow stalk or Stem rot diseases, delay application of this product until these conditions pass.

NUMBER OF APPLICATIONS

In many cases a single application of this product is satisfactory to control both primary and secondary suckers. If secondary sucker growth appears vigorous, a second treatment 3 to 7 days after the initial treatment may be advantageous.

Excellent leaf quality can be obtained with the use of this product alone in one or, where necessary, two applications. Some growers favor a dual treatment using this product first (at the late button stage) followed 1 to 2 weeks later with a systemic sucker control agent (maleic hydrazide) used in accordance with manufacturer's instructions.

ADDITIONAL TREATMENT PROGRAMS

Flue-Cured Tobacco: If sucker growth is vigorous or if the development of the Tobacco in the field is irregular, second and third applications of this product, at 3- to 5-day intervals, may be needed. For these additional applications, use 1.5 gallons of this product in 48.5 gallons of water per acre to total 50 gallons of spray solution. Seven to 10 days after the last application of this product, apply Super Sucker-Stuff®, Sucker-Stuff or Sucker-Stuff 80 WS at the labeled rate and timing.

Air-Cured (Burley, Cigar or Maryland): Application of this product may be followed in 7 to 10 days by Super Sucker-Stuff, Sucker-Stuff or Sucker-Stuff 80 WS at the labeled rate and timing. If a systemic material is not used, a second application of this product may be made 5 to 7 days after the first application.

TANK MIX APPLICATIONS

Flue-Cured Tobacco: A tank mixture of this product plus Super Sucker-Stuff, Sucker-Stuff or Sucker-Stuff 80 WS may be applied to Flue-cured tobacco at the early flower growth stage. This tank mix usually follows application of a contact sucker control agent. Before treatment, the Tobacco should be topped and all suckers over one inch long removed. The spray mixture should be directed to the upper one-third of the plant, and the sprayer should be operated at low pressure similar to that of a contact application. This will ensure that the droplets are large enough for some of the mixture to run down the stalk. Use normal spray precautions, such as those you would use while applying contact control materials.

Notes:

1. One application of the tank mix per growing season.
2. Do not harvest within 7 days of application.
3. All applicable directions, restrictions and precautions are to be followed.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. **PESTICIDE STORAGE:** Storage should be under lock and key in a ventilated room and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Do not stack containers over 2 pallets high. Move containers by handles or case. Do not move containers from one area to another unless they are securely sealed. Keep containers tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original containers only. If the contents are leaking or material is spilled, follow these steps:

1. Contain spill. Absorb with a material such as sawdust, clay granules or dirt.
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 contents, 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: 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:

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 use or 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 this 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 rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

OUR RECOMMENDATIONS 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 allowed by law, buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith. To the extent allowed by 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.