

19713-123

1-21-2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JAN 21 2008

Ms. Luz G. Chan
Registration Manager
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38133-0327

Re: Submission of Final Printed Label per EPA's Letter Dated October 12, 2007
EPA Reg No.: 19713-123
Submission Dated: December 18, 2007

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, December 18, 2007, for the product, Drexel Damoil. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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



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 19713-123	2. EPA Product Manager John Hebert	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL DAMOIL	PM# 7 / IRB	
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. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>10/12/2007</u>
<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.

NOTIFICATION
JAN 21 2008

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

Submission of revised label (123SP-1107Pending1) incorporating EPA's comments dated 10/12/2007.

Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
					Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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 G. Chan</i>	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date December 18, 2007	

3/7
NOTIFICATION

JAN 21 2008



Damoil™

Dormant & Summer Spray Oil

ACTIVE INGREDIENT:

Petroleum oil* 98.0%

OTHER INGREDIENTS: 2.0%

TOTAL: 100.0%

*Petroleum oil Min. Unsulfonated Residue - 92%.
Petroleum oil Classification - Unclassified.

KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below
SHAKE WELL BEFORE USING

EPA Reg. No. 19713-123

EPA Est. No. 19713-TN-001

Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Do not give any liquid to the person.
- 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.

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.
- Call a poison control center or doctor for treatment advice.

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.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further 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.

Note to Physician: Contains petroleum distillate. Do not induce vomiting since vomiting may induce aspiration pneumonia.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid breathing of spray. Do not take internally. Avoid contact with skin and eyes. Causes moderate eye irritation.

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 E on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber or Viton 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.

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

Toxic to fish. For terrestrial uses only. 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 waste.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

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.

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 4 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 such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber or Viton and shoes plus socks.

DAMOIL is an especially refined phytonomic oil contact insecticide.

It is for use on plants in foliage or the dormant stage. This product may be applied in conventional hydraulic sprayers, concentrate application equipment, ground applicators or aerial. The rates are recommended on a per 100 gallons of dilute spray, except where indicated.

MIXING INSTRUCTIONS:

1) Add enough water to mix tank to begin agitation. 2) Add micronutrients and other desired pesticide. If dry pesticide products are used, premix the materials with water thoroughly and add to mix tank. DO NOT add this product before uniform mixture of pesticide and water is obtained. 3) Maintain agitation until the spray is applied. Flush any spray mixture remaining in the hoses back into the tank if the solution stands for more than 20 minutes.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

TANK MIXING:

Tankmix only with products registered for use on the specific crop to be treated. When using this product in combination with other pesticides as directed on this label, observe the most restrictive rates, tankmixing prohibitions, precautionary statements and limitations listed on the product labels involved.

Before tank mixing with other labeled products, check for tankmix compatibility. A jar test prior to tankmixing this product with other pesticides or liquid fertilizer will ensure compatibility. Use a clear glass quart jar with lid and mix the tankmix ingredients in their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately one-half hour. If components of the mixture separate readily, a compatibility agent will be helpful in maintaining the stability of the spray mixture. If the mixture balls-up, forms flakes, sludges, jells, oily films or layers or other precipitates, the components of the mixture are not compatible.

AIR APPLICATION:

Apply the quantity of product indicated in sufficient water to make a minimum of 20 gallons of spray per acre except where indicated otherwise. Air application is recommended only if growing and/or soil conditions indicate a ground application to be unfeasible.

GENERAL INSTRUCTIONS AND USE PRECAUTIONS:

DO NOT USE THIS PRODUCT in combination with or immediately preceding or following applications of chloropropylate, captan, dyrene, dikar, dichlone, folpet, karathane, morestan, morocide, sulfur compounds, propargite and carbaryl.

For foliage application, the spray tank must be free of any sulfur residue before using this product. Do not combine sulfur sprays with this product on foliage and do not follow a previous application of sulfur or apply sulfur following this product until sufficient time has elapsed for safety (at least 30 days) except in the Northwest (OR and WA). In OR and WA, it may be used in combination on Pears as a post-harvest (after all fruit is off the tree), dormant and delayed dormant (before scales slip, or at or prior to bud swell) treatment.

Do not use this product when temperatures are above 90°F. When temperatures drop below 32°F (usually nighttime lows), do not spray trees and vine crops until daytime temperatures have warmed to a point above 32°F and are free from moisture due to melting frost or heavy dews. Application to trees weakened by disease, drought, drying winds or high nitrogen applications may result in oil injury.

USE INSTRUCTIONS:

Dilute this product with water before use.

Amounts given are for 100 gallons of diluted spray solution unless otherwise noted.

ALFALFA Seed Crop Only: Use 1 quart per acre in 20 to 30 gallons of spray solution per acre by ground application or 10 to 15 gallons per acre by air when used in combination and at the recommended label rates with Malathion 5EC (an emulsifiable concentrate containing 5 pounds of malathion per gallon) for control of the pests listed on the label. Spider mites: Use 1 quart per acre at the dilutions noted above.

Use Restriction: Do not apply more than 2 gallons per acre per application by air.

ALMONDS, APRICOTS, CHERRIES, NECTARINES, PEACHES, PLUMS, PRUNES Dormant or Delayed-Dormant: Black scales, Brown apricot scales, European fruit lecaniums, Frosted scales, Italian pear scales, Oleander scales, Olive scales (Parlatoria scales), Parlatoria, Putnam scales, Red spider mites, San Jose scales, Soft brown scales, certain other Scale insects, eggs of Aphids—Apply 1.5 to 2 gallons.

Summer Use: Red spider mites—Apply 3 to 4 quarts. Summer stages of Brown apricot scales, San Jose scales—Apply 1 gallon.

Use Restriction: Do not apply more than 17 gallons per acre per application by ground and 11.7 gallons per acre per application by air during the dormant or delayed-dormant period. During the Summer period, do not apply more than 11.7 gallons per acre by air on Almonds, Apricots, Cherries, and Plums.

APPLES Delayed-Dormant: Rust mites—Apply 1.5 to 2 gallons.

Summer Use: Apply 1 to 1.5 gallons.

Use Restriction: Do not apply more than 228 gallons per acre per application by ground during the delayed-dormant period.

APPLES, PEARS Dormant or Delayed-Dormant: Eggs of Aphids, Italian pear scales, Red spider mites, San Jose scales—Apply 1.5 to 2 gallons.

Summer Use: Red spider mites—Apply 3 to 4 quarts.

Concentrated Sprayers: Pears (CA only)—Apply 4 to 6 gallons in 90 to 120 gallons of spray solution per acre. Summer forms of Italian pear scales and San Jose scales—Apply 1 to 1.5 gallons.

Use Restriction: Do not apply more than 228 gallons per acre on Apples per application by ground during the delayed-dormant period and 11.7 gallons per acre by air per application during the dormant period. On Pears, do not apply more than 2.7 gallons per acre per application during the delayed-dormant period and 228 gallons per acre during the dormant period with ground equipment; do not apply more than 53.5 gallons per acre per application by air during the delayed-dormant period. For Summer use on Pears, do not apply more than 23.4 gallons per 100 gallons per acre using ground equipment.

BANANAS, PLANTAINS: Black leaf streak, Sigatoka (black, yellow); This product will also loosen Sooty mold fungus and prevent its formation by controlling Aphids, Mealybugs, Scale insects and Whiteflies—Apply 0.5 to 1.5 gallons of

this product in 20 to 100 gallons of water per acre. For application by Mist blower, use 1.5 gallons of this product in 6 gallons of water per acre.

Begin application when disease or insect pest first appears and continue every 10 to 15 days during the rainy period or as needed. DO NOT apply when daytime temperatures exceed 80°F (26.6°C) as injury may occur.

Phytotoxicity may be affected by the quantity of oil used, vigor of trees, and temperatures at time of application. Bag fruits or use a directed spray on unbagged fruits to improve crop safety.

Use Restriction: Do not apply more than 1.5 gallons per acre per application using ground equipment.

BLUEBERRIES, BUSHBERRIES, CANEBERRIES: Mites, Powdery mildew, Rust—Apply 0.75 to 1.5 gallons of this product in 100 gallons of water per acre with ground equipment for optimum spray coverage of leaf surfaces. For Fungal Diseases, use at least 200 psi spray pressure.

Use Restriction: Do not apply more than 1.5 gallons per acre per application using ground equipment.

CHRISTMAS TREES: Winter Use—Aphids, Adelgids, Scales (soft and hard), Spider mites: Apply 2 to 4 gallons in a minimum of 200 gallons of water per acre. **Summer Use:** Apply 1 to 3 gallons in a minimum of 200 gallons of water per acre.

Use Restriction: Do not apply more than 0.02 gallons (2.56 fl. ozs.) per gallon of water per application using ground equipment during the Winter period.

FIGS Dormant or Delayed-Dormant: Fig scales—Use 3 gallons of this product.

Use Restriction: Do not apply more than 3 gallons per 100 gallons of water per acre per application using ground equipment during the dormant or delayed-dormant period.

FLOWER AND FOLIAGE PLANTS: Aphids, Adelgids, Bugs (immature), certain Caterpillars, Eriophyid mites, Gall mites, Lace bugs, Leaf beetle larvae, Leafminers, Mealybugs, Psyllids (immature), Sawfly larvae, Scales (immature), Spider mites, Whiteflies (immature). Apply 2 to 3 gallons at Winter/Dormant as needed. Apply 1 to 2 gallons as foliar or cover at Summer as needed.

Use Restriction: Do not apply more than 4.8 gallons per acre by air and 0.038 gallon per gallon of water (3.8 gallons per 100 gallons of water) per application using ground equipment on Woody shrubs and Vines and Shade trees. During the dormant period, do not apply more than 3.2 gallons per acre per application using ground equipment on Herbaceous plants and Woody shrubs and Vines. For non-flowering plants, when needed, do not apply more than 2 gallons per 100 gallons of water per acre using ground equipment.

GRAPES Dormant: Mealybugs—Apply 4 to 6 gallons in 200 to 300 gallons of spray solution per acre.

Use Restriction: Do not apply more than 17.4 gallons per 300 gallons of water per acre per application using ground equipment during the postharvest and dormant periods.

LEMONS, GRAPEFRUIT: Black scales, Purple scales, Red scales, Red spider mites, Yellow scales—Apply 1 to 1.5 gallons of this product, plus Malathion 25 Wettable at the label recommended rate. For best results, spray during Winter and Spring months when Red scales are more easily controlled and trees are generally less reactive to oil sprays. Do not use within 8 weeks of harvest on Lemons.

Use Restriction: For foliar applications on Lemons and Grapefruit, do not apply more than 0.14 gallons per gallon of water (25.3 gallons per 1,800 gallons of water) per application using ground equipment. When needed, do not apply more than 65.2 gallons per acre per application using ground equipment. By air, do not apply more than 30.1 gallons per acre per application. On Grapefruit, do not apply more than 1.5 gallons of this product per acre per application during the late Summer or Fall period.

OLIVES: Black scales, Oleander scales, Parlatoria scales, Spider mites—Apply 1.5 gallons of this product per 100 gallons of spray solution per acre. Apply in pre-bloom or in post-bloom up to buckshot.

Use Restriction: Do not apply more than 21.7 gallons per acre per application using ground equipment during the postharvest and prebloom periods. Do not apply more than 0.02 gallons per gallon of water (2 gallons per 100 gallons of water) per application during the dormant and delayed-dormant periods.

NAVEL ORANGES: Black scales, Purple scales, Red scales, Red spider mites, Yellow scales—Apply 3 quarts of this product, plus Malathion 25 Wettable at the label recommended rate. Do not use on Navel oranges after September 1.

Use Restriction: For foliar applications, do not apply more than 0.14 gallon per gallon of water (25.3 gallons per 1,800 gallons of water) per application using ground equipment. When needed, do not apply more than 65.2 gallons per acre per application using ground equipment. By air, do not apply more than 30.1 gallons per acre per application. Do not apply more than 1.5 gallons per acre per application during the late Summer or Fall period.

VALENCIA ORANGES: Black scales, Purple scales, Red scales, Red spider mites, Yellow scales—Apply 1 gallon not later than September 1; or 3 quarts of this product plus Malathion 25 Wettable at the label recommended rate, applied not later than September 15.

Use Restriction: For foliar applications, do not apply more than 0.14 gallon per gallon of water (25.3 gallons per 1,800 gallons of water) per application using ground equipment. When needed, do not apply more than 65.2 gallons per acre per application using ground equipment. By air, do not apply more than 30.1 gal-

lons per acre per application. Do not apply more than 1.5 gallons per acre per application during the late Summer or Fall period.

PEARS Delayed-Dormant: Pear psyllas—Apply 2 gallons.

Summer Use: Apply 1 to 1.5 gallons.

Blister mites—Delayed-Dormant and Fall Spray—2 gallons.

Use Restriction: Do not apply more than 2.7 gallons per acre per application during the delayed-dormant period and 228 gallons per acre during the dormant period with ground equipment. By air, do not apply more than 53.5 gallons per acre per application during the delayed-dormant period. For Summer use; do not apply more than 23.4 gallons per 100 gallons per acre using ground equipment.

ORNAMENTALS AND SHADE TREES (Apple, Birch, Conifers [See "Plant Restrictions"], Dogwood, Flowering cherry, Flowering peach, Hawthorne, Holly, Magnolia, Maple, Oak, Privet, Pyracantha, Sycamore): Aphids, Adelgids, Black scales, Brown apricot scales, certain Caterpillars, Gall mites, Lace bugs, Leaf beetle larvae, Mealybugs, Plant bugs (immature), Psyllids (immature), Oyster shell scales, Red spider mites and eggs, San Jose scales, Sawfly larvae, Soft brown scales, Whiteflies (immature).

On all varieties when in leaf — Apply 1 gallon per 100 gallons of spray solution per acre.

Dormant Spray on Deciduous Varieties: Apply 2 gallons per 100 gallons of spray solution.

Dormant Spray on Evergreen Varieties: Apply 1 gallon per 100 gallons of spray solution.

Plant Restrictions: Oil removes the glaucous (blue) bloom from such Evergreens as Colorado blue spruce and Koster spruce. Do not spray on Walnut foliage. Always use lower dosage or test spray oil sensitive plants such as *Chamaecyparis*, *Cryptomeria*, Japanese holly, Juniper, Smoke tree and Spruce. Tendency toward sensitivity: Red cedar and Douglas fir. Use with caution and reduced dosage for dormant application on Sugar maple and Red bud. Do not spray when buds have fully opened and shoot elongation is occurring.

Do not use on Conifers or Ferns not tolerant to oil sprays. Keep sprays away from open blooms; bleaching and spotting has been observed with the open blooms of certain plants.

Use Restriction: Do not apply more than 4.8 gallons per acre by air and 0.03 gallon per gallon of water (3.8 gallons per 100 gallons of water) per application using ground equipment on Woody shrubs and Vines and Shade trees, During the dormant period, do not apply more than 3.2 gallons per acre per application using ground equipment on Herbaceous plants and Woody shrubs and Vines. For non-flowering plants, when needed, do not apply more than 2 gallons per 100 gallons of water per acre using ground equipment.

WALNUTS Late Spring to Mid-Summer Only: Summer stages of European fruit scales, Frosted scales, Red spider mites, San Jose and other Soft-shelled scales—Apply 2 to 4 quarts. Do not apply after husk splits.

Use Restriction: Do not apply more than 7.7 gallons per acre per application during the dormant and delayed-dormant period and 0.14 gallon per gallon of water (68.2 gallons per 500 gallons of water) per application during late Spring using ground equipment.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage, disposal and cleaning of equipment.

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 over 2 pallets high. Move containers by handles or 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 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: 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.

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 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.



Drexel Chemical Company

December 18, 2007

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 Label per EPA's Letter dd. 10/12/2007 by Notification
DREXEL DAMOIL (EPA Reg. No. 19713-123)**

Reference is made to the above. Herewith:

1. Completed EPA Form 8570-1
2. One (1) copy of the label (123SP-1107Pending1) with the following changes to incorporate EPA's comments of 10/12/2007:
 - i) The heading 'General Information' was deleted and the section was moved under the 'Directions for Use'. Also, two new headings (i.e. "Tank Mixing" and "General Instructions and Use Precautions") were added and relevant sentences were moved under these headings for clarity.
 - ii) The heading "Use Instructions" was added before the various recommended use sites.
 - iii) Under the various crops, "Use Restriction" was added specifying the maximum allowable rate per acre based on Appendix C (Table C-1) of the August 23, 2006 Reregistration Eligibility Decision (RED) for Aliphatic Solvents.
 - iv) Under the Directions for Use for Citrus, the specific application rate for Malathion was deleted.

I highlighted the changes for easy reference.

3. Required certification statement

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

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