

19713-124

10/24/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OCT 24 2008

Luz Chan
Drexel Chemical Company
1700 Channel Drive
PO Box 13327
Memphis, TN 38113-0327

Subject: Label Amendment and Revised Confidential Statement of Formula
Drexel 2,4-DB Technical
EPA Reg. No. 19713-124

The revised basic Confidential Statement of Formula submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable. The label amendment is also acceptable provided that you make the following changes to the product labeling:

1. Per the Label Review Manual, address of the producer/manufacture should be on the label.
2. Per the Label Review Manual, under Hazards to Humans and Domestic Animals, also include bold text to read "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco **or using the toilet.** "

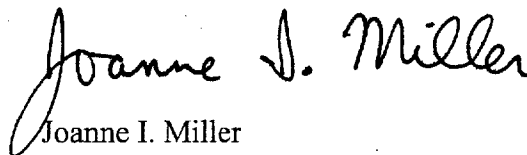
Note: While the Container Disposal language in the Storage and Disposal section of the label submitted for review fulfills current requirements, the registrant should consider updating their labeling to meet the requirements of Pesticide Registration (PR) Notice (PR) 2007-4: Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment". For further information, please refer to EPA Web Site: http://www.epa.gov/PR_Notices/pr2007-4.pdf

Note: Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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One copy of the label stamped "Accepted with Comments" is enclosed for your records. Please submit two copies of the final printed label before the product is released for shipment. If you have any questions, please contact me or Michael Walsh by phone at (703) 308-2972 or via email at walsh.michael@epa.gov.

Sincerely,



Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Enclosure

DREXEL 2,4-DB TECHNICAL

For Use by Commercial Pesticide Formulators. For Manufacturing Purposes Only.

Active Ingredient:

4-(2,4-Dichlorophenoxy)butyric acid..... 98.0%

Other Ingredients: 2.0%

TOTAL:..... 100.0%

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

OCT 24 2008

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

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Net Content: _____

FIRST AID

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 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 person.

If Inhaled:

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

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

For use by Commercial Pesticide Formulators. For manufacturing purposes only. Each formulator is responsible for obtaining EPA registration for its formulated products(s).

Only for formulation into a herbicide for the following:

- 1) Agricultural uses: Alfalfa, peanuts, soybeans, trefoil
Non-crop uses: Conservation reserve program
- 2) For any additional uses(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such uses(s).

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage and disposal. Do not store under conditions which might adversely affect the container or its ability to function properly. Such conditions include, but are not limited to, positioning of the container in storage, storage temperature, potential for crushing or damage due to stacking and penetration of moisture.

PESTICIDE STORAGE: Store in a safe manner. Store in original container only. Store in cool, dry place. Reduce stacking height where local conditions, such as humidity or pallet overhang can affect package strength.

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 and Environmental Control Agency or the hazardous waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY – CONDITIONS OF USE

Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the "DIRECTIONS FOR USE". Manufacturer makes no other warranties, expressed or implied, including fitness of merchantability. 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. The foregoing is a condition of sale and is accepted as such by the Buyer.