

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Luz G. Chan Product Registration Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-9327

JAN 15 2009

SUBJECT:

Application for Pesticide Notification (PRN 98-10)

Request General Label Change EPA Reg. No. 19713-124

Application Dated November 13, 2008

#### Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 11/13/08 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) 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 Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader Registration Division (7505P)

Office of Pesticide Programs

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Please read instructions on	reverse befor	e complet	ing form.		··	Form App	pevore	. OMB N	lo. 2070	D-0060	. Approval expires 2-28-9	
SEPA Environmental Protecti Washington, DC 20					ion Agency			_	Registration Amendment Other		OPP Identifier Number	
			Applicati	on for	Pestici	de - Sect	tion	l				
1. Company/Product Number 19713-124				2. EPA Product Manager JOANNE MILLER						3. Proposed Classification  ✓ None Restricted		
4. Company/Product (Name) DREXEL 2,4-DB TECHNICAL				PM# 23/Herbicide Branch						Nestricted		
5. Name and Address of Applicant (Include ZIP Code)				6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)								
Drexel Chemical Company P.O. Box 13327				(b)(i), my product is similar or the composition and labeling to:								
Memphis, TN 38113-0327				EPA Reg. No								
Check if this is a new address					Product Name							
				Se	ction -							
Amendment - Explain below.  Resubmission in response to Agency letter dated					Final printed labels in repsonse to Agency letter dated "Me Too" Application.					Oct	ober 24, 2008	
Notification - Explain below.						Other - Explain below.						
Submission of final label per Thank you.	EFAS letter 0	1 10/24/20	vo. Details an	e in the c	over letter a	ccompanying	mis su	iomission.				
				Se	ction - I	11	,					
1. Material This Product Wil	Be Package	d In:		<del></del>								
Child-Resistant Packaging	stant Packaging Unit Packaging				er Soluble P	ackaging		2. Type of Container				
Yes				Yes				Metal Plastic				
No	If "Yes"		Al		J No	<b>N</b> 1			4	ass per		
* Certification must be submitted If "Yes" No. per container				If "Y Pack	1101   110					her (Sp	ecify)	
3. Location of Net Contents Information 4. Size(s) Re				etail Container 5. Location of Label Di					irection	S		
6. Manner in Which Label is	Affixed to Pr	oduct	Lithor Paper Stend	graph glued iled		Other	·	<del>-,-,-</del>				
				Sec	ction - l'	V						
1. Contact Point (Complete	items directl	y below fo	or identification	on of ind	ividual to b	e contacted,	if nece	essary, to	proces	s this a	pplication.)	
Name LUZ G CHAN				1					phone 1) 774-4	No. (Include Area Code) 4370		
I certify that the state I acknowledge that an both under applicable	y knowlinglly			all attac					nent or	tes (	S. Date Application দ্যুক্তর্মত্ব (Stamped)	
2. Signature Cuya Chan 2008.11.13 09:55:05 -06'00'				3. Title REGIS	3. Title  REGISTRATION MANAGER					.,7	, , , , , , , , , , , , , , , , , , , ,	
4. Typed Name				5. Date					<del> </del>		ر بر د بر د د برو	
LUZ G CHAN				November 13, 2008								



November 13, 2008

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 Final Label per EPA's Letter dated October 24, 2008 DREXEL 2,4-DB TECHNICAL (EPA Reg. No. 19713-124)

#### Herewith:

- 1. Completed EPA Form 8570-1
- 2. One (1) copy of the label (124SP-1108) incorporating EPA's comments. We, will, however, revise the Storage and Disposal statements per PR Notice 2007-4 on a later date.

Also, we added the statement "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."

I highlighted the changes for easy reference.

3. 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 Registration Manager



November 23, 2008

Submission of Final Label per EPA's Letter dd. October 24, 2008 DREXEL 2,4-DB TECHNICAL (EPA Reg. No. 19713-124)

This notification is consistent with the Provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and 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 terms of PR Notice 98-10 and 40 CFR 152.46, 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



# JAN 1 5 2008

# 2,4-DB Technical

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

#### **ACTIVE INGREDIENT:**

4-(2,4-Dichlorophenoxy)butyric acid				
OTHER INGREDIENTS:				
TOTAL:	100.0%			

## CAUTION

See FIRST AID Below

EPA Reg. No. 19713-124 EPA Est. No. 19713-

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.

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:** 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, using tobacco or using the toilet. 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 dischage effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water 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 product(s).

Only for formulation into a herbicide for the following:

- Agricultural uses: Alfalfa, peanuts, soybeans, trefoil
   Non-crop uses: Conservation reserve program
- For any additional use(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 use(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 far dill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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Manufactured For:

Drexel Chemical Company P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972 J

#### **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 "DI-RECTIONS 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.

NOTIFICATION JAN 1 5 2009