

19713-231

07-30-1999

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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

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 19713-231	2. EPA Product Manager MR. LEONARD COLE	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL DIMETHOATE 4EC	PM# 04 insecticide-Rodenticide 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. _____  Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to <b>NOTIFICATION</b> Agency letter dated _____
<input checked="" 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.

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

A copy of the label (231SP-0799) with the corrected active ingredient footnote as per page 7, Chapter 6 of the 1998 EPA Label Review Manual is submitted, herewith, for your record and file. This correction is highlighted for your easy reference. A Certification Statement as per PR Notice 98-10 is also submitted, herewith. 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 <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
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 PIWONKA	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
<b>Certification</b> 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 	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G PIWONKA	5. Date July 22, 1999	

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NOTIFICATION

JUL 30 1999

Drexel

**Dimethoate 4EC**

Systemic Insecticide - Miticide

**ACTIVE INGREDIENT:**

Dimethoate: 0,0-Dimethyl S-[N-(methylcarbamoyl)  
methyl] phosphorodithioate ..... 43.5%

**OTHER INGREDIENTS:** ..... 56.5%

**TOTAL:** ..... 100.0%

One gallon contains 4 pounds of the active ingredient Dimethoate.

## KEEP OUT OF REACH OF CHILDREN WARNING / AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

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

EPA Reg. No. 19713-231

EPA Est. No. 19713-GA-1

Net Contents: \_\_\_\_\_

**FIRST AID**

**IF SWALLOWED:** Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not give anything by mouth to an unconscious person. Call a physician immediately.

**IF ON SKIN:** Wash skin with soap and water.

**IF INHALED:** Remove victim to fresh air. Apply artificial respiration if breathing has stopped. Call a physician.

**IF IN EYES:** Flush with water for at least 15 minutes. Get medical attention.

**NOTE TO PHYSICIAN:** Atropine is antidotal. Pralidoxime chloride may be effective as an adjunct to atropine. This product may cause cholinesterase inhibition. Treatment should be directed at the control of symptoms and clinical condition. Dimethoate is an organophosphate insecticide/miticide.

**PRECAUTIONARY STATEMENTS****Hazards To Humans and Domestic Animals**

**WARNING:** Harmful or fatal if swallowed. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes and clothing. May cause eye irritation. Use only with adequate ventilation. Do not contaminate food and feed products.

**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 B 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 or Butyl rubber, chemical-resistant footwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure. For exposures in enclosed areas, a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter.

For exposures outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P or HE filter.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

(Continued)

**PRECAUTIONARY STATEMENTS (Continued)**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**Engineering Control Statements:** When handlers use closed systems, enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

**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**

This product is toxic to wildlife and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water by cleaning of equipment or disposal of wastes.

This pesticide is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

**CHEMICAL HAZARDS**

Do not use, pour, spill or store near heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

**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, 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), restricted entry interval (REI) and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

(Continued)

Manufactured By:

**Drexel Chemical Company**

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

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### AGRICULTURAL USE REQUIREMENTS (Continued)

Do not enter or allow worker entry into treated areas during the restricted entry interval of 48 hours.

Personal Protective Equipment required for early entry to treated areas that is permitted under the Worker Protection Standard 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 or Butyl rubber, chemical-resistant footwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure.

### DIRECTIONS FOR DILUTION UNLESS STATED

**Dilute Application** - Ground Application For Field & Vegetable Crops: Apply specified rate in 20 to 60 gallons of water per acre.

**Concentrate Application** - Ground Application: Apply specified rate in not less than 5 gallons of water per acre.

**Orchard Application** - Apply equivalent per acre rates in 20 to 100 gallons of water per acre. Special concentrate equipment is necessary for these uses.

**Air Application** - Apply specified rate in 5 to 20 gallons of water per acre.

Orchard rates use equivalent per acre rate in not less than 10 gallons of water per acre. Do not use air application on Pecans.

Automatic flagging devices should be used whenever feasible. This product is intended for use in conventional hydraulic sprayers, ground applicators or aerial sprayers. Do not apply when weather conditions favor drift of spray from treated areas. Repeat applications as necessary unless otherwise specified. Consult your State Experiment Station or State Extension Service for proper timing of application.

### FRUIT CROPS

Crop	Pest Controlled	Rate	PHI (Days)
Apples	Apple maggots, Codling moths*	1 pt. per 100 gals. of water	28
	SPECIFIC DIRECTIONS: Do not apply during the bloom period. Apply at petal fall and every 10 to 14 days thereafter until control is achieved. Under heavy infestations, some sting injury may occur. *Midwest and Eastern states only: Do not graze livestock in treated orchards. Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom.		
Apples, Pears	Aphids, Leafhoppers, Mites (except Rust mites)	½ to 1 pt. per 100 gals. of water	28
	SPECIFIC DIRECTIONS: Do not apply during the bloom period. Do not graze livestock in treated orchards. Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom.		
Grapefruit, Lemons, Oranges, Tangerines	Aphids	GROUND: ½ to 1 pt. per 100 gals. of water. Apply as an outside coverage spray. AIR: 1 to 2 qts. per acre in 5 to 10 gals. of water.	15
	SPECIFIC DIRECTIONS: Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom. Do not apply during the bloom period.		
	Mites (except Rust mites)	GROUND: ½ to 1 pt. per 100 gals. of water. Apply as a thorough coverage spray.	15
	SPECIFIC DIRECTIONS: Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom. Do not apply during the bloom period.		
	Scales (except Black or Snow)	GROUND: 1 to 1½ pts. per 100 gals. of water. Apply as a thorough coverage spray.	45
	SPECIFIC DIRECTIONS: Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom. Do not apply during bloom period.		

(Continued)

Crop	Pest Controlled	Rate	PHI (Days)
(Continued) Grapefruit, Lemons, Oranges, Tangerines	Thrips	GROUND: ½ to 1 pt. per 100 gals. of water. AIR: 1 to 2 qts. per acre in 5 to 10 gals. of water.	15
	SPECIFIC DIRECTIONS: Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom. Do not apply during bloom period.		
	Whiteflies	GROUND: 1 pt. per 100 gals. of water. Apply as a thorough coverage spray.	15
SPECIFIC DIRECTIONS: Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom. Do not apply during bloom period. Do not use on citrus seedlings. Make no more than 2 applications to mature fruit. Do not graze livestock in treated orchards.			

### NUT CROPS

Crop	Pest Controlled	Rate	PHI (Days)
Pecans	Aphids, Mites, Leafhoppers	¾ pt.	21
SPECIFIC DIRECTIONS: Do not graze livestock in treated groves.			

### VEGETABLE CROPS

Crop	Pest Controlled	Rate per Acre	PHI (Days)
Beans (dry, green, lima, snap)	Aphids, Bean leaf beetles, Grasshoppers, Leafhoppers, Leafminers, Lygus bugs, Mexican bean beetles, Mites	½ to 1 pt.	0
SPECIFIC DIRECTIONS: Do not feed treated vines. This pesticide is highly toxic to bees. Do not apply if bees are visiting the areas to be treated when crop or weeds are in bloom.			
Broccoli, Cauliflower	Aphids	½ to 1 pt.	7
Brussels sprouts (CA Only)	Aphids	1 to 2 pts.	10
SPECIFIC DIRECTIONS: Apply in a minimum of 100 gals. of water per acre ground equipment. Do not graze livestock in treated fields. Do not apply by air. Do not exceed 6 applications per growing season.			
Cabbage	Aphids	½ to 1 pt.	3
Celery (FL)	Leafminers	1 pt.	7
Collards, Endive (escarole), Kale, Leaf lettuce, Mustard greens, Spinach, Swiss chard, Turnip (greens, roots)	Aphids, Leafhoppers, Leafminers	½ pt.	14
Head lettuce	Aphids, Leafhoppers, Leafminers	½ pt.	7
Lentils	Aphids	½ to 1 pt.	14
SPECIFIC DIRECTIONS: Do not feed or graze treated plants. Do not make more than two applications per season.			
(Continued)	Lygus	1 pt.	14
	SPECIFIC DIRECTIONS: Do not feed or graze treated plants. Do not make more than two applications per season.		

**VEGETABLE CROPS (Continued)**

Crop	Pest Controlled	Rate per Acre	PHI (Days)
Lupine	Aphids, Lygus bugs	½ to 1 pt.	0
	SPECIFIC DIRECTIONS: Apply when Aphids first appear. Make only 2 applications per season. Do not feed or graze forage or hay. This pesticide is highly toxic to bees. Do not apply if bees are visiting the area to be treated when crop or weeds are in bloom.		
Melons (except watermelons)	Aphids, Leafhoppers, Leafminers, Thrips	1 pt.	3
Peas	Aphids	½ to 1 pt.	0
	SPECIFIC DIRECTIONS: Do not feed or graze hay within 21 days after last application when a stationary viner is used. Do not feed or graze when a mobile viner is used. Do not make more than 1 application per growing season.		
	Lygus	1 pt.	0
	SPECIFIC DIRECTIONS: Do not feed or graze hay within 21 days after last application when a stationary viner is used. Do not feed or graze when a mobile viner is used. Do not make more than 1 application per growing season.		
Peppers	Aphids, Leafminers, Maggots	½ to ¾ pt.	0
Potatoes	Aphids, Grasshoppers, Leafhoppers, Leafminers	½ to ¾ pt.	
Tomatoes	Aphids, Leafhoppers, Leafminers	½ to 1 pt.	7
Watermelons	Aphids, Leafhoppers, Leafminers	½ to 2 pts.	3

**FIELD CROPS**

Crop	Pest Controlled	Rate per Acre	PHI (Days)
Alfalfa	Aphids, Grasshoppers, Leafhoppers, Plant bugs (including Lygus), reduction of Alfalfa weevil larvae	½ to 1 pt.	10
	SPECIFIC DIRECTIONS: Make only one application per cutting. Effective only on cutting to which applied. This product is highly toxic to bees. Do not apply if bees are visiting the area to be treated when crop or weeds are in bloom.		
Cotton (Grown in CA and AZ)	Fleahoppers, Leafhoppers, Plant bugs including Lygus	½ to 1 pt.	14
	SPECIFIC DIRECTIONS: Repeat applications should not be made at intervals closer than 14 days. Make only 2 applications per season at the higher rate. Do not feed treated forage or graze livestock on treated fields.		
Cotton	Aphids, Fleahoppers, Mites, Thrips	¼ to ½ pt.	14
	Plant bugs including Lygus	½ pt.	
	SPECIFIC DIRECTIONS: Repeat applications should not be made at intervals closer than 14 days. Do not feed treated forage or graze livestock on treated fields.		

Crop	Pest Controlled	Rate per Acre	PHI (Days)
Field corn	Aphids, Banks grass mites (except Trans Pecos area of TX), Bean beetles, "Corn rootworm adults, Two-spotted spider mites	¾ to 1 pt. Aerial Application: See "Specific Directions"	14
	SPECIFIC DIRECTIONS: Apply as necessary. Make no more than three (3) applications per year. Do not feed or graze within 14 days of last application. Do not apply to Corn during the pollen-shed period. Aerial Application: Spray over the foliage when Mites appear. Apply above rates in 1 or more gals. of water per acre. *Not registered in CA.		
	Grasshoppers	1 pt. See "Specific Directions"	14
	SPECIFIC DIRECTIONS: Do not apply to Corn during the pollen-shed period. Ground Application: Apply above rate in 20 to 40 gals. of water per acre. Aerial Application: Apply above rate in 2 or more gals. of water.		
Safflower (Grown in CA and AZ)	Aphids, Leafhoppers, Plant bugs including Lygus, Thrips	½ to 1 pt.	14
	SPECIFIC DIRECTIONS: Repeat applications should not be made at intervals closer than 14 days. Make only 2 applications per season at the higher rate.		
Sorghum (milo)	Aphids (green bugs)	½ to 1 pt. See "Specific Directions"	28
	SPECIFIC DIRECTIONS: Do not feed or graze (milo) within 28 days of last application. Make no more than 3 applications as needed per season. Do not apply after heading. Do not apply during the pollen-shed period. Ground Application: Apply above rate in 25 to 40 gals. of water per acre. Aerial Application: Apply above rate in 1 or more gals. of water per acre.		
	Banks grass mites (excluding Trans Pecos area of TX), Spider mites	1 pt. See "Specific Directions"	—
	SPECIFIC DIRECTIONS: Do not apply during the pollen-shed period. Ground Application: Apply above rate in 25 to 40 gals. of water per acre. Aerial Application: Apply above rate in 1 or more gals. of water per acre.		
	Grasshoppers	1 pt. See "Specific Directions"	—
	SPECIFIC DIRECTIONS: Do not apply during the pollen-shed period. Ground Application: Apply above rate in 25 to 40 gals. of water per acre. Aerial Application: Apply above rate in 1 or more gals. of water per acre.		
	Sorghum midge	¼ to ½ pt. See "Specific Directions"	—
	SPECIFIC DIRECTIONS: Do not apply during the pollen-shed period. Aerial Application: Apply above rates in 1 or more gals. of water per acre.		
Soybeans	Bean leaf beetles, Leafhoppers, Mexican bean beetles, Spider mites, "Three-cornered alfalfa hoppers	1 pt. See "Specific Directions"	21
	SPECIFIC DIRECTIONS: Do not feed or graze within 5 days of last application. Aerial Application: Apply recommended rate in a minimum of 2 gals. of water per acre. *Not registered in CA.		
	Grasshoppers	1 pt. See "Specific Directions"	21
	SPECIFIC DIRECTIONS: Do not feed or graze within 5 days of last application. Ground Application: Apply above rate in 25 to 40 gals. of water per acre. Aerial Application: Apply above rate in 1 or more gals. of water per acre.		
Wheat	Aphids (greenbugs)	½ to ¾ pt.	35
	SPECIFIC DIRECTIONS: Do not make more than 2 applications per season. Do not apply within 14 days of grazing immature plants.		
	Brown wheat mites	½ to ¾ pt.	35
	SPECIFIC DIRECTIONS: Do not make more than 2 applications per season. Do not apply within 14 days of grazing immature plants.		
	Grasshoppers	¾ pt.	35
	SPECIFIC DIRECTIONS: Do not make more than 2 applications per season. Do not apply within 14 days of grazing immature plants.		

# SEED CROPS

Crop	Pest Controlled	Rate per Acre	PHI (Days)
Alfalfa	Aphids, Grasshoppers, Leafhoppers, Lygus bugs, reduction of Alfalfa weevil larvae	½ to 1 pt.	10
SPECIFIC DIRECTIONS: Do not feed or graze livestock in treated crops, hay, threshings or stubble within 10 days of application. This product is highly toxic to bees. Do not apply if bees are visiting the area to be treated when crops or weeds are in bloom.			
Citrus (CA, AZ)	Aphids, Thrips	See "Specific Directions"	14
SPECIFIC DIRECTIONS: Follar Spray: 1 pt. per 100 gals. of water. Repeat applications as necessary. May be applied in the year Grapefruit, Lemon, Orange and Tangerine trees begin to bear fruit. Soil Drench (Trees 1 to 3 years old): 2 qts. per acre applied in the furrow or basin around the base of tree. Apply when insect injury to new growth appears. Do not apply to trees that will bear fruit within one year. Do not apply when trees or a substantial number of weeds in the orchard (grove) are in bloom. Note: Consult your State Agricultural Experiment Station or State Agricultural Extension Service for proper timing of application.			

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.  
**PESTICIDE STORAGE:** Store in a cool, dry, well ventilated area. Avoid high temperatures. Do not store below 45°F.  
**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:** Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by other procedures approved by State and Local authorities.

## WARRANTY—CONDITION 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. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.  
 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.

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**NOTIFICATION**

**JUL 30 1999**

July 22, 1999

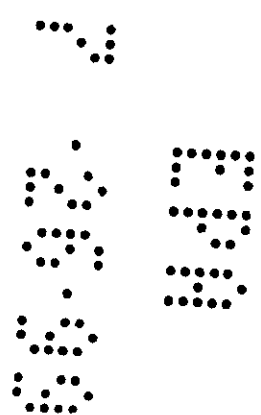
*Notification of Submission of Label Revisions as per PR Notice 98-10*

***DREXEL DIMETHOATE 4EC (EPA Reg. No. 19713-231)***

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 PIWONKA  
Registration Manager



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July 22, 1999

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460-0001

*Re: Submission of Revised Label by Notification as per PR Notice 98-10 – Drexel Dimethoate 4EC (EPA Reg. No. 19713-231)*

Reference is made to the above.

We are submitting, herewith:

1. Completed EPA Form 8570-1
2. A copy of the revised label (231SP-0799). The ingredient footnote was corrected as per Chapter 6, page 7 of the EPA 1998 Label Review Manual.

The change was highlighted for easy reference.

3. Certification Statement as per PR Notice 98-10.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370.

Thank you.

Sincerely,  
DREXEL CHEMICAL COMPANY

Luz G Piwonka  
Registration Manager

