1/10

Please read instructions on reverse	» before completing form.		Form Appr	roved	. OMB No. 2	<u>070-0060</u>	D. Approvel expires 2-28-9
SEPA Env	United States vironmental Protectio Washington, DC 204	• .	-		Registrat Amendm Other		OPP Identifier Number
	Applicatio	on for Pestici	de - Secti	ion			
1. Company/Product Number 19713-231		1	Product Managel Kenny	ger		F	oposed Classification None Restricted
4. Company/Product (Name) DREXEL DIMETHOATE 4E0	C	PM# 1/inse	ecticide-Rode	entic	ide Branch		
5. Name and Address of Applicant  Drexel Chemical Company P.O. Box 13327  Memphis, TN 38133-0327		(b)(i), n to:		s simil	ilar or identic	cal in com	FIFRA Section 3(c)(3) mposition and labeling
Check if this is a ne	ew eddross		uct Name				
		Section - I	11				
Amendment - Explain below Resubmission in response to Notification - Explain below.	to Agency letter dated		Final printed I Agency letter "Me Too" Ap Other - Explai	r date pplicat	ed _ ition.		OTIFICATION C 2 9 2005
One copy of 231SP-1205 is submitte	ed for your record and file. Detail	ails of this submission	<u>-</u>	r letter	r accompanyin	g this subi	mission. Thank you.
1. Material This Product Will Ele Pa		<u> </u>	11				
Child-Resistant Packaging Unit f	Packaging Yes No	Water Soluble Portion of Package wgt	No. per container			Container  Metal Plastic Glass Paper Other (Sp	pecify)
3. Location of Net Contents Informs  Lebel Contains	юг	ail Container	5	S. Loc	cation of Label	Direction	<b>18</b>
6. Manner in Which Lebel is Affixed	d to Product Lithogra Paper g Stencile	glued iled	Other				
		Section - I\	<del></del>				
1. Contact Point   Complete items o			e contacted, if	neces			
Name LUZ G CHAN	1	Title REGISTRATION	MANAGER			(901) 774-4	No. (Include Area Code) 4370
	Certificati I have made on this form and a wlingly false or misleading state	all attachments the				plete.	3. Duta Application Received (Stamped)
2. Signature Cuzla Chan	DN: on=Luz chan, c=US, o=Drexel Chemical Co. Date; 2005.12.15.10.04.50-06'00'	3. Title  REGISTRATION M	1ANAGER				
4. Typed Name LUZ G CHAN	.   5	5. Date Dec	cember 15,	, <b>20</b>	05		



December 15, 2005

Submission of Revised Label 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 CHAN

Registration Manager



# Dimethoate 4EC

Systemic Insecticide - Miticide

**ACTIVE INGREDIENT:** 

 Dimethoate\*
 43.5%

 OTHER INGREDIENTS:
 56.5%

 TOTAL:
 100.0%

\*This product contains 4 pounds of active ingredient per gallon.

## 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 the 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 ORGANOPHOSPHATE

#### 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

#### 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.

#### 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 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: 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

(Continued)

#### PRECAUTIONARY STATEMENTS (Cont.)

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

#### 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 48 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 or Butyl Rubber, chemical-resistant tootwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure.

## BEFORE USING READ WARNING STATEMENTS ON CONTAINER LABEL. DO NOT use on crops grown in greenhouses

This product has a systemic and contact activity against a broad spectrum of piercing, sucking and chewing insects; however, it may not control certain organophosphate-resistant species

TANK MIXING: This product is compatible in spray tank mixes with most insecticides, miticides and fungicides, provided they are not alkaline in reaction. Field experience indicates that this product has been satisfactorily mixed with captan, carbaryl, diazinon, dodine, azinphos methyl, dicolol, malathion, parathion, Pyrethroids thiram and zineb. Because uniform dispersibility and sprayability may be influenced by pesticide combinations used, it is recommended that compatibility be determined before adding pesticides to the spray tank.

In a pint or quart jar, mix products and water proportionale to the intended tank mix. If there is any separation, we recommend that the combination not be used. The addition of a non-ionic, general purpose spreader-activator will usually eliminate any incompatibility noted.

For proper mixing, spray tank should be at least three-fourths filled with water before adding this product. Add tank mixing products in the following order: water-soluble bags, wettable powders, dry flowables, liquid flowables, emulsifiable concentrates, and other soluble materials such as fertilizers. When tank mixing, allow water-soluble bags and soluble fertilizers to dissolve first before adding this produc. Mechanical agitation or recirculation through pump bypass to tank is usually sufficient for maintaining a good dispersion. This product should not be tank-mixed with other pesticides, surfactants or fertilizers, unless prior use has shown the combination non-injurious under your conditions of use. Follow precautionary statements and directions for all tank-mix products.

Spray tank mixes of this product with alkaline insecticides, fungicides, miticides and fertilizers should be applied promptly, however, alkaline materials such as Bordeaux mixture and lime should not be used. Tank mixing must be done in accordance with the more (most) restrictive of label limitations and use precautions for all products to be mixed. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prichibiting such mixing.

PHYTOTOXICITY STATEMENT: As is common with most emulsifiable concentrate formulations, adverse effects such as spotting or dis-coloration of the fruit or foliage can occur. Some conditions known to contribute to physiotoxicity include, but are not limited to high temperatures, poor spray drying conditions, excessive spray deposit or runoff, certain spray mixtures, stage of crop development or tank mixes with other pesticides

RESISTANCE MANAGEMENT: Based on historical use patterns in some areas, certain pest species listed on this label may have developed resistance to this product. Consult your local agricultural advisor, state cooperative extension service or regional company representative for recommendations.

**ODOR:** Dimethoate formulations may produce a distinctive odor during the spray operation, but under normal conditions this odor does not persist.

#### DIRECTIONS FOR DILUTION UNLESS STATED

<u>Dilute Application</u> - Ground Application For Field and 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 at least one gallon of finished spray per acre. Apply at least 5 gallons of finished spray per acre in CA. 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.

The use of a drift retardant agent cleared for food use is recommended when applying this product by air or ground

#### CHEMIGATION

Apply this product only through sprinkler, including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set or hand move, flood (basin), furrow, border or drip (trickle) irrigation system(s). Do not apply this product through any other type of irrigation system. Crop injury, lack of effectiveness or illegal pesticide residues in the crop can result from non-uniform distribution of treated water. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts. Do not connect an irrigation system (including greenhouse system) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person shall shut the system down and make necessary adjustments should the need arise

Mix, in a clean supply tank, the recommended amount of this product and any tank mixing products per acreage to be covered and needed quantity of water. On all crops, use sufficient gallonage of water to obtain thorough and uniform coverage, but not cause runoff or excessive leaching. This will vary depending on equipment, pest problem and state of crop growth. Application of more or less than optimal quantity of water may result in decreased chemical performance, crop injury or illegal pesticide residues. Meter this product into the irrigation water uniformly during the period of operation. Do not overlap application. Follow recommended label rates, application timing, and other directions and use precautions for crop being treated. Continuous mild agitation of pesticide mixture may be needed to assure uniform application, particularly if the supply tank requires a number of hours to empty.

#### CHEMIGATION SYSTEMS CONNECTED TO PUBLIC WATER SYSTEMS

Note: Drexel Chemical Company does not encourage connecting chemigation systems to public water supplies. The following information is provided for users who have diligently considered all other application and water supply options before electing to make such a connection.

Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of the fluid back toward the injection pump. The pesticide injection pipeline must contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock. Do not apply when wind speed favors drift beyond the area intended for treatment

#### SPRINKLER CHEMIGATION (FOLIAR SPRAY USES)

The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely af-

fected. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock. Allow sufficient time for pesticide to be flushed through all lines and all nozzles before turning off irrigation water. Do not apply when wind speed favors drift beyond the area intended for treatment.

## FLOOD (BASIN), FURROW AND BORDER CHEMIGATION (SOIL DRENCH USE)

Systems using a gravity flow pesticide dispensing system must meter the pesticide into the water at the head of the field and downstream of a hydraulic discontinuity such as a drop structure or weir box to decrease potential for water source contamination from backflow if water flow stops. Allow sufficient time for pesticide to be flushed through all lines before turning off irrigation water. Systems utilizing a pressurized water and pesticide injection system mus: meet the following requirements: a) The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow. b) The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump. c) The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down. d) The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops. e) The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected. f) Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

#### **NUT CROPS**

Crop	Pest Controlled	Rate per Acre	PHI (Days)
Pecans	Aphids, Mites, Leafhoppers	0 66 pt	21
	SPECIFIC DIRECTION graze live stock in treati	IS Do not use air applicati ed groves.	on Do not

#### **FRUIT CROPS**

Fruit Crops	Pest Controlled	Rate	PHI (Days)	
NON- BEARING. Pears	Aphids, Leafhoppers, Mites (except Rust mites), Pear psyllas	0.5 to 1 pt per 100 gals of water		
	SPECIFIC DIRECTIONS. Use the higher application rate when insect pest population is high. Do not graze livestock in treated orchards. Do not apply when trees or substantial numbers of weeds in the orchard (grove) are in bloom.			
Chemes (Pre-harvest) (ID, MT, OR, UT and WA only)	Aphids, Cherry fruit flies, Mites	Dilute Application: 0.5 to 1 pt. in a minimum of 100 gals, of water Concentrate Application: 2 to 4 pts. in a minimum of 50 galons of water per acre	21	
SPECIFIC DIRECTIONS. Use the higher application rate when insect pest population is high. On mature Tart cherries, use 3 pts. per acre. On mature Sweet chemes, use 4 pts. per acre. Precautions should be taken when using concentrate sprays to avoid fruit marking and injury on sensitive varieties (such as Ranier species). Make a single application within 7 days of adult Fty emergence in the area. This single application should be made in late May or early June when the fruit are small in size. Do not apply when trees or substantial numbers of weeds in the treatment area are in bloom. Do not graze livestock in treated orchards.				

#### FRUIT CROPS (Continued)

rhoii On	OPS (Continue	<del></del>	
Fruit Crops	Pest Controlled	Rate	PHI (Days)
Cherries (Post-harvest) (ID, MT, OR, UT and WA only)	Aphids, Cherry fruit flies, Mites	Dilute Application: 0.5 to 1 pt. in a minimum of 100 gals of water Concentrate Application: 2 to 4 pts. in a minimum of 50 gallons of water per acre	<u></u>
	of 7 days after fina made not to harves unfavorable market before fruit hardens substantial number Do not graze livest	FIONS: Make a single application I harvest or apply in cases where it due to poor fruit quality, a light of conditions. For best results, mak sor drops. Do not apply when tree so diveeds in the treatment area a ock in treated orchards. Only a sir made. Use the higher application ion is high.	a decision is rop or e application es or are in bloom, igle
Grapefruit, Kumquats, Lemons, Limes, Oranges, Pummelos, Tangelos, Tangerines	Aphids, Mites, (except Rust). Thrips, Whiteflies	Ground Application: 0 5 to 1 pt in 50 to 100 gals of water for dilute application Apply as a thorough distribution coverage spray Concentrate Application (Mist): Apply 1 to 2 qts per acre in sufficient water to provide full coverage of foliage Air Application: 1 to 2 qts per acre in 5 to 10 gals of water Use higher rate if infestation is heavy or if orchard foliage is dense	15
	Scales (except Black or Snow) SPECIFIC DIRECT	Ground Application: 0.5 to 1 5 pts. in 50 to 100 gals for dilute application Apply as a thorough distribution coverage spray Concentrate Application (Mist): 1 to 2 qts per acre in sufficient water to provide full coverage of foliage Air Application: 1 to 2 qts. per acre in 5 to 10 gals. of water. Use higher rate if infestation is heavy or if orchard foliage is dense.	15 or 45 (See Note below)
; ; []	substantial numbers not use on Citrus se orchards. Make no i	on is high. Do not apply when tree of weeds in the orchard are in ble eddings. Do not graze livestock in more than 2 applications to mature the for Scale control, PHI is	oom Do treated fruit
Citrus, Grapefruit, emons, Oranges.	Thrips	See *SPECIFIC DIRECTIONS*	15
Fangerines AZ Only)  CONTY  CO	in the amount of wai of foliage. The type concentration required for Application - An not less than 5 ga Ground Application is 1 in not less than 1 greated groves with use of dimethoate is given orchard from such time as there had of the trees. Aphat period of time bours before sunrise prevail. 1) Before the has open blooms priham 10% of the total he initiation of peta emaining in the orchard rates of Featl applications of different 1080, written of farm manager, as of pesticides, excep Pesticide Applications of the total pesticides, excep Pesticide Application shestrictions/Special pplicators shall mainfice, the original of coordance with this of later than Monda.	ONS Use specified dosages of their necessary to achieve adequate of equipment used will determine ed pply up to 2 ibs of active ingredie is of water per acre.  In Apply up to 2 ibs of active ingredie is of water per acre.  In Apply up to 2 ibs of active ingredie is of water per acre.  In Adays of last application is prohibited during any time of dawhen that orchard is 10% open bloas been at least 75% petal fall on epilications of dimethoate shall be intertween one (1) hour after sunset is when any one of the following cole onset of petal fall, the orchard to essent and these open blooms repit anticipated blooms in the orchard fall, there are less than 25% of open and to be treated 3) it is between estimany 15th and May 1st.  In that private applicators may omit on Report section. The description or chard to be treated as it was at that private applicators may omit on Report section. The description or chard to be treated as it was all be indicated in the section for instructions. Both private and cus it to the Agriculture Department's Feach completed Form 1080, done label Each Form 1080 shall be py following the week in which the ahen holidays intervene.	a coverage the at (2 qts.) redient (2 qts.) redient (2 qt enter the common to the common



#### FRUIT CROPS (Continued,

Fruit Crops	Pest Controlled	Rate	PHI (Days)	
Citrus (AZ & CA: Non-bearing and Nursery stock)	Aphids, Thrips	Foliar Spray: 1 pt. per 100 gals. of water. Repeat applications as necessary. May be applied in the year trees begin to bear fruit.  Soil Drench (trees 1 to 3 years old): 2 qts. per acre. Apply in the furrow or basin around the base of the tree. Apply when insect injury to rew growth appears. Do not apply to trees that will bear fruit within 1 year.	-	
		NS. Do not apply when trees or f weeds in the orchard are in blo treated orchards.	om. Do	
Pears	Aphids, Leafroppers, Pear psyllas, Mites (except Rust)	Ground Application: 0.5 to 1 pt. for dilute application. Apply as a thorough distribution coverage spray. Concentrate Application (Mist): 1 to 2 qts per acre in sufficient water to pro- vide full coverage of foliage Air Application: 1 to 2 qts. per acre in 5 to 10 gals. of water	28	
•	SPECIFIC DIRECTIONS. Use the higher rate if insect pest population is high or if orchard foliage is dense. Do not apply when frees or substantial numbers of weeds in the orchard are in bloom. Do not graze livestock in treated orchards. See also "NON-BEARING. Pears".			

#### **VEGETABLE CROPS**

Vegetable Crops	Pest Controlled	Rate* per Acre	PHI (Days)	
Asparagus	Aphids. Asparagus beetles	1 pt.	180	
(Except AZ & CA)	SPECIFIC DIRECTIONS: App no less than 7-day intervals, up per acre per year. Do not app before harvest.	o to a maximum	of 5 pts.	
Beans (Dry, Green, Lima, Lupine, Snap)	Aphids, Bean leaf beetles, Grasshoppers, Leafhoppers, Leafminers, Lygus bugs, Mexican bean beetles, Miles	0.5 to 1 pt.	0	
	SPECIFIC DIRECTIONS Do Do not apply if bees are visiting when crops or weeds are in b	ng the area to be		
Broccoli, Cauliflower	Aphids	0 5 to 1 pt	7	
Brussels sprouts	Aphids	1 to 2 pts	10	
(CA Only)	SPECIFIC DIRECTIONS App gals, of water per acre by grou graze livestock in treated field: not exceed 6 applications per	ind equipment. D s Do not apply b	o not y air. Do	
Celery	Camine mites, Leafminers, Twospotted spider mites	1 pt.	7	
Endive (Escarole). Kale, Leaf lettuce, Mustard greens, Swiss chard, Tumip (Greens, Roots)	Aphids, Leathoppers, Leatminers	0 5 pt.	14	
Garbanzo beans	Aphids, Grasshoppers, Leafhoppers, Leafminers, Lyyus bugs, Mites	0.5 to 1 pts	0	
	SPECIFIC DIRECTIONS Do not feed or graze treated wires Do not apply if bees are visiting the area to be treated when crops or weeds are in bloom			
Lentils	Aphids	0 33 to 1 pt	14	
(Continued)	SPECIFIC DIRECTIONS. Do not feed or graze treated plants. Do not make more than two applications per season. Do not apply if bees are usiling the areas to be treated when crops or weeds are in bloom.			
*Where a range of ap	oplication rate is indicated, appl	y the higher rate	when	

#### FOFTABLE CROPS (Continued)

Vegetable	Pest	Rate*	PHI	
Crops	Controlled	per Acre	(Days)	
Lentils	Lygus bugs	1 pt.	14	
(Cont.)	SPECIFIC DIRECTIONS: Do not feed or graze treated plants. Do not make more than 2 applications per season. Do not apply if bees are visiting the areas to be treated when crops or weeds are in bloom.			
Lentils (WA only)	Aphids, Lygus bugs	0.25 to 1 pt.	14	
	SPECIFIC DIRECTIONS: App Repeat as needed. Do not fer vines. Note: CHEMIGATION - Do no imgation system.	ed or graze hay o	rtreated	
Melons (Except Watermelons)	Aphids, Leafhoppers, Leafminers, Maggots, Thrips	1 pt.	3	
Peas	Aphids	0.33 to 1 pt.	0	
	SPECIFIC DIRECTIONS: Do 21 days after last application used. Do not feed or graze with Do not make more than 1 app Do not apply if bees are visiting when crops or weeds are in b.	when a stationary nen a mobile viner dication per growing the areas to be	viner is is used ng season.	
	Lygus bugs 1 pt. 0  SPECIFIC DIRECTIONS. Do not feed or graze hay within 21 days after last application when a stationary winer is used. Do not feed or graze when a mobile winer is used Do not make more than 1 application per growing season. Do not apply if bees are visiting the areas to be treated when crops or weeds are in bloom.			
Peas (Dry) (ID, OR and WA	Aphids SPECIFIC DIRECTIONS: App	0.33 to 0.66 pt	14	
	or air application. Do not exceed 1 pt. per acre per year. Allow at least 7 days between applications. Do not graze livestock on cover crops in treated areas.  Note: This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product to blooming Austrian Winter peas. Apply as a pre-bloom or post-bloom spray only.  CHEMIGATION. Do not apply through any type of irrigation system.			
Peas (Succulent)	Aphids	0 33 pt.	5	
(ID. OR and WA only)		0.5 to 0.66 pt.	14	
	SPECIFIC DIRECTIONS: App volume of not less than 5 gats. or air application. Do not excee Allow at least 7 days between livestock on cover crops in tret Note: This product is highly to treatment or residues on bloom apply this product to blooming as a pre-bloom or post-bloom CHEMIGATION: Do not apply t system.	of water per acre ed 1 pt. per acre applications. Do n ated areas. acc to bees expos ning crops or wee Austrian Winter p spray only hrough any type o	by ground per year not graze ed to direct ds. Do not eas. Apply	
Peas (Succulent - With Pod) (CA Only)	Aphids, Leafminers, Thrips	0.33 pt.	5	
	SPECIFIC DIRECTIONS. Multiple applications may be made at 14-day intervals. Do not exceed 0.68 lb a.i. (1.36 pts. of this product) per acre per season. Do not make more than 4 applications per growing season.			
Peppers	Aphids. Lealminers, Maggots	0 5 to 0 66 pt.	0	
Potatoes	Aphids, Grasshoppers, Leafhoppers, Leafminers	0.5 to 1 pt.	0	
Tomatoes	Aphids, Leafhoppers, Leafminers	0.5 to 1 pt.	7	
Watermelons	Aphids, Leafhoppers, Leafminers, Maggots, Thrips	0.5 to 2 pts.	3	
Mhara a mana at as				

"Where a range of application rate is indicated, apply the higher rate when insect pest population is high.

#### FIELD CROPS

Field Crops	Pest Controlled	Rate* per Acre	PHI (Days)	
Alfatfa, Sainfoin	Aphids, Grasshoppers. Leafhoppers, Plant bugs including Lygus, reduction of Affaffa weevil larvae	0.5 to 1 pt	10	
	SPECIFIC DIRECTIONS Do harvest or pasturing. Make onl Effective only on cutting to whit bees are visiting the area to b weeds are in bloom.	ly 1 application p ch applied. Do r	er cutting not apply if	
Cotton (Grown in AZ and CA)	Black Fleahoppers, Leafhoppers, Plant bugs including Lygus, Thrips	0.5 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 in treated fields			

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#### FIELD CROPS (Continued)

Field Crops	Pest Controlled	Rate* per Acre	(Days
Cotton (Except AZ and CA)	Aphids, Fleahoppers, Mites, Plant bugs, Thrips	0.25 to 0.5 pt.	14
	SPECIFIC DIRECTIONS: Whe dilution, repeat applications shintervals closer than 14 days we getable oil is used for dilution should not be made at intervals Make only 2 applications per supply at least 1 qt. of firished lead treated forage or graze in	ould not be mad When once refind in, repeat applic is closer than 40 eason at the hig spray per acre.	de at ed ations days. pher rate. Do not
	Lygus bugs  SPECIFIC DIRECTIONS: Whe dilution, repeat applications sh intarvals closer than 14 days. V vegetable oil is used for dilutio only 2 applications per season at east 1 qt. of finished spray i treated forage or graze livestor	ould not be mad When once refind n, PHI is 40 day at the higher ra ber acre. Do not	le at ed s. Make te. Apply feed
Field com	Aphids, Banks grass mites (except Trans Pecos area of TX), Bean beetles, Com roctworms (adults), Fieahoppers, Thrips, Two- spotted spider mites	0.66 to 1 pt.	14
	SPECIFIC DIRECTIONS Appl more than 3 applications per ye within 14 days of last application during the pollen-shed penod it area <b>Ground Application</b> - A 40 gals, of water per acre. Air above rates in 1 or more gals. Grasshoppers	ear Do not feed on Do not apply bees are visiting pply above rate Application - A	or graze to Coming the in 20 to pply
·	SPECIFIC DIRECTIONS Gro above rates in 20 to 40 gais o Application - Apply above rate water Do not apply to Com du period if bees are visiting the a 3 applications per year Do not days of last application	und Application f water per acre sin 1 or more gi ning the pollen-si rea. Make no m	n - Apply Air als, of hed lore than
Safflower (Grown in AZ and CA)	Aphids, Leafhoppers, Plant bugs including Lygus, Thros SPECIFIC DIRECTIONS Repe	0.5 to 1 pt.	14
	not be made at intervals closer only 2 applications per season	than 14 days. Mat the higher rat	lake
Sorghum (Milo)	Aprids (Green bugs)  SPECIFIC DIRECTIONS Ground above rates in 25 to 40 gais of Application - Apply above rate water per acre Do not feed or applications as needed per seatheading. Do not apply during the	water per acre is in 1 or more g graze Milo within no more than 3 ason. Do not app	Air gat of n 28
	Grasshoppers, Mites (including Banks grass mites   [excluding Trans Pecos area of TX]), Twospotted spider mites	1 pi	28
	SPECIFIC DIRECTIONS Grou above rates in 25 to 40 gais of Application - Apply above rate water per acre. Do not feel diri- days of last application. Make in applications as needed per second	water per acre s in 1 or more g graze Milo withir c more than 3 isan Do not app	Air ial of 128 oly after
	heading. Do not apply during the Sorghum midge	0 25 to 0 5 pt	28
	SPECIFIC DIRECTIONS Grou above rates in 25 to 40 gals of Application - Apply above rate water per acre Do not feed or days of last application. Make na applications as needed per sea heading. Do not apply during the	nd Application water per acre s in 1 or more g graze Milo withir o more than 3 son. Do not app	· Apply Air al of 128 biy after
Soybeans	Alfalla loopers, Aphids Bean leaf beetles, Leafhoppers Mexican bean beetles Spider mites, Threecornered alfalfa hoppers  SPECIFIC DIRECTIONS Grou	1 pt	21 - Apoly
	STOUR CIDECIADING GIOU		- Apply
Continued)	above rate in 25 to 40 gals, of v <b>Application</b> - Apply above rate of water per acre. Do not feed o	in a minimum o	

insect pest population is high.

#### FIELD CROPS (Continued)

Field Crops	Pest Controlled	Rate* per Acre	PHI (Days)		
Soybeans	Grasshoppers	1 pt	21		
(Cont.)	SPECIFIC DIRECTIONS Ground Application Apply above rate in 25 to 40 gals, of water per acra Air Application - Apply above rate in 1 or more ga of water per acre. Do not feed or graze within 5 da last application.				
Triticale, Wheat	Aphids, (Greenbugs), Wheat midges	0 5 to 0.75 pt.	35		
	SPECIFIC DIRECTIONS Do not apply within 14 day of grazing immature plants. Make no more than 2 applications per season.  Note: Pre-harvest interval for CA is 60 days.				
	Brown wheat mites	0.33 to 0.5 pt.	35		
	SPECIFIC DIRECTIONS: Do not apply within 14 days of grazing immature plants. Make no more than 2 applications per season.  Note: Pre-harvest interval for CA is 60 days				
	Grasshoppers	0 75 pt.	35		
	SPECIFIC DIRECTIONS Do not apply within 14 days of grazing immature plants. Make no more than 2 applications per season.  Note: Pre-harvest interval for CA is 60 days.				
*Where a range of	application rate is indicated, app	ly the higher rate	when		

\*Where a range of application rate is indicated, apply the higher rate when insect pest population is high

#### **SEED CROPS**

Pest Controlled	Rate* per Acre	PHI (Days)		
Aphids, Grasshoppers, Leathoppers, Lygus bugs, reduction of Affalfa weevil larvae	0.5 to 1 pt.	10		
weeds in the treatment area are in bloom. Do				
Aphids, Plant bugs, Thrips, Winter grain mites	0.5 to 0.66 pt.	14		
SPECIFIC DIRECTIONS. Apply in a minimum of 2 gals, of water per acre. Apply by ground or aerial equipment. Do not graze or use seed or seed screenings for feed purposes. DO NOT USE on seed Bermudagrass, seed Carrots, or seed Onions.				
	Aphids, Grasshoppers, Leathoppers, Lygus bugs, reduction of Alfalfa weevil larvae  SPECIFIC DIRECTIONS Do weeds in the treatment area a or graze livestock in treated cistubble within 10 days of appl Aphids, Plant bugs, Thinps, Winter grain miles  SPECIFIC DIRECTIONS, Appgals, of water per acre Apply equipment. Do not graze or us screenings for feed purposes	Aphids, Grasshoppers, Lealhoppers, Lygus bugs, reduction of Alfalfa weevil larvae  SPECIFIC DIRECTIONS Do not apply if the co weeds in the treatment area are in bloom. Do or graze livestock in treated crop, hay, threshin stubble within 10 days of application.  Aphids, Plant bugs, Thinps.  O 5 to 0 66 pt. Winter grain mites  SPECIFIC DIRECTIONS, Apply in a minimum gals, of water per acre. Apply by ground or aer equipment. Do not graze or use seed or seed screenings for feed purposes. DO NOT USE o		

## ORNAMENTAL PLANTS GROWN IN OUTDOOR NURSERIES ONLY

Do not use this product on ornamental plants grown in greenhouses. Christmas tree and conifer plantations, landscapes, interiorscapes and residential, public, recreational, commercial, industrial and institutional establishments.

This product is generally effective in controlling aphids, thrips, leaf miners, scales, leafhoppers and mites. Make adequate spray when pests appear or when damage is first observed. Do not overdose or overspray. For proper timing of treatments for the control of specific pests on ornamental plants, consult your state agricultural experiment station or state agricultural extension service.

Do not use on ornamental plants not listed. Do not use on any ornamental stock plants grown as a source of propagation material, such as cuttings, layers, root stocks or scions for grafting or budding. Do not use in spray mixtures containing oil. Do not use on plants growing in greenhouses.

For ornamental shade and nursery trees to control aphids and elm leaf beetle apply as a soil injection at the rate of one-half teaspoonful of product per inch of tree circumference measured at approximately 4.5 to 5 feet above ground level. Apply using a low-pressure injector to a 4 to 6 inch level below ground surface within the dripline of the tree. Water heavily after application Application should be made once per growing season (twice per season for elm leaf beetles; once shortly after trees leaf out, and once 6 to 8 weeks later.) Some species such as River Birch, Prunus, Ornamental Cherry, Hawthorne, Japanese Lace Maple and Aspens may show phytotoxic effects at label rates. DO NOT USE ON BEARING FRUIT TREES.

IMPORTANT When making soil injections, use a low pressure soil injection device. Always wear a full face shield, rubber gloves, long-sleeved shirt and rubber apron. DO NOT inject into soil areas where children or pets may dig or exhume treated soil.

Plant	Pest Controlled	Rate of Application
Arborvitae	Aphids, Bagworms, Mites	2 tsps. per gal. water (3.5 fl. ozs. per 10 gals. water
Azaleas	Lace bugs, Leaf miners, Mites, Tea scale and White files	1 tsp. per gal. water (1.75 fl. ozs. per 10 gals. wate
Birch	Aphids, Leafminers	0.5 to 1 tsp. per gal. water (0.8 to 1.75 fl. ozs. per 10 gals. water)
	leaves are expanded as	S: For Leafminers, apply when not repeat in 6 weeks. Use the in when insect pest population is
Boxwood	Leafminers, Mealybugs and Mites	1 tsp. per gal water (1.75 fl. ozs. per 10 gals. water)
		S. For Leafminers, apply in flies first appear or in early irvae.
Camellias	Aphids, Camelia scale and Tea scale, Mites	1 tsp. per gal. water (1 75 fl. ozs. per 10 gals. water Soil Drench: 2 fl. ozs. in 1 gal. water
	method, use 2 fl. ozs. in 6 inches tall, Increase ra	S Using the Soil Drench 1 gallon of water for plants up to the proportionately for larger rench around the base of plants
Carnations	Aphids, Thrips and Mites	Soil Drench: 2 fl ozs per 500 sq. ft. of bed or bench.
	SPECIFIC DIRECTIONS even distribution. Water application.	S. Apply in sufficient water for
Cedar	Mites	2 tsps. per gal water (3.5 fl ozs. per 10 gals. water)
Christmas trees	Bagworms, Balsam twg aphids, Blue aphids, European pine shoot moths, Mites, Nantucket pine tip moths, Zimmerman pine moths	3 tsps. per gal. water (5.25 fl. ozs. per 10 gals. water or 10 to 1.5 pints per 30 to 50 gals. of water per acre using mist blower or in a minimum of 10 gals. of water by air)
	SPECIFIC DIRECTIONS maples or Red leaf orna	
Cottonwood (Poplar)	Aphids, Bagworms, Leaf beetles	Foliar Spray: App y 2 ozs per 6 gals, water Soil Injection: 0 08 oz, per inch of tree circumference
·	per 6 gallons of water P necessary, up to 4 spray Apply at a rate of 0 08 o circumference measured ground level. Application trees leaf out and again inject to a 4 to 6 inch leve Number of injections sho circumference. Water he water Leaf beetle (Cher acre through drip line. Al times. Refer to the Cher application information.	d approximately 5 feet above is should be made shortly after 6 to 8 weeks later, if necessary el below ground surface, build equal inches of tree awiy with at least two inches of migation) - 1 33 to 4 pints per opplication may be repeated two nigation section for additional
Cypress	Bactra moth larvae	1 tsp per gal water (1 75 fl ozs per 10 gals water)
Daylillies	SPECIFIC DIRECTIONS Aphids, Threps	2 tsps per gal water
Douglas fir	Fir cone midge	(3.5 ft ozs per 10 gals water) 4 tsps per gal water (7 ft ozs. in 10 gals water)
		Make thorough coverage are closed and pendant. Use prayer
raser fir	Rosette bud mites	1 to 2 tsps per gal water (1.33 pints per 100 gals water)
	sprayer with a handheld : trunk and timbs on front a	Use a high pressure hydraulic spray gun to thoroughly wet and back of tree. Use the higher of pest population is high.

Plant	Pest Controlled	Rate of Application
Euonymus	Aphids, Scales	1 to 2 tsps per gal water (1 75 to 3.5 fl. ozs per 10 gals water)
	SPECIFIC DIRECTION application if insect per	IS: Use the higher rate of st population is high
Ficus nitida	Thrips	1 tsp. per gal water (1.75 fl. ozs. per 10 gals water
Gardenias	Tea scale and Whitefly	1 tsp per gal water (1.75 fl. ozs. per 10 gals water
Gerberas	Thnps	1 tsp per gai water (1 75 fi ozs per 10 gals water
Gladiolus	Aphids, Thrips	1 tsp per gal water (1.75 fl ozs per 10 gals water
Hackberry	Hackberry budgall psyllid, Hackberry hipplegall psyllid	Soil Injection: 1 part to 3 parts dilution
	this product to 3 parts v pressure injector, inject below ground for each o Make insertions within o	S Use a 1.3 dilution (1 part of vater) Apply using a low- 1 ft. oz of the dilution 6 inches one-half inch of trunk diameter dirpline of tree. Apply prior to bud plants that have not been 3 years.
Hemlocks	Mites, Scales	1 tsp per gal water (1.75 ft oz per 10 gats water)
Holly (English &	Leafminers, Mites, Soft scale	1 tsp per gal water (1.75 fl ozs per 10 gals water)
American, not Burford variety)		S: For Leafminers, apply in flies first appear, or in early arvae in infested leaves
Honeysuckle	Honeysuckle aphid	Soil Injection: 1 part to 3 parts dilution (1 fl oz. of this product for every 3 fl ozs of water)
	SPECIFIC DIRECTIONS: Use a 1.3 dilution (1 fl oz of this product for every 3 fl. ozs of water). Apply using a low-pressure injector inject 1.25 fl ozs of the dilution 6 inches below ground for each one-half inch of trunk diameter. Do not apply to plants that have not been established for at least 3 years.	
ins	Aphids, Iris borer. Thrips	2 tsps. per gal. water (3.5 fl. ozs. per 10 gals. water)
	SPECIFIC DIRECTIONS: For borer control, spray when new leaves are 5 to 6 inches tall	
Dak	Golden oak scale	2 tsps per gai water (3.5 fl ozs per 10 gals water)
Pines, Juniper	Aphids, Bagworms, European pine shoot moth, Midges, Mites, Zimmerman pine moth	2 tsps. per gall water (3.5 fl ozs per 10 gals water)
	Lobfolly pine sawfly, Nantucket pine tip moth	35 tsps per gal water (6 ft ozs per 10 gals water)
Pinyon pine	Pinyon needle scale	2.5 tsps per gal water (12.5 fl ozs per 10 gals water)
	the base of the frees and that can be reached from application when crawler	Apply spray to egg masses at to all rough bark and crotches the ground. Make this bark is start to emerge from the eggs ok sprayer. Do not spray leaves
	or needles since phytoto:	xicity may result
	borer, Pinyon spindle gall midge, Tip moth	Soit Injection: 1 part to 3 parts dilution (1 fl oz of this product for every 3 fl. ozs of water)
	SPECIFIC DIRECTIONS. Use a 1.3 dilution (1 floz of this product for every 3 ff. ozs. of water). Apply using a low-pressure injector. Inject 1.5 fl. ozs. of the dilution 6 inches below ground surface for each 1 inch of trunk diameter. Make insertions within displine of tree. For Spindle gall midge and Tip moth apply in mid to late Spring. For Pinyon borer make application in early Summer.	
oinsettia	Aphids, Mealybugs, Mites, Whiteflies	1 tsp per gal water (1 75 fl ozs per 10 gals water)
Roses		1 tsp. per gal water (1 75 fl ozs. per 10 gals water)
	SPECIFIC DIRECTIONS: For Foliar spray apply 2 sprays 6 weeks apart the first year followed by annual applications soon after the first growth begins in the Spring. For Soil drench apply as a soil drench around the base of plants in early Spring at the rate of 2 tablespoons (1 fl. oz.) per gallon of water per plant.	
	Spring. For Soil drench the base of plants in early	/ Spring at the rate of 2

#### 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, confact 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—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 Selfer 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 hable 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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December 15, 2005

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm. 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202

Re: Submission of Revised Label by Notification per PR Notice 98-10 DREXEL DIMETHOATE 4EC (EPA Reg. No. 19713-231)

#### Herewith:

- 1. Completed EPA Form 8570-1
- 2. One (1) copy of the revised label (231SP-1205) reinstating the following label change confirmed by the Agency as accepted by Notification on February 22, 2005:

On page 6 of the label, under Christmas tree, the recommendation was restated to also read "or 1.0 to 1.5 pints per 30 to 50 gallons of water per acre using mistblower or in a minimum of 10 gallons of water by air" for clarity.

It was an oversight on my part not to incorporate the above label change into the final label we submitted to the Agency on September 21, 2005 in response to EPA's letter dated September 1, 2005. (Note: The label EPA Stamped Accepted on September 1, 2005 was the label (231SP-111704++(Pending) we submitted to the Agency on November 18, 2004.)

- Copy of EPA's fax dated February 22, 2005 and the label Drexel submitted on February 9, 2005.
- 4. Certification Statement

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

Thank you.

Respectfully yours,

FOR DREXEL CHEMICAL COMPANY

Luz G Chan

Registration Manager

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