

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Attn: Luz Chan

Drexel Chemical Company

P.O. Box 13327

Memphis, TN 38113-0327

DEC 15 2009

Subject:

DREXEL CARBARYL 80 DUST BASE

EPA Reg. No. 19713-244

Your Application Dated October 30, 2009

Minor Label Correction and Added Container Disposal Statement for

Nonrefillable Flexible Bags

Dear Ms. Chan;

The label referred to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. Within 45 days from the date of this notice, two copies of a final printed label must be submitted. You may distribute products bearing the old label for twelve months from receipt of this letter or your next printing of the label, whichever comes first.

A copy of the stamped label is enclosed for your records.

Sincerely yours,

Joanne S. Edwards

Insecticide-Rodenticide Branch

Registration Division (7504P)

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Q EDA

United States

Environmental Protection Agency

	Registration
	Amendmen
/	Other

OPP Identifier Number

Washington, DC 20460	Amendment Other									
Application:	for Pesticide - Section I									
I. Company/Product Number 19713-244	2. EPA Product Manager John Hebert 3. Proposed Classification ✓ None Restricted									
4. Company/Product (Name) DREXEL CARBARYL 80 DUST BASE	PM# 67 Insecticide-Rodenticide Branch									
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327	6: Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No									
Check if this is a new address	Product Name									
	Section - II									
Amendment - Explain below. Resubmission in response to Agency letter dated	Final printed labels in repsonse to Agency letter dated "Me Too" Application.									
Notification - Explain below.	Other - Explain below.									
Explanation: Use additional page(s) if necessary. (For section I and Section II.)										
Submission of revised label per PR Notices 2007-4 and 98-10. Details are in the cover letter accompanying this submission. Thank you.										
	Section - III									
1. Material This Product Will Be Packaged In:	· · · · · · · · · · · · · · · · · · ·									
Yes ✓ No If "Yes" Unit Packaging wat. container Yes No. per Unit Packaging wat. container	Vater Soluble Packaging Yes No f "Yes" Package wgt Vater Soluble Packaging 2. Type of Container Metal Plastic Glass Paper Other (Specify) Polywoven bag									
be submitted										
3. Location of Net Contents Information 4. Size(s) Retail (✓ Label Container 30	5. Location of Label Directions 5. 50, 55 LBS. On the label									
6. Manner in Which Lebel is Affixed to Product J Lithograph Paper glue	Other									
Section - IV										
1. Contact Point (Complete items directly below for identification of	findividual to be contacted, if necessary, to process this application.)									
Name Titt LUZ G CHAN RE	Telephone No. (Include Area Code) (901) 774-437()									
Certification I certify that the statements I have made on this form and all I acknowledge that any knowlingly false or misleading statem both under applicable law.	attachments thereto are true, accurate and complets. Received									
2. Signature Cuga Chan 2009.10.30 RE 15:17:03 -05'00'	Title EGISTRATION MANAGER									
4. Typed Name LUZ G CHAN	October 30, 2009									



October 30, 2009

Submission of Revised Label per PR Notice 2007-4
DREXEL CARBARYL 80 DUST BASE (EPA Reg. No. 19713-244)

This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA Regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. 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 requirements of 40 CFR 156.10, 156.140, 156.144, and 156.146 and 156.156, 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

Registration Manager



Drexel Chemical Company

October 30, 2009

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 Revised Label per PR Notices 2007-4 and 98-10 DREXEL CARBARYL 80 DUST BASE (EPA Reg. No. 19713-244)

Herewith:

- 1. Completed EPA Form 8570-1
- 2. One (1) copy of the label (244SR-0709*) with added container disposal statement for nonrefillable flexible bags all weights.

Also, the word "using" that was inadvertently left of the statement in the Precautionary Statements that was approved by EPA on 7/16/2009 was reinstated.

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

December 15, 2009

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. \c\7\3 - 244



Carbaryl 80 Dust Base

For Manufacturing Use Only

ACTIVE INGREDIENT:

Carbaryl (1-Naphthyl-N-methylcarbamate)	80.0%
OTHER INGREDIENTS:	20.0%
TOTAL:	100.0%

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-244 EPA Est. No. 19713-XX-XXX

Net Content:

FIRST AID

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

IF ON SKIN OR CLOTHING:

- · Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

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

Have the product container or label with you when calling 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.

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NOTE TO PHYSICIAN: Carbaryl is a carbamate insecticide, which is a cholinesterase inhibitor. Overexposure to this substance may cause toxic signs and symptoms due to stimulation of the cholinergic nervous system. These effects of overexposure are spontaneously and rapidly reversible.

Specific treatment consists of parenteral atropine sulfate. Caution should be maintained to prevent overatropinization. Mild cases may be given 1 to 2 mg intramuscularly every 10 minutes until full atropinization has been achieved and repeated thereafter whenever symptoms reappear. Severe cases should be given 2 to 4 mg intravenously every 10 minutes until fully atropinized, then intramuscularly every 30 to 60 minutes to maintain the effect for at least 12 hours. Dosages for children should be appropriately reduced. Complete recovery from overexposure is to be expected within 24 hours. Narcotics and other sedatives should not be used. Further, drugs like 2-PAM (pyridine-2-aldoxime methodide) are NOT recommended.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Harmful if absorbed through the skin. Avoid contact with eyes, skin or clothing.

Wear long-sleeved shirt and long pants, and shoes plus socks and chemical-resistant gloves when handling this product. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Wash before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic invertebrates. 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 Pollutant 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.

Manufactured By:

Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 36.113-0327
SINCE 1972

DIRECTIONS FOR USE

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

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

Formulators who use this product are responsible for obtaining EPA registration for their formulated product.

 Only for formulation into an insecticide and acaricide for the following uses:

Asparagus; Brassica leafy vegetables (Crop group 5); Corn (field, pop, sweet); Rice, Sorghum; Cucurbit vegetables (Crop group 9); Flax; Alfalfa; Clover; Birdsfoot trefoil; Fruiting vegetables (Crop group 8); Leafy vegetables (Crop group 4); Dried shelled pea and bean (except soybean) Subgroup 6C; Edible-podded legume vegetables (Subgroup 6A); Soybeans; Okra; Grasses (food/feed); Peanuts, Prickly pear cactus; Rangeland (food/feed); Root and Tuber vegetables including Sugarbeet and Sweet potato (Crop group 1); Leaves of root and tuber vegetables (Crop group 2); Small fruit and berries - Bushberry (Subgroup 13-B), Caneberry (Subgroup 13-A), Cranberry, Grapes, Strawberry; Sunflower; Tobacco: Tree fruits (Citrus fruits - Crop group 10, Olives, Pome fruits - Crop group 11, Stone fruits - Crop group 12); Tree nuts (Crop group 14); Pistachio; Oyster beds (nonfood); Noncropland (Conservation Reserve Program Acreage, Set Aside Program Acreage, Wasteland, Rights-of-Way, Roadsides, Ditchbanks and Hedgerows), Forested areas, Turfgrass (Sod farms; Golf courses; Recreational areas, Lawns), Ornamental trees, Shrubs and Flowers (Outdoors only); Pet collars; Nursery stocks (Outdoor use only); Building perimeters (Outdoor use only); and as Apicide.

2) This product may be used to formulate products for specific 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

Do not contaminate water, food or feed by storage and disposal. **PESTICIDE STORAGE:** Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Avoid storage at high temperatures. Do not stack over 2 pallets high. Move containers by handles or cases. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Avoid contamination with acids or alkalies. Store in original containers only. If the contents are leaking or material is spilled, follow these steps:

- 1. Collect and place in suitable containers for disposal.
- 2. Wash area with soap and water to remove remaining pesticide.
- 3. Follow washing with clean water rinse.
- 4. Do not allow runoff to enter sewer or contaminate water supplies.
- 5. Dispose of waste as indicated below:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

Nonrefillable flexible bags—all weights: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (Rigid—Greater than 50 Lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least once complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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STORAGE AND DISPOSAL (Cont.)

Refillable Container: Refillable container. Refill this container with carbaryl only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining content from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the directions for use. To the extent consistent with applicable law, Manufacturer makes no other warranties, express or implied, including FITNESS or MERCHANTABILITY. To the extent consistent with applicable law, in no case shall Manufacturer or the Seller be liable for consequential, special or indirect dames resulting from the use or handling of this product. To the extent consistent with applicable law, the foregoing is a condition of sale by Seller and is accepted as such by the Buyer.