

19713-244

12-15-2009

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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,

A handwritten signature in cursive script that reads "Joanne S. Edwards".

Joanne S. Edwards  
Insecticide-Rodenticide Branch  
Registration Division (7504P)



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 19713-244	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL CARBARYL 80 DUST BASE	PM# 07 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**

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response 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:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) polywoven bag
* 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  
 Label  Container

4. Size(s) Retail Container. 30, 50, 55 LBS.

5. Location of Label Directions  
 On the label

6. Manner in Which Label is Affixed to Product  
 Lithograph Paper glued Stenciled  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 CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4371
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**Certification**  
 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.

2. Signature  
*Luza Chan* 2009.10.30 15:17:03 -05'00'

3. Title  
REGISTRATION MANAGER

4. Typed Name  
LUZ G CHAN

5. Date  
October 30, 2009

6. Date Application Received  
**(Stamped)**

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Drexel

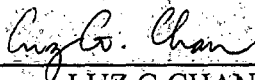
Drexel Chemical Company

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



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LUZ G CHAN

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 (244SP-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](mailto:Lchan@drexchem.com).

Thank you.

Respectfully yours,  
FOR DREXEL CHEMICAL COMPANY

  
Luz G Chan  
Registration Manager

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## 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.

1) 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.

(Continued)

## 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 damages 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.