

19713-285

2/24/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 24 2009

Luz G. Chan
Registration Manager
Drexel Chemical Company
P. O. Box 13327
Memphis, TN 38113-0327

SUBJECT: Application for Pesticide Notification – Changes Based on EPA Letter Dated
January 11, 2007 and Copy of Confidential Statement of Formula (CSF)
Dated October 16, 2006

IDA PROP-A-NEL 4
EPA Reg. No. 19713-285
Application Dated January 18, 2007

Dear Ms. Chan:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

2071



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-285	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IDA PROP-A-NEL 4	PM# 25/Herbicide 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 color and labeling to: EPA Reg. No. _____ Product Name _____	

NOTIFICATION
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Section - II

Amendment - Explain below. Final printed labels in response to Agency letter dated 1/11/2007

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 final label (285SP-0107) and copy of CSF submitted to the Agency on 10/18/2006. The required certification statement is also submitted. 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	Metal Plastic Glass Paper 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	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued 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 CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
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.		6. Date Application Received (Stamped)
2. Signature <i>Luz G Chan</i> Digitally signed by Luz chan DN: cn=Luz chan, c=US, o=Drexel Chemical Co. Date: 2007.01.18 12:13:55 -06'00'	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date January 18, 2007	



Drexel Chemical Company

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made

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January 18, 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

**Re: Submission of Final Label per EPA's Letter dd. January 11, 2007
IDA PROP-A-NEL 4 (EPA Reg. No. 19713-285)**

Herewith:

1. Completed EPA Form 8570-1
2. One (1) copy of the final label (285SP-0107) incorporating 1/11/2007 EPA comments.

I highlighted the changes on page 2 of the label for your easy reference.

✓ Also, enclosed is a copy of Drexel's October 18, 2006 Notification submission updating the Confidential Statement of Formula (CSF) on file with the Agency.

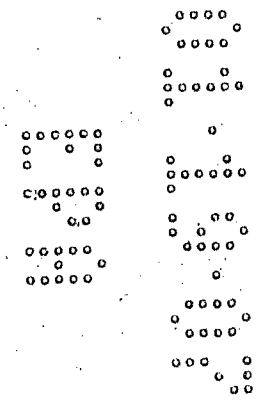
3. Certification statement

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 Chan
Luz Chan
Registration Manager



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NOTIFICATION

FEB 24 2009



Drexel

IDA PROP-A-NEL 4

Herbicide

For Postemergence Control of Broadleaved and Grass Weeds in Rice Fields

ACTIVE INGREDIENT:

Propanil 43.5%

OTHER INGREDIENTS: 56.5%

TOTAL: 100.0%

This product contains 4 pounds of active ingredient per gallon.
This product contains the toxic inert isophorone.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See **FIRST AID** Below

EPA Reg. No. 19713-285

EPA Est. No. _____ Net Contents: _____

FIRST AID
<p>IF SWALLOWED:</p> <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not give anything by mouth to an unconscious or convulsing person. • Do not induce vomiting unless told to do so by a poison control center or doctor.
<p>IF ON SKIN OR CLOTHING:</p> <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of soap and water for 15 to 20 minutes.
<p>IF IN EYES:</p> <ul style="list-style-type: none"> • 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.
<p>IF INHALED:</p> <ul style="list-style-type: none"> • 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.
<p>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.</p>
<p>Note to Physician: May cause chemical pneumonitis if aspirated. If lavage is performed, suggest endotracheal and/or esophagoscopy control.</p>

AGRICULTURAL CHEMICAL

Do not ship or store with food, feeds, drugs, or clothing.

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE CALL TOLL FREE: 1-800-424-9300.



Manufactured By:

Drexel Chemical Company

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

SINCE 1972

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes moderate eye irritation. May cause skin irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are any waterproof material listed below. For more information, follow instructions in Supplement Three of PR Notice 93-7. If you want more options, follow the instructions for category B on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, and other handlers must wear the following, except when removing an unrinsed probe: Long-sleeved shirt and long pants, chemical-resistant gloves, and chemical-resistant apron when mixing/loading, cleaning up spills or equipment, or otherwise exposed to the concentrate, and shoes plus socks.

In addition, handlers must wear chemical resistant footwear when cleaning up spills or equipment.

Mixers, loaders, and other handlers must wear the following when removing an unrinsed probe: Coverall over long-sleeved shirt and long pants, chemical resistant gloves, chemical resistant footwear plus socks, protective eyewear if the system operates under pressure, and chemical resistant apron. See engineering controls for additional requirements.

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

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

ENGINEERING CONTROLS

Mixers and loaders must either:

1. Use a closed system that meets the requirements listed in the Worker Protection Standard (WPS) for dermal protection of agricultural pesticides [40 CFR 170.240(d)(4)]. **OR.**
2. Use the probe system described below.

Probe System

Specific requirements for use of the probe closed mixing/loading system:

- Remove plug from bung of drum containing this product only when drum is sitting on the ground or on a secure level platform, with the bung end of the drum pointed up.
- Do not pour this product from its drum.
- Transfer product from the drum to the mixing tank by use of a suction hose connected at one end to the suction pump on the mixing tank and connected at the other end to a probe (dip tube) that is inserted through the bung opening into the drum.
- Do not handle the probe or bung in a manner that allows dripping or splattering of the product onto yourself or any other person.
- Do not touch the portion of the probe that has been in contact with this product until after the probe has been triple rinsed with water.
- If all of the product is removed from the drum, then triple rinse the probe while it remains inside the drum.

Unrinsed Probes

- If an unrinsed probe must be removed from the drum, then use an anti-drip flange, and immediately transfer the probe into a container of rinse water. The anti-drip flange must be designed to remove excess propanil product from the probe as it is extracted from the drum.
- Take the following steps if the probe must be disconnected from the suction hose before both the probe and the hose have been triple rinsed:
 - equip the probe end of the hose with a shut-off valve,
 - install a dry break coupling between the valve and the probe,
 - close the shut-off valve before disconnecting the probe.

All Transfer Systems

In addition, mixers and loaders using all systems must:

- Wear the personal protective equipment required in the PPE section of this labeling for mixers and loaders.
- Wear protective eyewear, if the system operates under pressure, and

(Continued)

285SP-0107

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ENGINEERING CONTROLS (Con't.)

• When using a system that meets the requirements in the WPS as a closed system or using a probe system when the probe is not removed, chemical-resistant footwear must be provided, be immediately available, and be used in an emergency, such as a broken package, spill, or equipment breakdown.

All systems must be capable of removing the pesticide from the shipping container and transferring it into mixing tanks and/or application equipment. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage.

Human flagging is prohibited. Flagging to support aerial application is limited to use of the Global Positioning System (GPS) or mechanical flaggers.

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

USE SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. 2) Remove clothing/PPE 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 pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water intended for irrigation or domestic purposes.

This product may contaminate water through runoff following rainfall events and by seepage through levees. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours. Levees should be constructed with adequate time prior to chemical application so that they are compacted to reduce seepage and to hold a 3 to 6 inch flood (2001 Mississippi Rice Growers Guide). Other guidance is located at <http://agronomy.ucdavis.edu/ucrice/water/seep.htm> and from the document Closed Rice Water Management Systems: from the National Resource Conservation Service of the USDA. The university of Arkansas Rice Production Book (http://www.uaex.edu/other_areas/publications/html) also provides information concerning levee production.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical prior to flooding may result in shallow groundwater contamination due to cracks in the subsoil of the Rice paddy.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

GENERAL INFORMATION

Several important factors should be taken into account to achieve a high efficiency of selective weed control with this product. These include uniform application, growth stage and weather conditions. To assure uniform application, shake or roll container prior to opening and mix the prescribed amount of product with a sufficient volume of carrier to provide thorough coverage of target area.

Growth stage of weeds is very important. Best results for selective weed control are obtained when most grasses have reached the 1 to 3 leaf stage. Proper field preparation is essential to ascertain a relatively clod free and level surface and to obtain uniform flood levels and growth. Fields may be flushed prior to treatment to produce uniform and vigorous grass germination and growth. Drain water from fields prior to applying product. Higher rates are recommended to control larger grasses or exposed weeds when rice fields are not completely drained. Inspect rice fields regularly to select the correct application time.

Weather conditions must be observed closely. Under cool weather conditions higher rates are required to achieve satisfactory control. Avoid application if rain threatens within 6 to 8 hours, or if wind velocities are high enough to cause drift and irregular spray patterns.

Consult Extension Service for detailed application rate.

WEEDS CONTROLLED

Barnyardgrass (watergrass)	Gulf cockspur
Brachiaris	Mexicanweed
Coffeeweed	Millet (Texas)
Crabgrass	Paragrass
Croton	Pigweed
Curly indigo	Sourdock
Foxtail	Spearhead
Goosegrass	Wiregrass

Note: This product will not control Arrowhead, Bermudagrass, Cattail, Ducksalead, Johnsongrass, Nutgrass, Red rice and Sprangletop.

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.

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, forest, nurseries, and 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 24 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 or made out of any waterproof material, chemical-resistant footwear plus socks, and protective eyewear.

Do not apply when weather conditions favor drift from target area.

SPRAY DRIFT MANAGEMENT:

Avoiding spray drift at the application site is the responsibility of the applicator and the grower. The interactions of many equipment and weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Apply only when the wind speed is less than or equal to 10 mph at the application site.

Apply as a medium or coarser spray (ASAE standard 572).

Additional requirements for ground applications.

Apply using a nozzle height of no more than 4 feet above the ground or crop canopy.

Additional requirements for aerial applications

Do not apply by air if drift can occur to sensitive nontarget crops or plants that are within 100 feet of the application site.

Do not release spray at a height greater than 10 feet above the ground or crop canopy.

The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.

Do not make any type of application into temperature inversions.

When applications are made with a cross-wind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of the application area by adjusting the path of the aircraft upwind.

USE RESTRICTIONS AND PRECAUTIONS

DO NOT apply more than 6 lbs. active ingredient (6 quarts of this product) per acre per application. Do not apply more than 8 lbs. active ingredient (8 quarts of this product) per acre per season.

Application to fields where catfish farming is practiced and draining water from fields into areas where catfish farming is practiced is prohibited.

DO NOT apply this product through any type of irrigation system.

DO NOT apply this product to fields where commercial catfish farming is practiced and do not drain water from treated fields into areas where catfish farming is practiced.

DO NOT apply this product within 60 days of harvest.

DO NOT rotate to crops other than Rice for 60 days following application.

DO NOT apply this product (directly or indirectly) to any crop except Rice.

DO NOT apply when wind conditions will allow drift to adjacent, susceptible crops such as Beans, Soybeans, Cotton, Safflower, Cucurbits, Vegetables, orchards and other sensitive crops.

Water drained from treated Rice fields must not be used to irrigate other crops or be released within 2 miles of a potable water intake in flowing water (i.e., river, stream, etc.) or within 2 miles of a potable water intake in a standing body of water (i.e., lake, pond, or reservoir).

WHERE TO USE

This product is used for postemergence control of broadleaf and grass weeds in RICE fields.

PLANT BACK INTERVAL

Do not plant or transplant crops in the treated area for at least 30 days following an application of this product.

BROADCAST RATE

Apply 3 quarts of this product per acre when most grasses have reached the 1 to 3 leaf stage. Use 4 to 6 quarts of this product per acre when the grasses are large (4 to 6 leaf stage) or when unseasonably cool weather conditions prevail, grass and broadleaf weeds are stressed due to dry conditions, or in cases where Rice fields have not been drained completely and where weeds are large enough. Barnyardgrass may be controlled up to 30 to 45 days after planting, before Rice plants have reached the fully tillered growth stage.

For aerial applications use approximately 20 gallons, and for surface (ground) applications 20 to 30 gallons of carrier per acre at high enough pressure. Agitate tank mixes thoroughly and continuously. Avoid over and under application.

NOTE: Product applied to Rice after the 4 leaf stage may cause visible injury under some climatic conditions. Rice plants usually outgrow such injury.

