

19713-288 5-25-2004

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95

17



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-288	2. EPA Product Manager Marilyn Mautz	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL MALATHION ULV	PM# Insecticide-Rodenticide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company, P.O. Box 13327 MEMPHIS, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION MAY 25 2004
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
 One (1) copy of the label (288SP-0504++) revised per PR Notice 95-1. A copy of 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		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name LUZ G 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 	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date May 17, 2004	

2/17
Drexel

Drexel Chemical Company

May 17, 2004

Submission of Revised Label per PR Notice 95-1
DREXEL MALATHION ULV (EPA Reg. No. 19713-288)

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

NOTIFICATION

MAY 25 2004

MASTER LABEL

Note to EPA
Shading added to denote Mosquito Uses.

3/7



Drexel

Malathion ULV

Insecticide

ACTIVE INGREDIENT:

Malathion	96.5%
OTHER INGREDIENTS:	3.5%
TOTAL:	100.0%

This product contains 9.9 pounds of Malathion per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below
SHAKE WELL BEFORE USING

EPA Reg. No. 19713-288

EPA Est. No. 19713-GA-1

Net Contents: _____

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 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.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

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. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO PHYSICIAN: This product is a cholinesterase inhibitor. Treat symptomatically. Atropine is an antidote.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist. Avoid contact with eyes, skin or clothing. Do not contaminate food or 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 F on an EPA chemical resistance category chart.

Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves such as barrier laminate, butyl rubber, nitrile rubber or viton and shoes plus socks.

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

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 180.240] (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates and aquatic life stages of amphibians. 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. Drift and runoff may be hazardous to aquatic organisms in areas near the application site. Do not contaminate water when disposing of equipment washwaters. This product is highly toxic to bees exposed to direct treatment 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.

PHYSICAL OR CHEMICAL HAZARDS

Before using, read the directions contained on this label for the proper methods and procedures which must be followed to achieve effective insect control and avoid permanent damage to automobile and other paint finishes.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

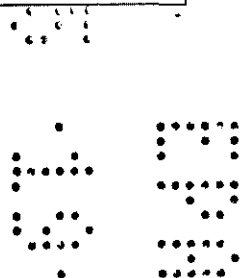
AGRICULTURAL USE REQUIREMENTS

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, 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 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. Do not enter or allow worker entry into treated areas during the REI of 12 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 made of any waterproof material and shoes plus socks.

NOTIFICATION

MAY 25 2004



Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38143-0327

SINCE 1972

-288SP-0504++

4/17

CHEMIGATION PROHIBITION

Do not apply this product through any type of irrigation system.

AGRICULTURAL USES

Do not use this product for any uses other than those specified on this label. MALATHION ULV is used undiluted in specially designed aircraft or ground equipment capable of applying ultra-low volumes for control of the insects indicated.

Aerial applications are most effective when made at a boom height of 5 feet and a swath width of 55 feet. Apply only when weather conditions are favorable. Wind and rising air currents may cause undesirable spray drift and reduce insect control. Mist blowers and boom sprayers utilizing a controlled air flow to facilitate particle size and spray deposition may be used at a vehicle speed of 4 to 10 miles per hour.

Mist blowers with a pump capable of producing up to 40 psi and blower speeds of 2600 rpm are satisfactory. Use flat fan nozzles, 8001 to 8002, placed 30 degrees into air blast or rotary atomizers into the air blast that produce an efficient spray particle with a mass median diameter of 40 to 100 microns. Swath widths should not exceed 30 feet. Apply only when weather conditions are favorable. Wind and rising air currents may cause undesirable spray drift and reduce insect control. Boom sprayers with a filtered rotary air compressor, either PTO or gas engine driven or an air pump capable of producing at least 12 psi are satisfactory. Use air pressure on chemical tanks and an accurate metering valve to assure a calibrated flow of the pesticide. Air should be regulated with relief valve and gauge for proper air and liquid mixture. Pneumatic-type spray nozzles, as suggested by equipment manufacturer, should be used for spray particles with mass median diameter of 30 to 100 microns. Apply only when weather conditions are favorable. Wind and rising air currents may cause undesirable spray drift and reduce insect control. Repeat applications should be made as necessary unless otherwise specified.

IMPORTANT: Undiluted spray droplets of this product will permanently damage automobile paint. Cars should not be sprayed. If accidental exposure does occur, the car should be washed immediately. Consult your State Experiment Station or State Extension Service for proper timing of sprays. This product is highly toxic to bees exposed to direct treatment or residues on crops. Protective information may be obtained from your Cooperative Agricultural Extension Service.

GENERAL USES

Crop	Pests	Rate per Acre	PHI (Days)
Alfalfa	Alfalfa caterpillars	8 fl. ozs.	0
	SPECIFIC DIRECTIONS: Apply when larvae are small.		
	Western yellowstriped armyworms	12 fl. ozs.	5
	SPECIFIC DIRECTIONS: Apply when larvae are large or when foliage is dense.		
	Alfalfa weevil larvae	16 fl. ozs.	5
	SPECIFIC DIRECTIONS: Apply when day temperatures are expected to exceed 65°F and when 50 to 70% of leaves show feeding damage.		
	Beet armyworms	8 fl. ozs.	0
	SPECIFIC DIRECTIONS: Apply when larvae are small.		
	Beet armyworms	16 fl. ozs.	5
	SPECIFIC DIRECTIONS: Apply when larvae are large or when foliage is dense.		
	Grasshoppers	8 fl. ozs.	0
Note: Do not apply to Alfalfa in bloom. Do not apply to seed Alfalfa.			
Beans (Blackeye, Dry, Green, Lima, Navy, Red kidney, Snap, Wax)	Aphids, Asparagus beetles, Green cloverworms, Japanese beetles, Leafhoppers, Lygus bugs, Mexican bean beetles, Pea weevil, Spider mites, Thrips	8 fl. ozs.	1
	SPECIFIC DIRECTIONS: Do not graze or feed foliage, vines/forage, straw/hay.		
Blueberries	Blueberry maggots	10 fl. ozs.	1

Continued

Crop	Pests	Rate per Acre	PHI (Days)
Cherries	Cherry fruit flies	12 to 16 fl. ozs.	1
	SPECIFIC DIRECTIONS: Apply by aircraft only. Use higher rate when foliage is heavy or infestation is severe. Make first application as soon as Flies appear.		
Cereal crop (Barley, Oats, Wheat)	Cereal leaf beetles	4 to 8 fl. ozs.	7
Cereal crop (Corn)	Cereal leaf beetles	4 to 8 fl. ozs.	5
Grasses	Cereal leaf beetles	4 to 8 fl. ozs.	0
Clover, Grass, Grass hay, Pasture and Range grass, Non-agricultural land (Roadsides, Wasteland)	Grasshoppers	8 to 12 fl. ozs.	0
	SPECIFIC DIRECTIONS: Do not apply to Clover in bloom.		
Corn	Adult corn rootworms	4 fl. ozs.	5
Cotton	Early season insects, Fleahoppers, Leafhoppers, Thrips	4 to 8 fl. ozs.	0
	Boil weevils	8 to 16 fl. ozs.	0
	SPECIFIC DIRECTIONS: For early mid-season.		
	Boil weevils	16 fl. ozs.	0
	SPECIFIC DIRECTIONS: For late season.		
	Grasshoppers	8 fl. ozs.	0
	Lygus bugs	8 to 12 fl. ozs.	0
	Lygus bugs	16 fl. ozs.	0
	SPECIFIC DIRECTIONS: For very heavy migrating populations.		
	Note: This product can be used alone in Cotton as a ULV concentrate spray or diluted in once-refined Cotton seed or vegetable oil sufficient to make at least one quart of the finished spray per acre.		
Grain crops (Barley, Corn, Oats, Grain sorghum (Milo), Rice, Rye and Wheat)	Grasshoppers	8 to 12 fl. ozs.	7 (except Corn - 5)
	SPECIFIC DIRECTIONS: Do not graze or feed grain sorghum forage, fodder/stover or hay. For aquatic uses (Rice), broadcast use only over intermittently flooded areas. Application may not be made around bodies of water where fish or shellfish are grown and/or harvested commercially.		
Grain sorghum (Milo)	Sorghum midge	8 to 12 fl. ozs.	7
	SPECIFIC DIRECTIONS: Apply during the bloom stage. Do not graze or feed grain sorghum forage, fodder/stover or hay.		
	Grasshoppers	8 fl. ozs.	7
SPECIFIC DIRECTIONS: Apply during the bloom stage. Do not graze or feed grain sorghum forage, fodder/stover or hay.			
Rice (Grain form) (LA, TX)	Rice stink bugs	8 fl. ozs.	7
SPECIFIC DIRECTIONS: Apply by aircraft only. Apply during early milk and dough stage of growing Rice. Broadcast use only over intermittently flooded areas. Application may not be made around bodies of water where fish or shellfish are grown and/or harvested commercially.			
Non-Agricultural lands	Beet leafhoppers (On wild host plants)	8 fl. ozs.	0

OTHER AGRICULTURAL USES

Alfalfa, Beans, Clover, Grain Crops (Barley, Corn, Oat, Rice, Rye, Sorghum/Milo, and Wheat), Grass and Grass Hay, Non-agricultural Lands (Wasteland), Pasture and Range Grass: **Adult Mosquitos and Flies** — Apply this product at the rate of 2 to 4 fluid ounces for control of adult Mosquitoes and at 6 to 8 fl. ozs. per acre for control of adult Flies and Mosquitoes. Repeat applications as necessary. On Alfalfa, Clover, Pasture and Range grass, Grass and Grass hay, this product may be applied on day of harvest or grazing. Do not apply to Alfalfa and Clover in bloom. Do not use on Seed alfalfa. On Grain crops make no applications within 7 days of harvest or forage use; on Corn, within 5 days of harvest or forage; on Rice, within 7 days of harvest; on Beans within 1 day of harvest. Do not graze or feed Grain sorghum forage, fodder/stover, or hay.

MOSQUITO

(Mosquito control in populated and rural areas)

IMPORTANT NOTICE: To be applied only by the trained personnel of public health organizations, Mosquito abatement districts or pest control operators.

Note For Aquatic Uses: Broadcast use only over intermittently flooded areas. Application may not be made around bodies of water where fish or shellfish are grown and/or harvested commercially.

AERIAL APPLICATION: Adult Mosquito control over cities, towns and other areas where automobiles, trailers, trucks, and pleasure boats are present: Apply 2.6 to 3.0 fluid ounces of this product per acre. Apply only when weather conditions are favorable. Wind and rising air currents may cause undesirable spray drift and reduce insect control. **IMPORTANT:** Undiluted spray droplets of this product will permanently damage vehicle paint finishes unless the aircraft used for the ultra low volume application meets all of the specifications listed below:

FIXED WING AIRCRAFT

1. Aircraft is operated at 150 mph or more.
2. There are no leaks in the ultra-low volume spray system.
3. Nozzles are placed on the boom at a 45 degree angle down and into the wind.
4. Diaphragm check valves are used on all nozzles to ensure positive cut-off of the spray.
5. Dosage of this product does not exceed 3 fluid ounces per acre.
6. The spray system produces droplets of this product in the 50 to 80 Mass Median Diameter (MMD) micron range, with no more than 10% of the droplets exceeding 100-microns, as determined by readings made from microscope slides coated with Dri-Film® or Teflon®.

Helicopter Equipment Specifications:

1. Rotary nozzle equivalent to Beecomist Spray Head Assembly Model No. 350 equipped with:
 - a. a direct reading RPM tachometer or low RPM signal light readily visible to operator;
 - b. a stainless steel porous metal sleeve, 20 micron pore size, dynamically balanced to the nozzle;
 - c. a diaphragm check valve as near to the rotary nozzle as possible to ensure positive cut-off to the spray;
 - d. nozzle on/off switch separate from main switch and pump switch.
2. Minimum no-load nozzle speed of 10,500 RPM.
3. A continuous non-pulsating metered flow must be maintained by a variable speed metering pump equipped with:
 - a. a positive cut-off valve between tank and pump;
 - b. a flow gauge or tachometer visible to operator;
 - c. a pump on/off switch separate from main switch and nozzle switch.
4. Maximum flow rate of 0.5 gallon per minute per nozzle.
5. Rotary nozzle must be mounted behind and below the boom with sleeve directed toward the rear of the aircraft and parallel to the ground during flight. Nozzle must be positioned to minimize air turbulence and the collection of droplets of this product on mounting brackets, feed lines, fittings, etc. or any part of the aircraft.

OPERATING PROCEDURES

1. This product must be pre-filtered through a 10 micron filter prior to transfer into helicopter tank. A 50-mesh stainless steel line strainer must be installed in the pump feed line.
2. Entire system, including tank, pump, nozzle and feed lines, to be used only for application of this product.
3. Entire system must be inspected daily to ensure that there are no leaks.
4. Sleeve must be removed and cleaned immediately after each use by washing with hot water and blowing dry from outside in with clean air.
5. Rotating nozzle must be turned on and operating before turning on pump. For shut-off, pump must be shut off and lines cleaned prior to stopping nozzle rotation.
6. Dosage of this product does not exceed 3 fluid ounces per acre.
7. The spray system must produce droplets of this product with a Mass Median Diameter (MMD) of less than 50 microns, with no more than 2.5% of the droplets exceeding 100 microns, as determined by readings made from microscope slides coated with Dri-Film® or Teflon®.

GROUND APPLICATION

Thermal Aerosols or Fogs: For control of adult Mosquitoes with thermal aerosols or fogs, apply this product at the rate of 6 to 8 fluid ounces actual/gallon (3.9 to 5.2 gallons of this product in 100 gallons finished solution*) by ground equipment delivering 40 gallons per hour at a vehicle speed of 5 miles per hour to treat a swath width of 300 to 400 feet.

*Note: There is a great variation in the chemical composition of fuel oils which may be used as thermal fog solvents. These differences may cause sludge and/or affect the solubility of this product.

Non-Thermal Aerosols (Adult Mosquito Control): For control of adult Mosquitoes over a 300 foot swath with non-thermal aerosols of this product using the following rates at the indicated vehicle speeds:

Vehicle Speed Rate per Hour	Flow Rate of This Product Fl. Ozs. per Minute	Maximum Flow Rate per Hour
5	1.0 to 2.1	1 gallon
10	2.0 to 4.3	2 gallons
15	3.0 to 6.3	3 gallons
20	4.0 to 8.6	4 gallons

ADULT STABLE FLY CONTROL: For control of adult Stable flies over a 300-foot swath with non-thermal aerosols of this product using the ultra-low volume method, use the following flow rates at the indicated vehicle speeds.

Vehicle Speed Rate per Hour	Flow Rate of This Product Fl. Ozs. per Minute	Maximum Flow Rate per Hour
5	2.1	1 gallon
10	4.3	2 gallons

ADULT MOSQUITOES AND FLIES on rangeland, pasture, and other uncultivated non-agricultural areas (wastelands, roadsides). Does not include golf courses.

Apply this product at the rate of 2 to 4 fluid ounces per acre for control of both adult mosquitoes and flies. Application may be made via ground or aerial equipment and may be repeated as necessary.

For enhanced knock-down effects against mosquitoes and flies, this product can be mixed with a synergized pyrethrin emulsifiable concentrate (8% pyrethrum + 80% PBO) in accordance with the most restrictive of label limitations and precautions indicated on both this and the tank-mixed product. No label rates should be exceeded. This product may not be mixed with any product bearing a label which specifically prohibits such mixing. Prior to tank mixing large quantities, mix a small amount in a glass jar to verify that the products are physically compatible.

A tank mix of these may be prepared as follows:

Component	Rapid Knock-Down	Improved Knock-Down
This Product	107 fl. ozs.	117 fl. ozs.
Synergized pyrethrin (6%/60%)	21 fl. ozs.	11 fl. ozs.

Depending upon your operational needs for knock-down, the amount of synergized pyrethrin can be reduced or adjusted. Application rates of this product and droplet distribution requirements remain the same as for this product used alone.

DROPLET SIZE

1. The Mass Median Diameter (MMD) of the droplets should not exceed 17 microns. The MMD is the drop diameter which divides the spray volume into two equal parts; i.e., 50% of the volume are drop sizes below the MMD and 50% are above the MMD.
2. Spray droplets should not exceed 32 microns in size. Three percent of the spray droplets (6 droplets out of 200) can exceed 32 microns providing the MMD does not exceed 17 microns and no droplets exceed a maximum of 48 microns. Larger droplets, when transported by natural air currents, impinge more readily on objects in their pathway and will permanently damage automobile type paints.
3. More than one-half of the total spray mass must consist of droplets in the 6 to 18 micron range to achieve adequate dispersal of insecticide over a 300-foot swath.
4. A minimum of 0.66, preferably 0.8 of the total spray mass must consist of droplets not exceeding 24 microns in range.

OPERATING EQUIPMENT

Each Non-Thermal Aerosol Generator used for dispersal of this product to control adult Mosquitoes must have minimum capability of producing the droplet spectrum described under DROPLET SIZE. The initial determination of droplet size is made after the unit is installed in a vehicle and prior to its use in Mosquito control operations. The unit should be rechecked as frequently as necessary to ensure that proper droplet size is maintained for each operation.

Determination of droplet size every two months is usually sufficient if the unit has been maintained in good operating condition. Equipment manufacturer's instructions setting forth cleaning and maintenance of the unit must be followed. The unit must be inspected before each operation to correct any leaks or obstruction in the spray system, to detect whether the nozzle, hoses or other parts are worn and in need of replacement, to ensure that the flow meter is properly calibrated, and to determine that the pressure recommended by the manufacturer is being maintained.

FLOW RATE: Must be regulated by accurate flow meter — not greater than 1 gallon per hour at 5 mph, or 2 gallons per hour at 10 mph or 3 gallons per hour at 15 mph or 4 gallons per hour at 20 mph.

NOZZLE DIRECTION: Rear of the vehicle — upward at an angle of 45 degrees or more.

VEHICLE SPEED: Not greater than 20 miles per hour — shut off spray equipment when vehicle is stopped.

IMPORTANT: Spray droplets of undiluted product will permanently damage automobile paint unless all the conditions described and recommended in this leaflet are met.

DIRECTIONS FOR DETERMINING THE DROPLET SIZE OF MALATHION ULV (Non-Thermal Aerosols)

Note: - Other methods of determining droplet size may also be used. Such methods must first be validated by the user, to ensure droplet sizes are within label parameters.

Permanent records of each droplet size determination must be kept and made available to Drexel Chemical Company, upon request.

PREPARATION OF SLIDES WITH DRI-FILM: This product's droplet sizes are determined by depositing a sample of the aerosol on a coated glass slide and measuring the droplets under a high-power microscope. Ordinary 3" x 1" glass slides must be coated with silicone (General Electric SC-87 Dri-Film) prior to sampling to prevent excessive spreading

5/17

6/7

or coalescence of the droplets. The slides are dipped into a 10% solution of Dri-Film in toluene, drained and dried at about 200°F for 30 minutes after which they are dipped in acetone, allowed to dry and stored in a tight slide box. Coating solution must be freshly prepared. Do not store coating solution because it will deteriorate. Slides are lightly polished with a soft tissue before using to remove any foreign particles.

DEPOSITION OF DROPLETS OF THIS PRODUCT ON SLIDES: Droplets should be collected under ideal operating conditions to ensure representative samplings of droplets in the aerosol. A sample of this product's aerosol is deposited on a slide by waving the slide as rapidly as possible perpendicular through the aerosol cloud at a distance of 25 feet from the point of discharge.

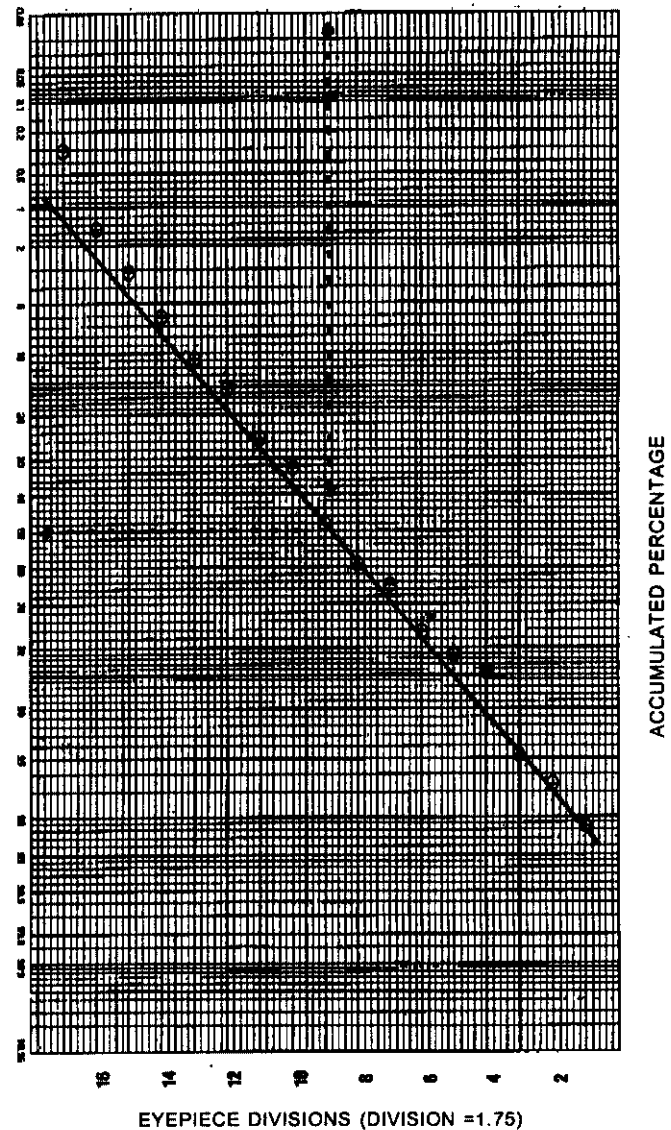
The slide velocity may be increased by attaching it to a 3- or 4-foot stick by means of a spring paper clip. At least two slides should be exposed to ensure an adequate sample. Store slides in a tight slide box for transfer to a location where measurement can be made.

Avoid excessive heat during transit and store in a cool place until measurements can be made. Although label specifications require the aerosol nozzle to be angled upward at 45 degrees or more during operation, it is more convenient to position the nozzle parallel to the ground for droplet sampling. If this is not possible it will be necessary to be positioned at a sufficient height to obtain a representative sample of the aerosol.

DETERMINATION OF DROPLET SIZES FROM THIS PRODUCT: A microscope with a mechanical stage and an eyepiece micrometer are used to determine the size of the individual aerosol droplets. Prior to taking measurements, the divisions of the eyepiece micrometer must be calibrated into microns by means of a stage micrometer. In the example represented in "TABLE 1", droplets were measured at 400x magnification. At that magnification each division of the eyepiece was calibrated to equal 3.5 microns. At least 200 droplets should be measured. Usually this is easily accomplished on one slide. An accurate method is to measure all droplets that pass through the micrometer scale as the slide is moved from one edge to the other by using the mechanical stage. Measurements should be taken along the margins of the slide. It is more convenient to measure in terms of the divisions of the eyepiece micrometer and then convert these divisions into microns. The measurements converted into microns must then be corrected for the amount of spread that occurs on the slides. The spread factor of this product for the silicone-coated slides is 0.5; therefore, in "TABLE 1" each division of the eyepiece actually equals 1.75 microns (3.5 microns times the 0.5 spread factor). The spread factor for Teflon-coated slides is 0.89. The following procedures given for silicone-coated slides, would be the same for Teflon-coated slides once the value for each eyepiece division has been determined. The measurements are tabulated and processed as in "TABLE 1". The Maximum Diameter is calculated by converting the diameter of the largest droplet measured into microns. In "TABLE 1", the largest droplet measured has a diameter of 19 eyepiece divisions. Therefore, the Maximum Diameter is 33.3 microns (19 x 1.75 = 33.3). To determine the Mass Median Diameter (MMD), the accumulative percentages from the largest column in "TABLE 1" are plotted against the eyepiece division (D) on arithmetic probability paper as in "Figure 1". Directly across from the 50% point on the line is the median droplet size in eyepiece divisions which must be converted to microns. In "Figure 1", 9.2 eyepiece divisions times the conversion factor of 1.75 equals a Mass Median Diameter of 16.1 microns.

Figure 1

Percentage of the total volume of aerosol samples below each stated droplet size (from Table 1). The Mass Median Diameter is determined from the 50 percent point on the line. The Mass Median Diameter (MMD) = 9.2 divisions times 1.75 = 16.1 microns.



Eyepiece Divisions (D)	Number of Droplets (N)	D X N	% of Total D X N (D X N)	Accumulative Percentages
1	5	5	0.31	0.31
2	10	20	1.22	1.53
3	9	27	1.65	3.18
4	12	48	2.93	6.11
5	15	75	4.58	10.69
6	12	72	4.40	15.09
7	25	175	10.70	25.79
8	14	112	6.85	32.64
9	28	252	15.40	48.04
10	19	190	11.81	59.85
11	14	154	9.41	69.06
12	10	120	7.33	76.39
13	6	78	4.77	81.16
14	4	58	3.42	84.58
15	11	165	10.09	94.67
16	2	32	1.98	96.63
18	2	36	2.20	98.83
19	1	19	1.16	99.99
TOTAL	199	1636		

*Measurements were taken at 400 X magnification. Each eyepiece division equals 1.75 microns (3.5 microns times the 0.5 spread factor).
Also for use in accordance with the recommendations and instructions issued by the United States Department of Agriculture for quarantine programs. To be used only by or under the direction of Federal/State personnel for quarantine treatment.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.
PESTICIDE STORAGE: This product should be stored at temperatures not exceeding 25°C (77°F). It should never be heated above 55°C (131°F) and also local heating above this temperature should be avoided.
PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or incineration, or, if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

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 Seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith. In no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.



Drexel Chemical Company

May 17, 2004

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm 266A, Crystal Mall 2
1921 Jefferson Davis Hwy.
Arlington, VA 22202

**Re: Submission of Revised Label by Notification per PR Notice 95-1
DREXEL MALATHION ULV (EPA Reg. No. 19713-288)**

Herewith:

1. Completed EPA Form 8570-1.
2. One (1) copy of the revised label (288SP-0504++). The following change was made on the label:
 - i) In the Environmental Hazards section, the paragraph, "Note: Add this statement to all container sizes.....Office of the EPA." was deleted. Per PR Notice 95-1, this only applies to end-use products registered for industrial preservative, water treatment, other industrial processing uses and commercial and institutional uses.
3. Certification Statement

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

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY


Luz G Chan
Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327
Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: info@drexchem.com • www.DrexChem.com

SINCE 1972

