

19713-301 6-30-2004

 <p>United States Environmental Protection Agency Washington, DC 20460</p>	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number _____
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Application for Pesticide - Section I

1. Company/Product Number 19713-301	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL KOP-HYDROXIDE	PM# 22/Fungicide 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 type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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NOTIFICATION
JUN 30 2004

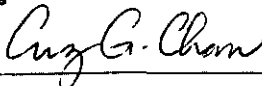
Explanation: Use additional page(s) if necessary. (For section I and Section II.)

One (1) copy of the revised label (301SP-0604++) is submitted for your record and file. Details of the changes are on the cover letter accompanying this submission. 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 <input type="checkbox"/> 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 <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

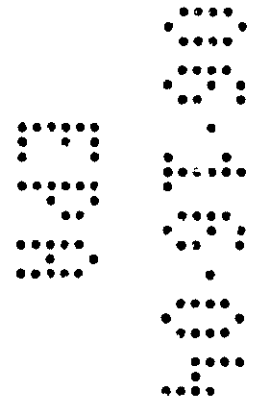
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form 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 June 14, 2004	



Drexel Chemical Company

2/7
NOTIFICATION
JUN 3 0 2004

May 27, 2004



Submission of Revised Label per PR Notice 98-10
DREXEL KOP-HYDROXIDE (EPA Reg. No. 19713-301)

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

JUN 30 2004



KOP - Hydroxide

A Flowable Fungicide

ACTIVE INGREDIENT:

Cupric hydroxide*	37.5%
OTHER INGREDIENTS:	62.5%
TOTAL:	100.0%

*Metallic copper equivalent is 24.4%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

**See FIRST AID Below
SHAKE WELL BEFORE USING**

EPA Reg. No. 19713-301

EPA Est. No. 19713-GA-1

Net Contents: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Do not give any liquid to the person.
- 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through the skin. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

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 A on an EPA chemical-resistance selection chart.

Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride, shoes plus socks, protective eyewear and dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C) or a NIOSH approved respirator with any R, P or HE filter.

(Continued)

PRECAUTIONARY STATEMENTS (Con't.)

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.

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 product is toxic to fish and aquatic organisms. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean highwater mark. Drift and runoff from treated areas may be hazardous to fish and aquatic organisms in adjacent aquatic sites. Do not allow rinsate from cleaning of equipment to enter surface or ground water.

CHEMIGATION INFORMATION

Apply this product only through sprinkler irrigation system(s), including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set or hand move. 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 systems) 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.

RECOMMENDATIONS

Keep agitator running in supply tank during irrigation operations. Apply continuously for the duration of the water application.

Mixing instructions for dilution of pesticide in supply tank: Pour label-recommended amount of this product on surface of water in nearly filled mixing tank or pre-mix in a bucket before pouring into mixing tank. Keep agitator running during filling. Do not allow mixture to stand in irrigation equipment. This product is corrosive and equipment should be cleaned thoroughly after each day's spraying.

POSTING

Posting of areas to be chemigated is required when: 1) Any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, day care centers, hospitals, in-patient clinics, nursing homes or any public areas such as schools, parks, playgrounds or other public facilities not including public roads, or 2) When the chemigated area is open to the public, such as golf courses or retail greenhouses.

Manufactured By:

Drexel Chemical Company

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

SINCE 1972



Posting must conform to the following requirements: Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The printed side of the sign should face away from the treated area towards the sensitive area. The signs shall be printed in English. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2.5 inches tall, and all letters and the symbol shall be a color which sharply contrasts with their immediate background. At the top of the sign shall be the words KEEP OUT, followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word STOP. Below the symbol shall be the words PESTICIDES IN IRRIGATION WATER.

SPRINKLER CHEMIGATION

General Instructions

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 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.

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 regulations.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 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), restricted entry interval (REI) and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard 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 such as polyethylene or polyvinyl chloride, shoes plus socks and protective eyewear.

An eye-flush container, designed specifically for flushing eyes, must be available at the WPS decontamination site for workers entering the area treated with copper hydroxide.

Notify workers of the application by warning them orally that residues in the treated areas may be highly irritating to their eyes and to take precautions such as refraining from rubbing their eyes and if they get residues in their eyes they should immediately flush their eyes using a eye-flush container.

SPRAY DRIFT MANAGEMENT

Avoiding spray at the application site is the responsibility of the applicator. The interaction 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.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops.

1. The distance of the outermost nozzles on the boom must not exceed three-fourths the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the **Aerial Drift Reduction Advisory Information** section that follows.

Aerial Drift Reduction Advisory Information

Information on Droplet Size

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

Controlling Droplet Size

- Volume - Use high flow rate nozzles to apply the highest practical spray volume. Use nozzles with higher flow rates produce larger droplets.
- Pressure - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types, lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- Number of nozzles - Use the minimum number of nozzles that provide uniform coverage.
- Nozzle Orientation - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length

For some use patterns, reducing the effective boom length to less than three-fourths of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height

Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

Wind

Drift potential is lowest between speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential.

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas

This pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive area).

Use this product as noted below. This product is adaptable to spraying from all types of spray equipment. Depending on the equipment used and the specific crop, the volume applied per acre will differ. For dilute, high volume sprays, use from 25 to 100 gallons of water per acre for most vegetable crops, 400 to 800 gallons per acre for fruit orchards and up to 1,500 gallons per acre as may be required for large citrus groves. For concentrate ground sprays, apply from 5 to 20 gallons per acre for most vegetable crops and 25 to 100 gallons per acre for fruit and nut crops. For aerial spraying, 3 to 15 gallons per acre are commonly used. No additional surfactants are needed. Add this product slowly to a spray tank partially filled with water. Spreader-stickers, insecticides, nutrients, etc. should be added last. Observe all cautions and limitations on label of all products used in mixtures. The following specific instructions are based on general applications. The recommendations of the State Agricultural Extension Services should be closely followed as to timing, frequency and number of sprays per season.

ALFALFA: *Cercospora* and *Leptosphaerulina* leaf spots — Apply at 2.7 pints per acre 10 to 14 days before each harvest or earlier if disease threatens. Apply with ground or aerial equipment. Spray injury may occur with sensitive varieties such as Lahontan.

ALMONDS: *Coryneum* blight (Shot hole), Blossom brown rot — Use 2.7 to 4 pints of this product per 100 gallons of water (300 to 400 gallons per acre) in late dormant before foliage buds swell if frequent rainfall occurs. A second application should be made during the early bloom stage (popcorn). To avoid plant injury, do not use above rate after full bloom.

Bacterial blast (*Pseudomonas*) — Use 4 to 5.3 pints of this product per 100 gallons at dormant to early pink bud. For Blast control in sprinkler irrigated orchards or where disease is severe, apply 2 to 4 sprays of this product at one-third pint per 100 gallons at 2-week post-bloom intervals or just before sprinkling. Slight leaf injury may occur from post-bloom spray.

APPLE: Anthracnose, European canker, *Pseudomonas syringae* — Apply before Fall rains at 4 to 5.3 pints per 100 gallons (300 to 400 gallons per acre). Use on yellow varieties may cause discoloration. To avoid, pick before spraying. Fireblight — Apply at 2.7 to 5.3 pints per 100 gallons of water as a full cover spray. Make application between silver tip and green-tip.

Note: Phytotoxicity may occur from late application. (Discontinue use when green-tip is one-half inch.)

Crown or Collar rot (*Phytophthora cactorum*) — Mix 5.3 pints in 100 gallons of water. Apply 4 gallons of suspension as a drench on the lower trunk area of each tree. Apply either in early Spring or in Fall after harvest each year. Do not use if soil pH is below 5.5 or copper toxicity may result. (EXCEPT CA.)

APRICOTS: Blossom brown rot, *Coryneum* blight (Shot hole) — Apply at popcorn to full bloom using 2.7 to 4 pints per 100 gallons (300 to 400 gallons per acre). To avoid spray injury, do not apply after bloom.

AVOCADOS: Scab — Apply when bloom buds begin to swell at 2.7 pints of this product per 100 gallons or 10.7 to 13.3 pints per acre depending on equipment. Continue application at monthly intervals for 5 to 6 applications. Follow recommendations of State Agricultural Experiment Stations.

BANANAS: Sigatoka — Apply by air at 2.7 pints per acre in 3 gallons of water containing one-half gallon of agricultural oil. Apply on a 14 day schedule throughout the wet season. Apply at 21 day intervals during dry periods.

Black pitting — Apply at 5.3 pints per 100 gallons directly to the fruit stem and include the basal portion of the leaf crown. Apply during the first and second weeks after emergence.

BEANS: Bacterial blight (Halo and Common) — For protective sprays, apply first application when plants are six inches high. Apply on 7 to 14 day schedule depending on local conditions. Use 1.3 to 4 pints per acre, depending on disease severity.

BLACKBERRIES (Auroras, Boysens, Cascades, Chehalems, Logans, Marlons, Santiams, Thornless evergreens): Leaf and Cane spot — Apply delayed dormant spray after training in Spring at 5.3 pints plus 1 quart of superior-type oil per 100 gallons. Apply again in late Spring at 2.7 pints plus 1 quart of superior-type oil per 100 gallons. Make full spray application after harvest using 5.3 pints plus 1 quart of superior-type oil per 100 gallons.

BROCCOLI, BRUSSELS SPROUTS, CABBAGE, CAULIFLOWER: Downy mildew — Apply 0.7 to 1.3 pints in a minimum of 25 gallons per acre at 7 day intervals. (Cabbage Only). Black leaf spot (*Alternaria*), Black rot (*Xanthomonas*) — Apply at 2.7 pints per acre in a minimum of 25 gallons per acre at 7 to 10 day intervals.

Note: A slight reddening of older leaves may occur on Broccoli and a slight flecking of wrapper leaves may occur on Cabbage at the 2.7 pints rate. For control of diseases of these crops, begin applications after transplants are set in the field or shortly after emergence of field-seeded crops or when conditions favor disease development.

CACAO: Black pod — Begin applications at the start of the rainy season and continue while infection conditions persist. Sprays should be made as often as 14 to 21 days in high rainfall areas at varying rates from 2.7 to 6 pints per acre, depending on disease severity. For drier areas, where 2 to 4 applications are recommended during critical infection periods and at long intervals, use 8.7 to 11.3 pints per acre, according to disease incidence and planting density.

CANTALOUPEs, HONEYDEWS, MUSKMELONS: Downy mildew — Apply weekly at 2.7 pints per acre before disease appears.

CARROTS: Carrot blight (*Cercospora*) — When disease threatens, apply 2.7 pints per acre at 7 to 14 day intervals, depending on disease severity.

CELERY: Early, Late and Bacterial blights — Apply as soon as plants are first established in the field at 2.7 pints per acre, then every 5 to 7 days depending on severity and weather. One to two quarts of a suitable agricultural spray oil per acre may be used as spreader-sticker.

CHERRY: *Coryneum* blight (Shot hole), Dead bud (*Pseudomonas syringae*) — Apply 8 pints plus 1 pint of superior-type oil per 100 gallons in October (before heavy Fall rains) and again in January, in orchards where the disease is severe, a spray should also be applied in August.

Brown rot blossom blight — For adequate control apply 2.7 to 4 pints per 100 gallons as a full cover spray at popcorn and full bloom.

CITRUS: Greasy spot, Melanose, Pink pitting, Scab — Apply as pre-bloom and post-bloom sprays. Use 1 to 2 pints of this product per 100 gallons, depending on disease severity. May be used in concentrate sprays at equivalent rates. For aerial application, use 8 pints of this product per 100 gallons per acre. Brown rot — Use 0.7 to 1.7 pints per 100 gallons as dilute spray or at equivalent rate as concentrate spray, depending on severity of disease. Begin application in Fall before or just after first heavy rains. Apply to skirts of trees to a height of at least 4 feet. Apply also to bare ground one foot beyond skirt.

CA ONLY: In areas subject to copper injury, add 0.3 to 1 pound of high quality lime per 1.3 pints of this product.

COFFEE: Iron spot (*Cercospora coffeicola*), Pink disease (*Corticium salmonicolor*) — Apply at 2.7 pints per acre as a concentrate or dilute spray. Begin treatment at start of wet season and continue at monthly intervals for three applications. Leaf rust (Brazil) — Apply 4.7 to 7.3 pints per acre for average density plantations. High density plantations may require 9.3 to 10.7 pints per acre. Make application from September to March depending on altitude and local recommendations. Apply 3 to 4 week intervals, depending on disease severity and rainfall conditions.

CRANBERRY: Fruit rot — Apply at 10.7 pints per acre beginning in late bloom. One or two additional applications made at 10 to 14 day intervals may be required, depending on disease pressure. Follow the advice of the State Agricultural Extension Service.

CUCUMBERS: Angular leaf spot, Downy mildew — Apply weekly once the plants begin to vine. Use 2 to 2.7 pints per acre.

CURRENTS, GOOSEBERRY: Leaf spot — Make three applications of this product at 13.3 pints per acre starting after harvest, before bloom and after petal fall.

EGGPLANT: *Alternaria* blight, Anthracnose, Phomopsis — Use 2.7 pints of this product per acre before disease appears. Repeat at 7 to 10 day intervals. (EXCEPT CA.)

FILBERTS: Bacterial blight — Apply 5.3 to 8 pints plus 1 pint of superior-type oil per 100 gallons in late August or early September. In seasons of heavy rainfall, apply another spray when three-fourths of the leaves have dropped.

GRAPES: Black rot, Downy mildew, Powdery mildew — Apply 2.7 pints of this product plus 2 to 6 pounds of hydrated lime per acre as a dilute or concentrate spray. Use this product for the last one or two late Summer applications following early season application of another fungicide. Follow State schedule for exact timing.

Note: Slight to severe foliage injury may occur on copper-sensitive varieties such as Concord, Delaware, Niagara and Rosette.

HOPS: Downy mildew — Apply 2.7 pints as a fungicide crown treatment (after pruning, but before training) as needed. After training, additional fungicide treatments are needed at about 10 day intervals. Discontinue use 2 weeks before harvest.

LETTUCE: Downy mildew — Apply 1.3 to 2.7 pints of this product per acre. Begin treatment when disease first appears and repeat every 7 to 10 days as needed to suppress disease.

LIVE OAK: Ball moss (TX Only) — Apply at 8 pints per 100 gallons of water in Spring after heavy rain, using 1.5 gallons of spray per foot of tree height. Make sure to wet tufts thoroughly. A second application may be required after 12 months.

MANGO: Anthracnose (FL) — Apply monthly after fruit set until harvest at 2.7 pints of this product per 100 gallons or 10.7 to 13.3 pints per acre depending on equipment. Consult Extension Service for State recommendations.

OLIVES: Peacock spot (CA) — Make first application at 2.7 to 4 pints per 100 gallons or at 10.7 to 16 pints per acre, depending on equipment, before Winter rains fall. A second application in early Spring should be made if disease is severe.

ONION: Downy mildew, Purple blotch — Apply 2.7 pints of this product per acre when plants are 4 to 6 inches high and repeat at 7 to 10 day intervals.

PEACHES, NECTARINES: *Coryneum* blight (Shot hole), Leaf curl — **Dormant application:** Apply at leaf fall. **Dilute:** Apply 2.7 to 5.3 pints per 100 gallons (minimum of 10.7 pints per acre). Use 21.3 pints per acre when rainfall is very heavy and disease pressure is high. **Concentrate:** Apply at equivalent rates in approximately 100 gallons of water. May be used with agricultural spray oil. Blossom blight, Brown rot — Apply at 2.7 to 4 pints per 100 gallons as full cover spray at pink bud. (Application at this time also affords some control of *Coryneum* blight and Leaf curl). Bacterial spot — **Dormant application:** Apply at 2.7 pints per 100 gallons. Post-bloom, apply 0.3 pint per

100 gallons at first and second cover sprays. Do not spray later than three weeks prior to harvest. Do not use at rates above those recommended.

Note: Slight defoliation and spotting of leaves may occur from use in cover sprays.

PEANUTS: Cercospora leaf spot — Begin spraying 40 to 45 days after planting or when disease symptoms appear. Make ground or aerial application at 2 to 4 pints per acre. For aerial application, use 3 to 10 gallons of water. Continue applications at 10 to 14 day intervals. Use sufficient water to get adequate coverage. This product may be tank-mixed with flowable sulfur products.

PEARS: Fire blight — Apply at one-third pint per 100 gallons or 1.3 pints per acre at 5 day intervals throughout bloom period. *Pseudomonas* blight — Apply this product before Fall rains at a rate of 4 to 5.3 pints per 100 gallons (300 to 400 gallons per acre) and again at dormant before Spring growth starts. Excessive dosages may cause Fruit russet.

PEAS: Powdery mildew — Begin spray treatment when disease symptoms first appear. Use at 2 to 4 pints per acre according to disease severity. Repeat applications at weekly intervals.

PEPPERS: Bacterial spot — When disease threatens, apply 2.7 to 4 pints per acre in sufficient water for adequate coverage at 7 to 14 day intervals, depending on disease severity.

PHILODENDRON: Bacterial leaf spot — Apply weekly before disease appears at 2 pints of this product plus manufacturer's recommended amount of mancozeb per 100 gallons of water.

POTATOES: Early and Late blight — Apply at 7 to 10 day intervals starting when plants are six inches high until two weeks before harvest. Use 1.3 to 2 pints per acre in those locations where disease is light and up to 4 to 5.3 pints per acre where disease is more severe.

PUMPKIN, SQUASH: Powdery mildew — Begin applications when plants are 3 weeks old or when first disease symptoms appear. Use at weekly intervals at 2 to 4 pints per acre, depending on disease severity.

STRAWBERRIES: Leaf blight, Leaf spot — Apply at 2.7 to 4 pints in 100 gallons per acre. Begin application when plants are established and continue on a weekly schedule throughout season. Discontinue applications if signs of phytotoxicity appear.

SUGAR BEETS: Cercospora leaf spot — Start spray when disease threatens and continue 4 to 5 applications. Spray at 10 to 14 day intervals, depending on weather conditions, at 2.7 to 6.7 pints per acre, depending on disease severity. Addition of suitable agricultural spray oil is recommended at 2 quarts per acre.

SYCAMORE: Anthracnose — Make two applications using 2.3 to 4 pints per 100 gallons as a full cover spray. Make first application at bud crack and second application 7 to 14 days later at 10% leaf expansion.

TOMATOES: Early blight — When disease threatens apply 2.7 to 4 pints per acre at 7 to 10 day intervals. Bacterial speck — Apply at 2.7 pints per acre at 10 to 30 day intervals beginning when the disease threatens. Use more frequent applications when disease pressure is high. Bacterial spot — When disease threatens apply 2.7 to 5.3 pints per acre at 7 to 10 day intervals, more frequently when disease is severe. This product may be combined with maneb or mancozeb. Do not apply within five days of harvest.

6/7
WALNUT: Walnut blight — Apply first spray at early pre-bloom when catkins are partially expanded. Make three additional applications during bloom and early nutlet stages at 7 to 10 day intervals. Additional applications may be necessary when frequent rainfall occurs. **Dilute:** Apply 2.7 pints per 100 gallons of water (minimum of 10.7 pints per acre). **Concentrate:** Apply at equivalent rates in 50 to 100 gallons water per acre. One pint of Summer oil emulsion may be added per 100 gallons of spray. Do not apply more than 16.7 pints per acre per application.

WATERMELON: Anthracnose, Downy mildew — Apply as soon as plants become established and at weekly intervals thereafter. **Anthracnose** — Use at 2.7 pints per acre. Downy mildew — Use at 2 to 4 pints per acre according to disease severity.

WHEAT, BARLEY: Helminthosporium spot blotch, *Septoria* leaf blotch — Apply 2 to 2.7 pints per acre. Make first application at early boot stage and follow with second application at early head stage.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store unused product in original container only in cool, dry area out of reach of children and animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at 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 by incineration if allowed by State and Local authorities. If burned, stay out of smoke.

WARRANTY—CONDITIONS OF SALE

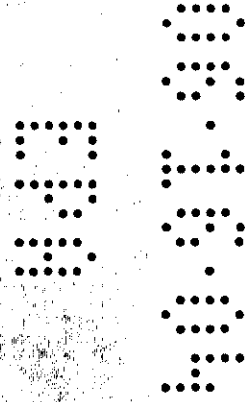
OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond 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

June 14, 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 and Others
DREXEL KOP-HYDROXIDE (EPA Reg. No. 19713-301)**

Herewith:

1. Completed EPA Form 8570-1.
2. One (1) copy of the revised label (301SP-0604++). The following changes ^{were} 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.
 - ii) Under Spray Drift Management, "downward" was corrected to "downwind" under the subheading "Swath Adjustment."
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