

19713-306

01/14/2010

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Luz G. Chan  
Product Registration  
Drexel Chemical Company  
P.O. Box 13327  
Memphis, TN 38113-9327

JAN 14 2010

Subject: Label Notification for Pesticide Registration Notice 2007-4  
(Storage & Disposal Changes)

Dear Registrant:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated October 28, 2009 for:

**EPA Reg. 19713-306 "DREXEL THERMO FOG"**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

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



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

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 19713-306	2. EPA Product Manager Kimberly Nesci	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL THERMO FOG	PM# 11/Insecticide 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 <u>3/25/2009</u>
<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.

**NOTIFICATION**  
JAN 14 2010

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

Submission of revised label (306SP-0709\*) incorporating EPA's comments and revision on the container disposal statement per PR Notice 2007-4.  
 Thank you.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5, 10, 15, 30, 55, 265 GAL.		5. Location of Label Directions <input type="checkbox"/> On the container	
6. Manner in Which Label is Affixed to Product <input checked="" 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	
<p align="center"><b>Certification</b></p> <p>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.</p>					<p align="center">6. Date Application Received (Stamped)</p>
2. Signature <i>Luza Chan</i> 2009.10.28 13:39:06 -05'00'		3. Title REGISTRATION MANAGER			
4. Typed Name LUZ G CHAN		5. Date October 28, 2009			



**Drexel Chemical Company**

October 28, 2009

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

**Re: Submission of Label per EPA Stamped Accepted Label dd. March 25, 2009  
DREXEL THERMO FOG (EPA Reg. No. 19713-306)**

Herewith:

- 1. Completed EPA Form 8570-1
- 2. One (1) copy of the label revised according to the comments by EPA on March 25, 2009.

Also, in the container disposal under the refillable container, "this product" was changed to "pesticide".

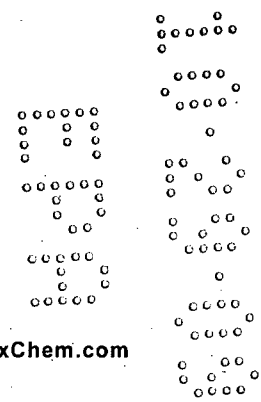
I highlighted the changes for easy reference.

- 3. Certification Statements

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail [Lchan@drexchem.com](mailto:Lchan@drexchem.com). Thank you.

Respectfully yours,  
FOR DREXEL CHEMICAL COMPANY

*Luz G Chan*  
Luz G Chan  
Registration Manager





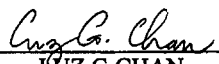
**Drexel Chemical Company**

October 28, 2009

***Submission of Revised Label per PR Notice 2007-4***  
**DREXEL Thermo Fog (EPA Reg. No. 19713-306)**

This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA Regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, and 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

FOR DREXEL CHEMICAL COMPANY



LUZ G CHAN  
Registration Manager

5/7



NOTIFICATION

JAN 14 2010

# Thermo Fog

FOR AGRICULTURAL/COMMERCIAL USE ONLY.

Ready To Use

For control of flies, gnats, and mosquitoes.

For use on cattle, goats, horses, sheep, and swine.

**ACTIVE INGREDIENTS:**

Dichlorvos (2,2-dichlorovinyl dimethyl phosphate) .....	0.98%*
Related Compounds .....	0.02%*
<b>OTHER INGREDIENTS**:</b> .....	99.00%
<b>TOTAL:</b> .....	100.00%

\*Equivalent to 1% Dichlorvos.

\*\*Contains petroleum distillates.

## KEEP OUT OF REACH OF CHILDREN WARNING / AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See **FIRST AID** Below

EPA Reg. No. 19713-306

EPA Est. No. 19713-XX-XXX

Net Content: \_\_\_\_\_

FIRST AID
<p><b>IF SWALLOWED:</b></p> <ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not give any liquid to the person.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious or convulsing person.</li> </ul>
<p><b>IF INHALED:</b></p> <ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<p><b>IF ON SKIN OR CLOTHING:</b></p> <ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p><b>IF IN EYES:</b></p> <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product container or label with you when calling poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.</p>

(Continued)

(Cont.)

**NOTE TO PHYSICIAN:** Contains an organophosphate that inhibits cholinesterase. Contains petroleum distillate – vomiting may cause aspiration pneumonia.

**POISONING SYMPTOMS:** Symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive, pin-point pupils, salivation, sweating, nausea, vomiting, diarrhea and abdominal cramps.

**TREATMENT:** Atropine is the specific therapeutic antagonist of choice against parasympathetic nervous stimulation. If there are signs of parasympathetic stimulation, Atropine Sulfate should be injected at 10 minute intervals, in doses of 1 to 2 milligrams, until complete atropinization has occurred. Pralidoxime chloride (2-PAM) may also be used as an effective antidote in addition to and while maintaining full atropinization. In adults, initial dose of 1 gram of 2-PAM should be injected, preferably as an infusion in 250 cc of saline over a 15 to 30 minute period. If this is not practical, 2-PAM may be administered slowly by intravenous injection as a 5 percent solution in water over not less than two minutes. After about an hour, a second dose of 1 gram of 2-PAM will be indicated if muscle weakness has not been relieved. For infants and children, the dose of 2-PAM is 0.25 gram. Morphine is an improper treatment.

Clear chest by postural drainage. Oxygen administration may be necessary. Observe patient continuously for 48 hours. Repeated exposure to cholinesterase inhibitors may, without warning, cause prolonged susceptibility to very small doses of cholinesterase inhibitor. Allow no further exposure until cholinesterase regeneration has been attained, as determined by blood test.

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**WARNING:** May be fatal if swallowed, inhaled, or absorbed through the skin or eyes. Rapidly absorbed through skin and eyes. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wash thoroughly with soap and water after handling and before eating or smoking. Do not contaminate feed, water foodstuffs, milk or milking utensils.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are butyl (≥ 14 mils) or nitrile rubber. If you want more options, follow the instructions for category C on an EPA chemical-resistance category selection chart.

#### Mixers, loaders, applicators and other handlers must wear:

Long-sleeve shirt, long pants, shoes and socks, and chemical-resistant gloves, a NIOSH-approved respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC 23C) or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or, an organic-vapor removing cartridge or canister with any N, R, P, or HE prefilter.

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

**USER 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 product is toxic to fish, birds and aquatic invertebrates. Do not apply directly to water, 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 wash-waters or rinsate.

**PHYSICAL HAZARDS**

Do not use or store near heat or open flame.

**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 handlers wearing specified PPE may be in the area during application.

**USE PRECAUTIONS AND RESTRICTIONS**

Do not contaminate water or foodstuffs. Do not contaminate milk or milk equipment. Do not apply in areas where animals have received direct application of DDVP within eight (8) hours. Care should be taken that the spray does not come in direct contact with the lactating dairy cow's teats unless they are washed with an approved cleansing solution and dried before milking. Brahman and Brahman cross cattle should not be treated, as they may show hypersensitivity to organophosphates. Do not apply to calves under six months of age. Do not contaminate food crops.

In California: A 24-hour reentry interval is required following the use of this product in warehouses, farm/animal buildings and other enclosed spaces.

**Prohibitions:**

- Use in handheld fogger or handheld smoke generator equipment is prohibited.
- Use in residential sites is prohibited.
- Use on lawns, turf or ornamentals is prohibited.

**APPLICATIONS**

**Do not make direct application to livestock more frequently than once per day.**

**LIVESTOCK** (Beef and Dairy Cattle, Goats, Horses, Sheep and Swine): To control Horn flies, Houseflies, Stable flies, Face flies – Apply one (1) or two (2) fluid ounces of this product per animal as a mist spray daily with hand or automatic sprayer. Use lower rates for smaller animals. Apply spray so as to wet hair. Cover the animal with spray with particular attention to the back, flanks, legs and shoulders. Do not use in excess of two (2) fluid ounces per adult animal. Apply proportionately less to smaller animals. Do not soak the skin or wet the hides.

**FOGGING OUTDOORS:** To control Flies, Gnats and Mosquitoes – Use in areas around farm buildings (farmyards); manure treatments on farm premises; dairy and farm premises; feed lots, including around feed lots, stockyards, corrals, holding pens, and fences; animal buildings including barns, feeding areas, shelters and stables, dairy barns (including milk rooms, equipment and barnyards); livestock feeding areas, pens; poultry droppings, poultry houses (equipment and yards). Outdoor fogging with this product should be limited to use by or under the direction of trained personnel. Apply five (5) to ten (10) pints per acre (0.05 to 0.1 pound of actual dichlorvos) as a dense fog when wind is calm. Do not contaminate food crops. Avoid wetting foliage, as plant injury may occur. Do not use this solution for fogging areas where animals have received direct application within eight (8) hours.

**FOGGING INDOORS:** To control Flies, Gnats and Mosquitoes – Indoor fogging in animal buildings (Horse barns, Dairy barns, Shelters, Stables, Milk rooms, and Poultry houses). Use one pint per 8,000 cubic feet. Do not use this solution for fogging areas where animals have received direct application within eight (8) hours. Do not contaminate water, feed or foodstuffs, milk or milking utensils. Before applying, reduce air movement as much as possible by closing doors, windows and other openings. Eliminate ignition sources such as pilot lights, fires and open flames. Disconnect electrical power. Fog for one (1) to five (5) seconds per 1,000 cubic feet, but use no more than one gallon per 64,000 cubic feet. Do not fog into or near an open flame.

Occupants should vacate premises before treatment and should not reoccupy the premises until it has been ventilated. Leave treated area closed for at least 15 to 30 minutes and then open windows and door to ventilate. Ventilate for at least 1 hour. Apply as necessary, but not more than once per day.

**ANIMAL BUILDINGS (Horse barns, Dairy barns, Shelters, Stables, Milk sheds, Poultry houses):** To control Flies, Gnats, Mosquitoes, Roaches, Fleas, Ants, Sowbugs, Brown dog ticks, Spiders and Silverfish – Apply as a coarse wet spray using one (1) pint per 1,000 square feet. Spiders and Silverfish – Apply as a coarse wet spray using one (1) pint per 1,000 square feet. Treat around doorways, feed storage rooms, alleyways and windowsills. For control of Fly Maggots in maggot breeding areas, apply at the rate of one (1) to two (2) pints per 100 square feet.

**OUTDOOR AREAS SUCH AS FARM PREMISES, FEEDLOTS AND STOCKYARDS:** To control Flies, Gnats, Mosquitoes, Roaches, Fleas, Ants, Sowbugs, Brown dog ticks, Spiders and Silverfish – Apply as a coarse wet spray using one (1) pint per 1,000 square feet. Avoid contact with desirable plants, as plant injury or loss may occur.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

**PESTICIDE STORAGE:** Do not use or store near heat or open flame. Keep product upright in original container, tightly closed. High temperature may shorten shelf life of product.

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

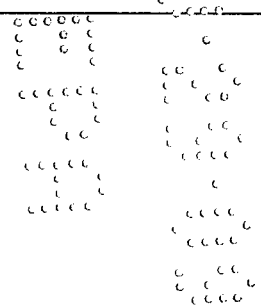
**CONTAINER DISPOSAL:**

**Nonrefillable Container (rigid material; less than 5 gallons):** Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Nonrefillable Container (rigid material; 5 gallons or greater):** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**Refillable Containers:**

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



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**WARRANTY—CONDITIONS OF SALE**

OUR DIRECTIONS 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. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable law, 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.



Manufactured By:  
**Drexel Chemical Company**  
P.O. BOX 13327, MEMPHIS, TN 38113-0327  
**SINCE 1972**

