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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

> > JAN 1 4 2010

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

Subject: DREXEL 435 OIL TECHNICAL EPA Reg. No. 19713-373 Notification Application Dated August 26, 2009

Dear Ms. Chan:

The Agency has received your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4, dated August 26, 2009, for the product Drexel 435 Oil Technical, EPA Reg. No. 19713-373. The Registration Division (RD) has reviewed this request and finds that the actions requested fall within the scope of PR Notice 2007-4. The label submitted with the application has been stamped "Notification" and will be placed in our records.

The new "STORAGE AND DISPOSAL" text needs a few editorial changes. In the first paragraph under "CONTAINER DISPOSAL:", change "Nonrefillable Container" to "Nonrefillable Containers". At the end of the tenth sentence of the same paragraph, change "several time" to "several times".

The label submitted on August 26, 2009, also reportedly incorporates changes prescribed by the Agency's product reregistration acceptance letter of August 11, 2009. Although the highlighted changes appear to be appropriate, you still must submit a clean copy of the final printed label -- without highlighting -- for our files.

If you have any questions, please call me directly at 703-305-6406.

Sincerely,

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William W. Jacobs Insecticide-Rodenticide Branch Registration Division (7505P) Office of Pesticide Programs

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1. Company/Product Nur 19713-373	nber		2. EPA Product Meredith Lav	•			osed Classifi	cation Restricted
4. Company/Product (Na DREXEL 435 OIL T			۲۲ PM# ۲۵ Insecticide-F	Rodenticide	Branch			
Drexel Chemical Compar P.O. Box 13327 Memphis, TN 38113-032	7	ode)	6. Expedited (b)(i), my prod to: EPA Reg. N	luct is simil		in comp	position and	
Check if	this is a new address	·	Product Nat Section - II	me				
Notification - Exp	response to Agency letter lain below. itional page(s) if necessar		"Me T	y letter date oo" Applicat - Explain bel	ow.	IFICA N 1 4		
Submission of revised lal	bel to incorporate EPA's co	mments of 8/11	1/2009 and PR Notice 2007-4	4. Details are	in the cover lette	er accomp	panying this s	submission.
Thank you.		mments of 8/11	1/2009 and PR Notice 2007-4 Section - III	4. Details are	in the cover lette	er accomp	banying this s	submission.
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EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.



August 26, 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 Final Label per EPA Stamped Accepted Label dated August 11, 2009 and per PR Notice 2007-4 DREXEL 435 OIL TECHNICAL (EPA Reg. No. 19713-373)

Herewith:

- 1. Completed EPA Form 8570-1
- 2. One (1) copy of the label (373SP-0809*) incorporating EPA's comments dated 8/11/2009 and with revision on the storage and disposal statements per PR Notice 2007-4.

I highlighted the changes for easy reference.

3. Certification Statement

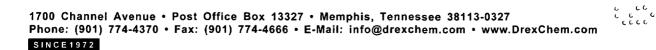
If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours, FOR DREXEL CHEMICAL COMPANY

Cuz G. Chan Luz G Chan

Registration Manager



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435 Oil Technical Spray Oil

ACTIVE INGREDIENT:

Mineral Oil* 100.0% *Unsulfonated residue of petroleum distillate is 92.0% minimum. Weight per gallon is 7.1 pounds. Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN CAUTION See FIRST AID Below

EPA Reg. No.19713-373

EPA Est. No. 19713-XX-XXX **FIRST AID** Net Content:

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- · Rinse skin immediately with plenty of water for 15 to 20 minutes.
- · Call a poison control center or doctor for treatment advice

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.

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 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 further 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.

NOTE TO PHYSICIAN: Contains petroleum distillates. Do not induce vomiting since vomiting may induce aspiration pnuemonia.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through the skin. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

SPILL CONTROL

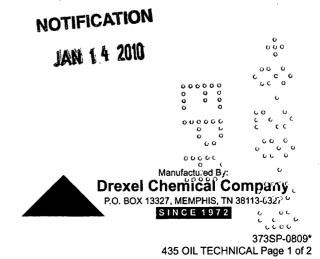
Eliminate all ignition sources. Ventilate confined spaces. Keep the public away. Recover free product. Add sand, earth or other suitable absorbent to spill area. Keep product out of sewers and water courses. Advise authorities if product cannot be contained. Conform with applicable governmental regulations.

FIREFIGHTING

Use waterspray to keep nearby containers cool. Extinguish with foam, dry chemical or carbon dioxide. Do not spray oil fires with water.

NOTICE

- Empty containers retain residue (liquid and/or vapor) and can be dangerous.
- DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE THIS CONTAINER TO HEAT, FLAME, SPARKS OR OTHER SOURCES OF IGNITION; IT MAY EX-PLODE AND CAUSE INJURY OR DEATH.
- Dispose of other "empty" containers in accordance with governmental regulation.



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into the following use(s):

A. TREE, NUT, ROW AND FIELD CROPS:

Alfalfa	Coffee	Peaches
Ambersweet	Cotton	Pears
mandarins	Cranberries	Pecans
Almonds	Figs	Pistachios
Apples	Grapefruit	Plantains
Apricots	Grapes	Plums
Avocados	Lemons	Prunes
Bananas	Limes	Strawberries
Blueberries	Mandarins	Tropical Fruit
Bushberries	Nectarines	(Kiwi,
Caneberries	Olives	Caneberries
Cherries	Oranges	Mango,
Citron	(Hamlin, Navel,	Papaya,
Citrus	Pineapple,	Pineapple)
Cocoa	Valencia)	Walnuts

B. ORNAMENTAL FLOWERS AND FOLIAGE PLANTS. SHRURS CHRISTMAS TREES AND SHADE TREES:

SHRUBS, CHRIS	IMAS IREES, AND	SHADE IREE
Apple	Dogwood	Magnolia
Bedding Plants	Flower and foliage	Maple
Birch	plants and	Pyracantha
Christmas trees	shrubs	Roses
Conifers	Flowering cherry	Sycamore
Deciduous and	Flowering peach	Woody
broadleaf	Hawthorne	ornamentals
evergreens	Holly	
VEGETABLES:		
Asparagus	Corn (Field, Sweet)	Peppers
Beans	Cucumbers	Potatoes

C.

Corn (Field, Sweet)	Peppers
Cucumbers	Potatoes
Cucurbits	Pumpkins
Eggplant	Squash
Hops	Sugar beets
Lettuce	Tobacco
Melons	Tomatoes
	Cucumbers Cucurbits Eggplant Hops Lettuce

D. ROW CROPS CLASSIFICATION:

Beans	Rice	Sugar beets
Corn	Sorghum	Wheat
Peanuts	Soybeans	
Potatoes	Sugarcane	

This product may be used to formulate products for specific use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such use(s).

AGE AND DISPOSAL ST

Do not contaminate water, food, or feed by storage and disposal, PESTICIDE STORAGE: Store in a cool, dry, locked area out of reach of children. Keep oil container tightly closed in storage to prevent entry of water.

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; 5 gallons or greater): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least 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 time. 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 mineral oil 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 pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

WARRANTY - CONDITIONS OF SALE

Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the "DI-RECTIONS FOR USE." Manufacturer makes no other warranties, expressed or implied, including FITNESS and MERCHANTABILITY. 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 is accepted as such by the Buyer.

