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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

JAN 14 2010

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

Subject: DREXEL 415 OIL TECHNICAL  
EPA Reg. No. 19713-397  
Notification Application Dated August 26, 2009

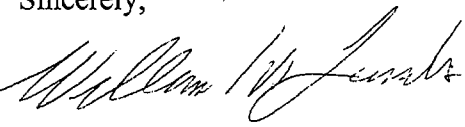
Dear Ms. Chan:

The Agency has received your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4, dated August 26, 2009, for the product Drexel 415 Oil Technical, EPA Reg. No. 19713-397. 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,  
  
William W. Jacobs  
Insecticide-Rodenticide Branch  
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 19713-397	2. EPA Product Manager Meredith Laws	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL 415 OIL TECHNICAL	PM# 87 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 8/11/2009 "Me Too" Application.
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> Other - Explain below.
<input checked="" type="checkbox"/> Notification - Explain below.	<b>NOTIFICATION</b> <b>JAN 14 2010</b>

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

Submission of revised label to incorporate EPA's comments of 8/11/2009 and PR Notice 2007-4. Details are in the cover letter accompanying this submission.

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 checked="" type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<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 50, 55, 265 gal; Bulk; Tote		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name LUZ G CHAN		Title REGISTRATION MANAGER		Telephone No. (Include Area Code) (901) 774-4370	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>Luza Chan</i> 2009.08.26 10:37:34 -05'00'		3. Title REGISTRATION MANAGER			
4. Typed Name LUZ G CHAN		5. Date August 26, 2009			



**Drexel Chemical Company**

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 415 OIL TECHNICAL (EPA Reg. No. 19713-397)**

Herewith:

- 1. Completed EPA Form 8570-1
- 2. One (1) copy of the label 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.

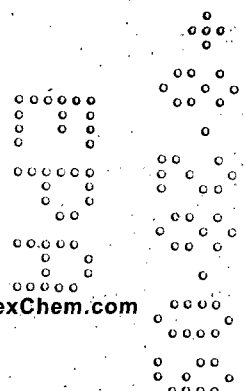
- 3. Certification Statement

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

Thank you.

Respectfully yours,  
FOR DREXEL CHEMICAL COMPANY

*Luz G Chan*  
Luz G Chan  
Registration Manager





# 415 Oil Technical

**ACTIVE INGREDIENT:**

Mineral Oil\* ..... 100.0%  
\*Unulfonated 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. 19713-397

EPA Est. No. 19713-XX-XXX

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

FIRST AID	
<b>IF ON SKIN OR CLOTHING:</b>	<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>
<b>IF IN EYES:</b>	<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>
<b>IF SWALLOWED:</b>	<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>
<b>IF INHALED:</b>	<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>
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.	
<b>NOTE TO PHYSICIAN:</b> Contains petroleum distillates. Do not induce vomiting since vomiting may induce aspiration pneumonia.	

**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.

**USE INFORMATION**

For Formulator use only. Formulators are responsible for obtaining EPA Regulation for their own end-use product.

**DIRECTIONS FOR USE**

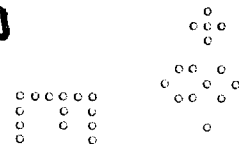
It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Only for formulation into the following uses:

- 1) Alfalfa, Almonds, Apples, Apricots, Avocados, Bananas, Barley, Beans, Beets, Blueberries, Cabbage, Caneberries, Cauliflower, Celery, Cherries, Christmas trees, Citrus (all), Corn, Cotton, Cranberry, Cucurbits, Eggplant, Figs, Flowers, Foliage plants, Fruit trees, Grapes, Hops, Nectarines, Olives, Ornamentals, Peaches, Pears, Pecans, Peppers, Pistachios, Plums, Prunes, Pumpkins, Rice, Shade trees, Shrubs, Sorghum, Soybeans, Squash, Strawberries, Sugarbeets, Sweet corn, Tobacco, Tomatoes, Walnuts.
- 2) Mosquito larvae control in ditches, drainage areas, floodwater areas, marshes, settling ponds, waste treatment and other man-made depressions.

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).

**NOTIFICATION**

**JAN 14 2010**



Manufactured By:

**Drexel Chemical Company**

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

**SINCE 1972**

415 OIL TECHNICAL

397SP-0809\*  
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### STORAGE AND DISPOSAL

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 "DIRECTIONS 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.

