

19713-411

8/10/2010

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Ms. Luz Chan
Registration Manager
Drexel Chemical Company
1700 Channel AVE
Memphis, TN 13327

AUG 10 2010

Dear Ms. Chan:

SUBJECT: Drexel Metalaxyl Technical
EPA Registration Number 19713-411
OPPIN Decision Number 431077
Your Submission of March 18, 2010

The amendment referred to above, submitted in connection with registration under section (3) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) is acceptable provided that you make the following changes:

Page 1 - Precautionary Statements:

Remove the box around the hazards to Humans and Domestic Animals section because the Environmental Hazards are also a part of the Precautionary Statements section as well.
Add "Avoid contact with skin." after "Harmful of swallowed or absorbed through the skin."
Change "Wash thoroughly with soap and water after handling" to "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet."

Page 2 – Application Rate Table – Grain Crops:

In the "Crop" column of the "Grain Crops" row, change "Oates" to "Oats".

Page 2 – Application Rate Table – Vegetables (seed and pod):

In the "Crop" column of the "Vegetables (seed and pod)" row, change "Chickpeas (Garbonzos)" to "Chickpeas (Garbanzos)".

Page 3 – Storage and Disposal:

Delete the heading "Prohibitions."
Change the sentence "Do not contaminate water, food or feed by storage, disposal or cleaning of equipment." to "Do not contaminate water, food or feed by storage or disposal."
Delete the sentence "Open dumping is prohibited."

Submit one (1) copy of the final printed label before the product is released for shipment.

A stamped copy of the label is enclosed for your records. If you have any questions, please contact Lisa Jones of my team at (703) 308-9424 or jones.lisa@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7504P)

Enclosure: Stamped label

3085

ACCEPTED
with COMMENTS
In EPA Letter Dated:
AUG 10 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

19713-411



Drexel

Metalaxyl Technical

For Manufacturing Use Only

ACTIVE INGREDIENT:

Metalaxyl: [N-(2,6-dimethylphenyl)-N-(methoxyacetyl)alanine methyl ester] 97.0%

OTHER INGREDIENTS: 3.0%

TOTAL: 100.0%

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. 19713-411

EPA Est. No. 19713-X-XXX

Net Content: _____

FIRST AID

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.
- 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 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 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: May cause substantial but temporary eye damage. Harmful if swallowed or absorbed through the skin. Do not get in eyes or on clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

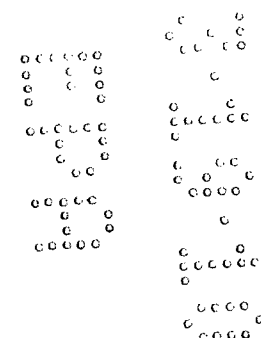
Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. 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.

DIRECTIONS FOR USE

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

Use Pattern: This product is for formulator use in the manufacture of agricultural seed treatment fungicidal products only, offered for sale to the public, and which are duly registered with the Environmental Protection Agency, Washington, DC, for the uses listed below.

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



Manufactured For:

Drexel Chemical Company

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

SINCE 1972

Only for formulation into seed treatment fungicidal products, for the use sites listed in the following table:

4045

CROP	MAXIMUM USE RATE (oz. a.i./cwt)	DISEASE
Carrots	0.25	For control of Pythium damping-off
Cotton	0.50	For Pythium seed rot and damping-off
Peanuts	0.25	For Pythium seed rot and damping-off
Soybeans	0.50	For Pythium damping-off and early season Phytophthora control
Sorghum	0.25 (for disease resistant cultivars)	For control of Pythium and systemic downy mildew
Sorghum	0.50 (for non-disease resistant cultivars)	For control of Pythium and systemic downy mildew
Spinach	0.25	For Pythium damping-off
Sunflowers	1.0	For control of systemic downy mildew
Garden Beets (including Sugar Beets)	0.25	For control of Pythium damping-off
Forage Legumes: Alfalfa, Clover, Lespedeza, Beans (for forage), Soybeans (for forage), Soybean hay, Peanut hay, Peas (for forage), Pea vine hay, Cowpeas (for forage), Cowpea hay, Trefoil, Vetch and Velvet beans (for forage)	0.50	For Pythium damping-off and early season Phytophthora control
Grain Crops: Wheat, Barley, Rye, Oates, Millet, Milo, Corn (Field corn, Sweet corn and Popcorn), Buckwheat and Triticale	0.25	For Pythium damping-off control.
Sweet Corn	0.50	For control of systemic downy mildew.
Rice	0.50	For Pythium damping-off control.

(Continued)

(Cont.)		
CROP	MAXIMUM USE RATE (oz. a.i./cwt)	DISEASE
Vegetables (Seed and Pod): Black-Eyed Peas, Chickpeas (Garbanzos), Cowpeas, Dill, Edible Soybeans, Field Beans, Field Peas, Garden Peas, Green Beans, Kidney Beans, Lima Beans, Lupines, Navy Beans, Okra, Peas, Pole Beans, Snap Beans, String Beans, Wax Beans And Lentils	0.25	For Pythium damping-off and early season Phytophthora control.
Peas	0.50	For Pythium damping-off and systemic Downy mildew.
Cucumbers	0.25	For control of Pythium damping-off.
Turf Grasses	0.50	For Pythium damping-off control on golf courses, home lawns, reclamation and erosion control projects.
Forage Grasses	0.25	Grasses grown for hay grazing or silage, corn (fodder or silage), sorghum (hay or Silage), and small grain grown for hay or Grazing.
Cucurbit Vegetables	(For export, 0.25)	For Pythium damping-off control.
Fruiting Vegetables	(for export, 0.49)	For Pythium damping-off control
Leafy Vegetables	(for export, 0.49)	For Pythium damping-off control
Brassica (Cole) Leafy Vegetables	(for export, 0.49)	For Pythium damping-off control
Root and Tuber Vegetables	(for export, 0.49)	For Pythium damping-off control.
Onions	(for export, 0.49)	For Pythium damping-off and early season Phytophthora control.
Corn	(for export, 0.49)	For Pythium damping-off control
Corn	(for export, 1.00)	For control of systemic downy mildew.
Millet	(for export, 0.49)	For Pythium damping-off control and early season Phytophthora control.
Millet	(for export, 0.84)	For control of systemic downy mildew
Peas	(for export, 1.00)	For Pythium damping-off control.
Sorghum	(for export, 0.5)	For Pythium damping-off control.
Sorghum	(for export, 1.5)	For control of systemic downy mildew.
Sunflowers	(for export, 3.0)	For control of systemic downy mildew.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

PESTICIDE STORAGE: Store in original container only in a cool, dry, locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination. In case of a spill or broken container, call CHEMTREC at 800-424-9300.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product are acutely toxic. Improper disposal of unused pesticide is a violation of Federal Law. Pesticides that cannot be used according to label instructions must be disposed of according to Federal, State or Local procedures. For guidance in proper disposal methods, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional office.

CONTAINER DISPOSAL:

Nonrefillable Container (Flexible-bag—all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. 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—Greater than 50 Lbs.): 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 once 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 Container: 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 content from this container into application equipment or a mix tank. Fill the container about 10 percent 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.

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, express or implied, including FITNESS or MERCHANTABILITY. To the extent consistent with applicable law, in no case shall Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the foregoing is a condition of sale and is accepted as such by the Buyer.

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