

19713-486 8/9/2011 1/11



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

AUG 09 2011

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Luz Chan  
Drexel Chemical Company  
1700 Channel Ave., PO Box 13327  
Memphis, TN 38113-0327

Subject: Notification per PR Notice 98-10  
Drexel Defol 750  
EPA Reg. No. 19713-486  
Application dated August 4, 2011

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 of the subject product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact Hope Johnson at 703-305-5410.

Sincerely,

Kable Bo Davis  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)



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

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 19713-486	2. EPA Product Manager Kable Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL DEFOL 750	PM# 25/Herbicide 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**

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response to Agency letter dated \_\_\_\_\_  "Me Too" Application.

Notification - Explain below.  Other - Explain below.

**NOTIFICATION**

**AUG 09 2011**

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

Submission of revised label to reinstate the June 16, 2009 Sorghum ground application volume of application (i.e. 10 to 20 gals.) that was inadvertently changed when the label was amended on June 22, 2011 subsequently accepted by the Agency on July 22, 2011.

**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
<b>* Certification must be submitted</b>	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	Other (Specify) _____	
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
<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 (Stamp)
2. Signature 	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date August 4, 2011	



**Drexel Chemical Company**

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August 4, 2011

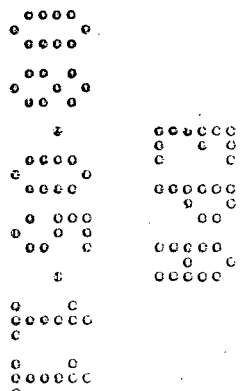
**NOTIFICATION**  
**AUG 09 2011**

***Submission Revised Label per PR Notice 98-10***  
**DREXEL DEFOL 750 (EPA Reg. No. 19713-486)**

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





**Drexel Chemical Company**

4/11

August 4, 2011

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

**NOTIFICATION**

**AUG 09 2011**

**Re: Submission of Revised Label per PR Notice 98-10  
DREXEL DEFOL 750 (EPA Reg. No. 19713-486)**

Herewith:

1. Completed EPA Form 8570-1
2. Two copies (marked and clean) of the revised label (486SP-0711\*) reinstating the June 16, 2009 Sorghum volume of application (i.e. 10 to 20 gals.) that was inadvertently changed when the label was amended on June 22, 2011 subsequently accepted by the Agency on July 22, 2011.

A copy of the June 16, 2009 and the July 22, 2011 EPA Stamped Accepted labels are enclosed for reference.

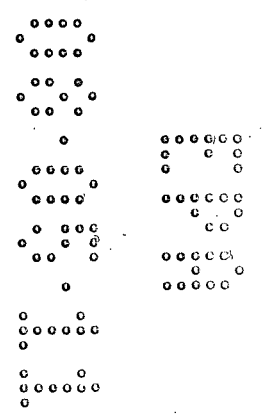
3. Certification statement per PR Notice 98-10

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,  
DREXEL CHEMICAL COMPANY

*Luz G Chan*  
Luz G Chan  
Registration Manager



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**NOTIFICATION**

**AUG 09 2011**



**Defol 750**  
Defoliant/Desiccant with Fire Retardant

**ACTIVE INGREDIENT:**

Sodium chlorate..... 52.0%

**OTHER INGREDIENTS:** ..... 48.0%

**TOTAL:** ..... 100.0%

This product contains 7.5 pounds of Sodium chlorate per gallon.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

**See FIRST AID Below**

**SHAKE WELL BEFORE USING**  
[Optional: Recirculate Contents Before Use]

EPA Reg. No. 19713-486  
EPA Est. No. 19713-XX-XXX

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

<b>FIRST AID</b>	
<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>	e e e e
<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>	e c e e e e c c c c e e e e c
<p>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.</p>	

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### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are made of any waterproof material such as polyethylene or polyvinyl chloride. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

**All mixers, loaders, applicators, and other handlers must wear:** Long-sleeved shirt and long pants, shoes, and socks.

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.

See engineering controls for additional requirements.

**Enclosed Cockpits/Cabs:** Applicators must use an enclosed cockpit or enclosed cab that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(6)].

### 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

Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water when disposing of equipment washwater or rinsate.

### 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 through any type of irrigation system. 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 regulation.

### AGRICULTURAL USE REQUIREMENTS

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

Do not enter or allow worker entry into treated areas during the REI of 12 hours.

PPE required for early entry to treated areas that is permitted under the WPS and that involves contact with anything that has been treated, such as plants, soil or water is: Coveralls, shoes and socks, and chemical-resistant gloves made of any waterproof material.

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## APPLICATION

DEFOL 750 may be applied by aircraft or ground equipment. It is essential that the foliage be thoroughly covered. The specified dilution rates should be carefully observed. A non-ionic surfactant such as Surf-Ac® 820 or an emulsifiable crop oil such as Peptoil™ may enhance the results. This product should not be mixed with insecticides or other organic materials, unless specifically recommended, because a fire or explosion may result.

Precautions should be taken to avoid having spray or spray drift contact adjacent crops or desirable vegetation or they may be defoliated. Equipment should be washed before and after use and care should be taken so that product does not dry in tank or on spray nozzles. Washwater should not be allowed to contact desirable vegetation.

**When using this product under dry land conditions, injury may occur to rotational crops.**

## SPRAY DRIFT MANAGEMENT

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

### Wind Speed

Do not apply at wind speeds greater than 15 mph.

### Droplet Size

Apply as a medium or coarser spray (ASAE Standard 572).

### Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height.

Do not make applications into areas of temperature inversions or stable atmospheric conditions.

### Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of sodium chlorate. Where states have more stringent regulations, they must be observed.

### Equipment

All application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

### Additional Requirements for Aerial Applications

1. The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.
2. Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety.
3. When applications are made with a crosswind, the swath must be displaced downwind. The applicator must compensate for this displacement at the up and downwind edge of the application area by adjusting the path of the aircraft upwind.

### Additional Requirement for Groundboom Application

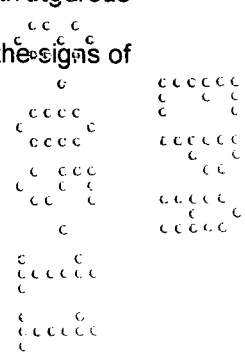
Do not apply with a nozzle height greater than 4 feet above the crop canopy.

## DEFOLIATION

Ideally, defoliation is favored on clear, calm, sunny days with high temperatures and high humidity. If rain is anticipated within 24 hours, application should be delayed whenever possible. Defoliation may be slowed when daytime temperatures are below about 60°F and with some crops, especially with vigorous varieties, regrowth can occur.

In order to obtain acceptable defoliation results, the crop must be fully mature. In most cases, the signs of maturity include:

1. A slight discoloration of the foliage is apparent, often with a yellowish or reddish tinge.
2. Vegetative growth has slowed or ceased, with little or no secondary growth.
3. A slight downward pull on a leaf gives a clean break from the stalk.



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Adequate fertility, ample soil moisture, good insect control and good weed control also favor defoliation. Plants which have been under stress as from drought or insect pressure give less reliable results because tough, wilted or damaged leaves do not permit the proper uptake of the chemical and tend to inhibit the formation of an abscission layer. Typically, under such circumstances, the leaves are desiccated but do not drop, which in turn, often causes problems with excessive trash during harvesting. For crops where there is a heavy canopy of foliage, obtaining thorough coverage is sometimes difficult. Whenever practical, the use of ground equipment should be considered. The higher dilution rates should be used and any other available methods employed which will assure that the plants are completely covered all the way to the bottom leaves. If coverage is incomplete, a second application may be necessary in order to defoliate the lower leaves and to prevent secondary growth.

**DESICCATION**

When the objective is to reduce crop moisture or to desiccate weeds prior to harvest, most of the points discussed under "DEFOLIATION" are applicable. Incomplete coverage will give erratic results, especially with vines such as Morningglory where the slender stems may be sheltered from the spray by the crop canopy, leaving the vines succulent and tough so they will become entangled in the harvesting machinery. Once again, larger spray volume will encourage more complete coverage and more reliable desiccation.

**CROPS**

Crop	Rate Per Acre (qts.)	Water (gals.)
Chili peppers	1.6 to 4	Air: 5 to 15 Ground: 20 to 40
SPECIFIC DIRECTIONS: Apply 10 days before harvest. To be used on Peppers for processing only. Consult a processor before applying.		
Corn	3.2	Air: 5 to 7 Ground: 10 to 20
SPECIFIC DIRECTIONS: Use as a harvest aid to desiccate trashy weeds in early maturing Corn. Apply at least 14 days before anticipated harvest date. Use the low dilution rates when weeds are small and the crop canopy is fairly open. Desiccation of Morningglory and other vines may be erratic. DO NOT graze treated fields or feed fodder, forage or residual grain within 14 days of application.		
Cotton	1.6 to 3.2	Air: 5 to 10 Ground: 10 to 20
SPECIFIC DIRECTIONS: Apply no later than 7 days before harvest. The Cotton plants should be mature with the youngest bolls expected to make Cotton being at least 30 days old. Thorough coverage is essential. DO NOT graze treated fields or feed gin waste to livestock. DO NOT apply more than 3.2 quarts per acre per application. A maximum of one application per year is permitted, except in California, where a maximum of two applications per year is permitted.		
Dry beans	3.2	Air: 5 to 10 Ground: 10 to 20
SPECIFIC DIRECTIONS: Thorough coverage is essential. Make application 7 to 10 days before anticipated harvest, longer if temperatures are cool. DO NOT graze treated fields or feed treated fodder or forage to livestock.		
Flax	3.2	Air: 5 (min.) Ground: 10 (min.)
SPECIFIC DIRECTIONS: Use as a harvest aid to desiccate trashy weeds and to reduce moisture in the mature crop. Apply 7 to 10 days before anticipated harvest date. Activity of the spray will be enhanced by addition of a good non-ionic surfactant at the rate of 1 quart per 100 gallons of spray. DO NOT graze treated fields or feed treated foliage and fodder for 14 days after application.		





### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Do not stack over 2 pallets high. Move containers by handles or cases. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original containers only. Unloading storage and work areas must be as clean as possible to prevent contamination if spilled. If concentrate or spray solution is allowed to dry on flammable objects, the chlorate component can act as oxidizer. If the contents are leaking or material is spilled, follow these steps:

1. Contain spill. Absorb with a material such as sawdust, clay granules or dirt.
2. Collect and place in suitable containers for disposal.
3. Wash area with soap and water to remove remaining pesticide.
4. Follow washing with clean water rinse.
5. Clothing contaminated with chlorate solution must be removed at once before solution dries. Dried contaminated clothes can be ignited easily. Wash contaminated clothing immediately.
6. Do not allow runoff to enter sewer or contaminate water supplies.
7. Dispose of waste as indicated below:

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

**CONTAINER DISPOSAL:**

**Nonrefillable Container (rigid material; less than 5 gallons):** 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 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 use or 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 up to < 250 gallons):** 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 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 (≥ 250 gallons & Bulk):** 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.

