

19713-486

07/25/2012

1/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Luz G Chan
Drexel Chemical Company
P O Box 13327
Memphis TN 38113 0327

JUL 25 2012

Subject Drexel Defol 750
EPA Reg No 19713 486
Application Dated July 10 2012
Label Notification per PRN 98 10

Dear Ms Chan

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98 10 for Drexel Defol 750 (EPA Reg No 19713 486) dated July 10 2012 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 stamped Notification and will be placed in our records

If you have any questions please contact Emily Hartman via email at hartman.emily@epa.gov or by phone at (703) 347 0189

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis".

Kable Bo Davis Product Manager 25
Herbicide Branch
Registration Division
Office of Pesticide Programs



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	
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 _____	NOTIFICATION JUL 25 2012
<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	

Explanation Use additional page(s) if necessary (For section I and Section II)
 Submission of corrected label (486SP 0711) reinstating the correct verbiage under First Aid for If Swallowed per EPA's July 16 2009 Reregistration Acceptance Details are in the cover letter accompanying this submission

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

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 <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If Yes Unit Packaging wgt	No per container	If Yes Package wgt	No per container
3 Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4 Size(s) Retail Container less than 5 gals 5 gals & greater		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
Certification 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 	3 Title REGISTRATION MANAGER	
4 Typed Name LUZ G CHAN	5 Date July 10 2012	



Drexel Chemical Company

July 10 2012

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

**Re Submission of Corrected Label per EPA s Notice of Pesticide Re registration dated 6/16/2009
DREXEL DEFOL 750 (EPA Reg No 19713 486)**

Sir/Madam

Herewith

- 1 Completed EPA Form 8570 1
- 2 Two copies (marked and clean) of the revised label (486SP 0711*) reinstating the correct verbiage for If Swallowed (i.e. *Have person sip a glass of water if able to swallow*) in the First Aid box according to the June 16 2009 EPA s Notice of Pesticide Reregistration. The said statement was inadvertently changed to *Do not give any liquid to the person* when we applied for label amendment on June 22 2011 which was subsequently accepted by the Agency on July 22 2011. Please take note that all current Confidential Statement of Formula (CSFs) for the above product **do not contain petroleum distillate**.

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

I sincerely apologize for my oversight. If you have questions/clarification regarding this submission, my contact number is (901) 774 4370 or e-mail Lchan@drexchem.com.

Thank you

Respectfully yours
DREXEL CHEMICAL COMPANY

Luz G Chan
Luz G Chan
Registration Manager

4/10



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 _____

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
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	

NOTIFICATION

486SP 0711

JUL 25 2012

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.

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.

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 (m n) 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		

Crop	Rate Per Acre (qts)	Water (gals)
Grain sorghum	2 4 to 3 2	Air 5 to 10 Ground 10 to 20
SPECIFIC DIRECTIONS To reduce the moisture content of the grain while the crop is standing apply 7 to 10 days before harvest Use the lower rates when grain moisture is low and the weather is clear and dry Use the higher rate when conditions for desiccation are poor		
Guar beans	3 2	Air 5 to 10 Ground 10 to 20
SPECIFIC DIRECTIONS Use to facilitate harvest and reduce moisture in the fully mature seed heads Make application 7 to 10 days before anticipated harvest date DO NOT graze treated fields or feed treated fodder or forage to livestock		
Potatoes	3 2	Air 5 to 10 Ground 10 to 20
SPECIFIC DIRECTIONS To defoliate plants and facilitate harvest apply 10 days before harvest DO NOT apply under conditions of extreme heat during the middle of the day		
Rice	2 4 to 3 2	Air 5 (min) Ground 10 to 20
SPECIFIC DIRECTIONS Use to facilitate harvest and reduce moisture in the fully mature seed heads and to desiccate immature Red rice in mature White rice Use the lower rate when crop conditions and weather are right to enhance rapid drying Apply 7 to 10 days before anticipated harvest To avoid drift do not apply during windy weather Thorough coverage of the crop is essential to achieve good results DO NOT graze treated fields or feed treated straw or crop residues within 14 days of application		
Safflower	3 2	Air 5 to 10 Ground 20 to 30
SPECIFIC DIRECTIONS Use to facilitate harvest and reduce moisture in the fully mature seed heads Make application 7 or more days before normal harvest when Safflower heads are fully mature DO NOT graze treated fields or feed treated forage		
Southern peas	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		
Soybeans	3 2	Air 5 (min) Ground 20 (min)
SPECIFIC DIRECTIONS Use as a harvest aid to dry weeds in early maturing Soybeans and to facilitate the harvest Make application 7 to 10 days before anticipated harvest date when beans are mature and ready for harvest DO NOT graze treated fields or feed treated forage		
Sunflowers	3 2	Air 5 to 10 Ground 20 to 30
SPECIFIC DIRECTIONS Use to facilitate harvest and reduce moisture in fully mature seed heads When applying by ground apply with a high clearance sprayer Make application 7 or more days before normal harvest when Sunflower heads are fully mature DO NOT apply later than 7 days before harvest DO NOT graze treated fields or feed treated forage within 14 days of application		
Wheat	3 2	Air 5 (min) Ground 10 (min)
SPECIFIC DIRECTIONS Use as desiccant on Wheat DO NOT apply more than 3 2 quarts per acre DO NOT harvest wheat within 3 days of 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 and 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

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 directed 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

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