

19713-505

7/18/2007

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

JUL 18 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

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

Subject: Supplemental Label: Revised PHI, restrictions and application rates for corn (Field Corn and Sweet Corn, including Corn Grown for Seed)  
EPA Reg. No. 19713-505  
Drexel Chlorpyrifos 15G

Dear Ms. Chan:

The supplemental labeling for corn referred to above is acceptable with the following comments:

- 1) You must make the new approved supplemental label available to all distributors and users immediately. The Agency recommends that the registrant send distributors, dealers and other key end-users e-mail/letters/FAX forwarding the revised labeling and explanations for quick implementation.
- 2) Please incorporate the supplemental label changes and all the other chlorpyrifos mitigation language required by the IRED into the section 3 label. Please submit the revised section 3 label for re-registration within a month from the date of this letter by e mail and/or paper copies.
- 3) For clarity add at the end of the restriction "Re-treatment with a second soil application..... is allowed under replant situation.....**only when initially applied at the rate of 1 lb.**

A stamped copy "accepted with comments" of the supplemental label is enclosed for your records. If you have any questions please call me at (703) 308-8328.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Akiva Abramovitch".

Akiva Abramovitch, Ph. D. Chemist  
Insecticide/Rodenticide Branch  
Registration Division (7505P)

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**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

**JUL 18 2007**

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

**Drexel**

# **CHLORPYRIFOS 15G**

**Insecticide**

(EPA Reg. No. 19713-505)

**FOR USE IN CORN (FIELD, SWEET, CORN GROWN FOR SEED) CONSISTENT WITH  
REQUIREMENTS OF CHLORPYRIFOS IRED**

**READ THE ENTIRE DREXEL CHLORPYRIFOS 15G LABEL BEFORE PROCEEDING  
WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABEL**

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

**DIRECTIONS FOR USE**

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

**This labeling and the EPA registered labeling must be in the possession of the user at time of pesticide application.**

All applicable directions, restrictions and use precautions on DREXEL CHLORPYRIFOS 15G label(s) are to be followed. This labeling contains supplemental instructions and restrictions for use of this product which may not appear on the DREXEL CHLORPYRIFOS 15G label. Follow the instructions carefully.

**CORN FIELD, SWEET CORN, CORN GROWN FOR SEED**

**At-Plant T-Band Treatment:** Apply this product as a T-band over an open seed furrow over the row behind the planter shoe, in front of the wheel press. In conventional and minimum-till Corn, incorporate into the top 0.5 to 1 inch of soil using suitable equipment. A soil applied T-band treatment may be followed by post-applied herbicides. For Wireworm control, consider a hopper box insecticidal treatment. This product has demonstrated suppression of certain soil-borne pathogens which may result in physiological and agronomic advantages to Corn under environmental stress conditions when compared to Corn not treated with this product.

**At Plant In-Furrow Treatment:** Apply this product at planting time as an in-furrow treatment in conventional, minimum and no-till Corn. Direct the granules into the planter shoe with the seed or place the applicator tube directly behind the planter shoe so that the granules drop into the seed furrow, or place the granular band applicator behind the planter shoe so that the granules fall on the soil surface into the open seed furrow and are covered with soil.

**Post-plant Treatment:** To control Corn rootworm larvae, apply this product at cultivation time by placing the granules at the base of the plant on both sides of the row just ahead of the cultivation shovels and cover the soil. To control European and Southwestern Corn borer larvae, apply this product in a band over the row so that the granules are directed into the whorl, or use a post-plant broadcast treatment. Use application rates of 3.5 to 4 ounces of this product per 1,000 feet of row for low to moderate first generation infestations before larvae have entered Corn stalks. Use application rates of 6 to 8 ounces of this product per 1,000 feet of row for severe first generation infestations and all second generation infestations of European and Southwestern Corn borers before larvae have entered Corn stalks. Consult your State Agricultural Experiment Station or Extension Service Specialist for the proper time to treat and local threshold information. Scouting for insect damage is strongly encouraged.

**Post-plant Broadcast Treatment:** Use this product to control European and Southwestern Corn borers by uniformly broadcasting the granules over the Corn plants by aerial application or by applying the granules into the Corn whorls by ground application. If applied by air, do apply within 150 feet of rivers, natural ponds, lakes, streams, reservoirs, marshes, estuaries, and commercial fish ponds. Apply 5 lbs. of this product per acre for low to moderate first generation infestations or 6.5 lbs. of this product per acre for severe first generation infestations and all second generation infestations. Apply before larvae have entered Corn stalks. Consult your State Agricultural Experiment Station or Extension Service Specialist for local threshold information. Scouting for insect damage is strongly encouraged.

**RESTRICTIONS:**

*Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours unless PPE required for early entry is worn.  
Do not apply within 21 days before harvest of grain or ears.  
Do not apply by aircraft at a rate greater than 1 lb. a.i. per acre.  
Do not make more than one at-plant application and one foliar application of this product per season at the 1 lb. chlorpyrifos a.i. rate.  
Do not make more than three applications of any product containing chlorpyrifos per season, including the maximum allowed of two granular applications, at the 1 lb. chlorpyrifos a.i. rate. Re-treatment with a second soil application of this product is allowed under replant situations due to loss of crop during establishment.  
Do not apply more than a total of 3 lbs. chlorpyrifos a.i. per acre per season.  
Do not make a second application of this product or other products containing chlorpyrifos within 10 days of first application.  
Maximum single application rate for at-plant applications is 8 ozs. of this product per 1000 feet of row (1.3 lbs. chlorpyrifos a.i. per acre).  
Maximum single application rate for post-plant applications is 6.5 lbs. of this product (1 lb. chlorpyrifos a.i.) per acre.  
If more than 1 lb. a.i. granular chlorpyrifos per acre is applied at-plant (for a maximum of 1.3 lbs. a.i. per acre per season), only one additional application of a liquid product containing chlorpyrifos at 1 lb. a.i. per acre is allowed per season, for a total of 2.3 lbs. chlorpyrifos a.i. per acre per season.*

Manufactured By:

**Drexel Chemical Company**

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

**SINCE 1972**

**Application Rates and Pest Controlled**

Pests Controlled	Banded Applications (Ounces per 1,000 Feet of Row)			Aerial Broadcast Application (Pounds per Acre)
	At-Plant Treatments		Post-plant Treatment	
	T-Band	In-Furrow		
Northern and Western Corn rootworm larvae	8	8	8	—
Southern Corn rootworm larvae	8	8	8	—
Cutworms*	8	8	—	—
Wireworms	8	8	—	—
Billbugs	8	—	—	—
Seed corn maggots	8	8	—	—
Grubs	8	8	—	—
Lesser cornstalk borers	8	—	—	—
Seed corn beetles	8	8	—	—
Symphylans	8	—	—	—
Armyworms	—	—	6 to 8	—
European and Southwestern Corn borers: First generation	—	—	3.5 to 8	5 to 6.5
European and Southwestern Corn borers: Second generation	—	—	6 to 8	6.5
Ants**	8	8	—	—
Chinch bugs*	8	8	—	—
* 8 oz. rate of this product—suppression only for in-furrow treatments				
** 8 oz. rate of this product—suppression only; Excludes Fire ants, Harvester and Pharaoh ants				

This product is compatible with all ALS inhibitor herbicides, including Accent®, Beacon® and Broadstrike® herbicides, applied in accordance with label recommendations. Refer to the product labels for additional precautions and directions for use.