19713-50	9	3	-25-,	2002				1
	<i>before completi</i> Un ironmental Washing	ne form. ited States Protectic gton, DC 204	on Agency	Form Ar		OMB No. 2 Registrat Amendr Other	o <u>70-0060</u> tion tent	259579
	A	pplicatio	n for Pesti	cide - Sec	tion l			
. Company/Product Number 19713-509			2. EP Cyn	A Product Ma NTHIA GILE	nager S-PARI	KER	3. Pro	posed Classification
. Company/Product (Name) DREXEL KOP-AM COMPLE	x		PM# Fur	ngicide Bran	ch			
Neme and Address of Applicant Drexel Chemical Compar MEMPHIS, TN 38113-03	(Include ZIP Code ny, P.O. Box 327	•) 13327	6. E: (b)(i) to: EPA	xpedited Re , my product A Reg. No	v eiw. is simil	In accordan lar or identic	ce with l cal in con	FIFRA Section 3(c)(3) nposition and labeling
			Section					
Amendment - Explain below Resubmission in response to V Notification - Explain below.	r. o Agency letter d	ated	[[Agency lat "Me Too" Other - Ex	ed labels Iter date Applicat plain bel	aw,	** 2/29 N(9/2002 DTIFICATION
			Section -	• 111				
. Material This Product Will Be Pa	ckaged in:							
hild-Resistant Packaging Unit P	Packaging Yes No		Veter Soluble Yes No	e rackaging			onteiner Metal Plastic Glass	
Certification must Unit I be submitted	as" Packaging wgt.	No. per container	If "Yes" Package wgt	No. per containe	pr		Paper Other (Sp	oecify)
Lebel Contents Informe	ation 4 or	. Size(s) Ret	ail Container		5. Loc	ation of Labe	l Direction	19
. Manner in Which Label is Affixed	to Product	Lithogr Paper Stencil	aph Jlued ed	U Othe	Pr			
			Section -	IV				
Contact Point (Complete items of	directly below for	identification	n of individual to	be contected,	if neces	sery, to proc	ess this e	pplication)
UZ G PIWONKA			Title REGISTRATIC	N MANAGER	र	T (elephone (901) 774-	No. (Include Area Code) 4370
I certify that the statements i I acknowledge that any know both under applicable law.	have made on th tingly false or mi	Certificat his form and isleading stat	tion all attachments ement may be p	thereto are tru punishable by f	e, accur ine or in	ete and com nprisonment (plete. Fr	5. Date Application (Teceivrd
Signature Cuz G. Fin	anha_	3	REGISTRATION	MANAGER		••	•	
. Typed Name .UZ G PIWONKA		e	5. Date M	arch 4, 20	02	,		-

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

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March 4, 2002

Submission of Final Printed Label per EPA's Letter dd. February 19, 2002 DREXEL KOP-AM COMPLEX (EPA Reg. No. 19713-509)

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

NOTIFICATION

MAR 2 5 2002

LUZ G PIWONKA Registration Manager

NOTIFICATION

MAR 2 5 2002

KOP-AN Complex Liquid Fungicide Spray

Drexel

ACTIVE INGREDIENT:

Copper, metallic*	8.0%
OTHER INGREDIENTS:	92. <u>0%</u>
TOTAL:	100.0%
*From Copper ammonium complex.	

This product contains 0.784 pound of Copper per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

SHAKE WELL BEFORE USING

FIRST AID

EPA Reg. No. 19713-509 EPA Est. No.

Net Contents:

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.

IF ON SKIN OR CLOTHING:

Take off contaminated clothing

- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- 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 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 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 1-800-658-7378.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION: Causes eye and skin irritation. Harmful if swallowed, absorbed through the skin or inhaled. May cause skin sensitization reaction in certain individuals. Avoid contact with the skin, eyes or clothing. Avoid breathing vapor or spray mist. PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category G on an EPA chemical resistance category selection chart. Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves made of any waterproof material, such as Barrier Laminate or Viton and shoes plus socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENT

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticide (140 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing 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

This product is toxic to fish and other aquatic organisms. For terrestrial uses, do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

Note: Add this statement to all container sizes of 5 gallons and higher. 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. 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, 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, chemical-resistant gloves made of any waterproof material, such as Borrier Laminate or Viton and shoes plus socks.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of the product that are NOT within the scope of the Worker. Protection Standard for agricultural pesticides (40CFR Part 170). The WPS applies when this product is used to produce agricultural plants on tarms, forest, nurseries or greenhouses.

Do not enter or allow others to entersthe treated area until sprays have dried.



CHEMIGATION

Do not apply this product through any irrigation system unless this section on chemigation is followed.

Apply this product only through center pivot, motorized lateral move or traveling gun sprinkler irrigation systems that do not contain aluminum components. Do not apply this product through any other type of irrigation system. Crop injury, lack of effectiveness or illegal pesticide residues in the crop can result from non-uniform distribution of treated water. If you have questions about calibration, you should contact State Extension Service Specialists, equipment manufacturers or other experts. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make the necessary adjustments should the need arise.

Public water systems means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.

Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There should be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.

The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

When mixing, fill the nurse tank half full with water. Add this product slowly to the tank while hydraulic or mechanical agitation is operating and continue filling the tank with water. Stickers, spreaders, nutrients, insecticides, etc. should be added last. If the compatibility is questionable, use the compatibility jar test before mixing a whole tank. Because of the wide variety of possible combinations that can occur, observe all cautions and limitations on the labels of all the products used in mixtures. This product should be continuously added through a traveling irrigation system. Agitation is recommended.

APPLICATION AND CALIBRATION TECHNIQUES FOR SPRINKLER IRRIGATION

Center pivot, Motorized Lateral Move and Traveling Gun irrigation Equipment: Operate system and injection equipment at normal pressures recommended by the manufacturer of the injection equipment used. Fill tank of injection equipment with water. Operate system for one complete circle for center pivot or one complete run for motorized lateral move or traveling gun equipment, measuring time required, amount of water injected and acreage contained in circle or run. Mix recommended amount of this product for acreage to be covered into the same amount of water used during calibration and inject into system continuously for one revolution or run. Shut off injection equipment after one revolution or run, but continue to operate irrigation system until this product has been cleared from the last sprinkler head.

Solid set and Portable (Wheel move) irrigation Equipment: Determine the acreage covered by the sprinkler. Fill tank of injection equipment with water and adjust flow to use contents over a 30 to 45 minute period. Mix the desired amount of this product for acreage to be covered into quantity of water used during calibration and operate entire system at normal pressures recommended by the manufacturer of injection equipment used for the amount of time established during calibration. This product can be injected at the beginning or the end of the injection cycle or as a separate application. Stop injection equipment after treatment is completed and continue to operate irrigation system until this product has been cleared from the last sprinkler head.

GENERAL INFORMATION

The control of diseases with fungicides is based on PREVENTION: plant surfaces must be completely covered with the fungicide to successfully prevent infection. Use the highest indicated rate per crop when disease incidence is high or expected to be, depending on rainfall and temperature. The low rate is suitable for general and preventative sprays under normal conditions. Since the weather conditions and disease incidence vary, consult your Agricultural Extension Service for timing and initial application.

GENERAL INSTRUCTIONS

Add this product last, with agitation during mixing and application, until tank is empty. Good bypass agitation is adequate. Observe all precautions and limitations on labeling of all products used in mixtures. In common with all good agricultural practice, start with clean equipment; equipment should be flushed well with water after use.

WATER RATES: Use enough for complete coverage.

Ground Application—Dilute Spraying: Apply specified rate in 10 to 100 gallons of water per acre. Orchard and Grove Spraying: Apply specified rate in 100 to 800 gallons of water per acre. Concentrate Spraying: On Vegetable crops use 5 to 25 gallons of spray mixture per acre; on Fruit and Nut trees use 20 to 250 gallons per acre.

AIR APPLICATION: Apply specified rate in 3 to 20 gallons of water per acre.

FRUIT AND NUT CROPS

Crop	Diseases	Rate of Application	
Almonds	Brown rot	8 to 12 qts. per acre	
	SPECIFIC DIRECTIONS: Apply at delayed- dormant bud swell stage. Dormant oil may be used.		
	Shot hole	8 to 12 qts. per acre	
	SPECIFIC DIRECTIONS: Apply at leaf fail to protect buds and shoots from infection during rainy periods. Reapply every 3 to 4 weeks up to late bud swell. Do not apply after full bloom.		
Apples	Anthracnose	8 to 10 gts, per acre	
	SPECIFIC DIRECTIONS harvest, annually for red 2 to 3 years for yellow va	: Apply to foliage after varieties and once every arieties.	
	Apple scab (black spot), Bacterial canker, Blossom and Shoot blast	8 to 12 qts. per acre	
	SPECIFIC DIRECTIONS: Apply post-harvest before Fall rains.		
	Crown or Collar rot	4 qts. per acre in 100 gals, of water	
	SPECIFIC DIRECTIONS: Apply 4 gals. of sus- pension as a drench on the lower trunk area of each tree. Apply either in early Spring or in late Fall after harvest. Do not use if soil pH is below 5.5 since copper toxicity may result.		
	Fireblight	1 to 2 qts. per acre	
SPECIFIC DIRECT and repeat at 5- to period. Do not use Apply 8 to 12 qts. between silver-tip when green-tip rea occur.		: Apply at 10% bloom y intervals during bloom opper sensitive varieties cre as a full cover spray reen-tip. Discontinue 0.5 inch as injuries may	
Apricots	Brown rot blosscm blight	8 to 12 qts. per acre	
	SPECIFIC DIRECTIONS Apply at red bud to jacket fall stage.		
	Shot hole *	8 to 12"qts, per acre	
	SPECIFIC DIRECTIONS: Apply at leaf fall to protect buds and shoots from infection during rainy periods. Reapply up to late bud swell. Do not apply after full bloom.		
Avocados	Anthracnose	8 ots. per acre	
	SPECIFIC DIRECTIONS buds begin to swell and intervals until August.	: Apply when the flower continue at monthly	

FRUIT AND NUT CROPS (Cont.)

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Crop	Diseases	Rate of Application	
Bananas	Sigatoka 2 to 4 qts. per acre		
	SPECIFIC DIRECTIONS: Apply every 3 to 4 weeks.		
	Black pitting	5 to 8 qts. per 100 gals. of water	
	SPECIFIC DIRECTIONS: fruit stem and include the li leaf crown. Apply during th weeks after fruit emergence	Apply directly to the basal portion of the e first and second ie.	
Blueberries	Bacterial canker	8 to 10 qts. per acre	
	SPECIFIC DIRECTIONS: spreader/sticker before Fa weeks later.	Apply with a Il rains and again 4	
	Cane canker	8 to 10 qts. per acre	
	SPECIFIC DIRECTIONS: spreader/sticker before Fa weeks later. In the Spring of apply at 10- to 14-day inte emergence.	Apply with a Il rains and again 4 during wet weather, rvals beginning at leaf	
Caneberries	Anthracnose, Leaf and Cane spot, Purple blotch, Yellow rust	2 to 4 qts. per acre	
	SPECIFIC DIRECTIONS: , open. Repeat when flower continue at 10- to 14-day i	Apply when leaf buds buds show white and ntervals.	
	Anthracnose, Bacterial blight, Leaf and Cane spot, Purple blotch, Yellow rust	8 to 12 qts. per acre	
	SPECIFIC DIRECTIONS: , harvest.	Apply in the Fall after	
Cherries	Deadbud, Coryneum blight	6 qts. per 100 gals. of water	
	SPECIFIC DIRECTIONS: Apply in October (before heavy Fall rains) and again in January. Where disease is severe, another application should be applied in August.		
	Brown rot blossom blight	2 to 3 qts. per 100 gals. of water	
	SPECIFIC DIRECTIONS: spray at popcorn stage an	Apply as a full cover d at full bloom.	
Citrus	Greasy spot, Melanose, Pink pitting, Scab	0.75 to 2 qts. per 100 gals. of water Aerial Application: 6 to 8 qts. per 10 gals. of water per acre	
	SPECIFIC DIRECTIONS: A and post-bloom sprays. Ma concentrate sprays at equi	Apply as pre-bloom ay be used in valent rates.	
	Brown rot	2 to 6 qts. per acre	
	SPECIFIC DIRECTIONS: before or just after heavy rasprays, apply to a height o	Apply in the Fall ains. In areas of skirt f at least 4 ft.	
Сосоа	Black pod rot	2 to 4 qts. per acre	
	SPECIFIC DIRECTIONS: day schedule in high rainfa	Apply on a 14- to 21- ll areas.	
Coffee	Iron spot, Pink disease	2 to 8 qts. per acre	
	SPECIFIC DIRECTION: A monthly intervals at the beg season.	oply 3 applications at jinning of the wet	
	Bacterial blight, Berry spot, Leaf spot, Leaf rust	3 to 8 qts. per acre	
	SPECIFIC DIRECTIONS: recommended, usually at 3 depending upon disease s conditions.	Apply as locally - to 4-week intervals everity and rainfall	
Cranberries	Fruit rot	8 qts. per acre	
	SPECIFIC DIRECTIONS: late bloom. One or two add made at 10- to 14-day inte depending upon disease p advice of the State Agricul Service.	Apply beginning in ditional applications rvals may be required rressure. Follow the tural Extension	

Crop	Diseases	Rate of Application
Currants,	Anthracnose, Leaf spot	5 to 10 qts. per acre
00380611103	SPECIFIC DIRECTIONS: starting after harvest, before	Make 3 applications bre bloom and after petal
Filberts	Bacterial blight	10 to 12 qts. per acre
	SPECIFIC DIRECTIONS: Under severe conditions, fourths of the leaves have	Apply after harvest. apply again when three- dropped.
	Eastern filbert blight	10 to 12 qts. per acre
	SPECIFIC DIRECTIONS: after harvest in October b The next application shou February to early March fo application 1 month later. sticking agent or superior water. Use higher rates w disease pressure is high.	Make initial application efore heavy rains begin, id be made in late blowed by another If desired, add 1 pt. of a type oil per 100 gals. of hen rainfall is heavy and
Grapes	Anthracnose, Black rot, Downy mildew, Powdery mildew	2 qts. per acre
	SPECIFIC DIRECTIONS: break, when the shoots at after bloom and every 4-1 season as needed. Foliar copper-sensitive varieties	Apply just before bud re 6 to 8 inches long, just to 10-days throughout injury may occur on
Hops	Downy mildew	2 qts. per acre
	SPECIFIC DIRECTIONS: day intervals. Begin with o pruning but before training weeks before harvest.	Apply as needed at 10- crown treatment (after g) and continue until 2
Kiwi	Pseudomonas syringea, Erwinia herbicola, Pseudomonas fluorescens	8 qts. in 200 gals. of water per acre
	SPECIFIC DIRECTIONS: monthly basis. A maximum be made.	Make applications on a n of 3 applications may
imes	Greasy spot	8 qts. per acre
	SPECIFIC DIRECTIONS: continue at monthly intervi	Apply in June and als through August.
langos	Anthracnose	8 qts. per acre
	SPECIFIC DIRECTIONS: time the panicles are 2 in fruits are set and monthly	Apply weekly from the ches in length until all thereafter until August.
)lives	Peacock spot	8 to 12 qts. per acre OR 2 to 3 qts. per 100 gals. of water
	SPECIFIC DIRECTIONS: before Winter rains fall. A should be made in early S severe.	Make first application second application pring if disease is
Peaches, Nectarines	Bacterial spot	2 qts. per 100 gals. of water
	SPECIFIC DIRECTIONS: spray. Make post-bloom a pt. per 100 gais. at first a DO NOT spray later than DO NOT use at rates abo Note: Slight defoliation a may occur from use in com	Apply as a dormant pplication. Apply at 0.5 nd second cover sprays. 3 weeks prior to harvest, ve those recommended. nd spotting of leaves ver sprays.
	Blossom brown rot	8 to 12 gts per acre
	SPECIFIC DIRECTIONS: layed-dormant spray. Can oil. DO NOT apply at or a	Apply as dormant or de- use with dormant spray fter full bloom.
	Leaf curi, Shot hole	8 to 12 qts. per acre
	SPECIFIC DIRECTIONS: protect buds and shocts rainy periods. Reapply up NOT apply after full bloom	Apply at leaf fail to rom infection during until late bud swell. DO
Pears, Quince	Fire blight	1 to 2 qts. per acre
	SPECIFIC DIRECTIONS: repeat at 5- to 7-day inter bloom period. Do not use varieties.	Apply at 10% bloom and vals throughout the on copper sull sitive
	Blossom blast	8 to 12 gts. per acre
	SPECIFIC DIRECTIONS: spray. Apply only at bud b infection.	Apply as a dormant reak to control primary

(Continued) KOP-AM Complex Page 3 of 7

FRUIT AND NUT CROPS (Cont.)

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Crop	Diseases	Rate of Application		
Pecans	Shuck and Kernel rot, 4 to 10 qts. per acr Zonate leaf spot			
	SPECIFIC DIRECTIONS: For suppression, apply in sufficient water to ensure complete spray coverage at 2- to 4-week intervals starting at kernel growth and continuing until shucks open. Use the higher rate and shorter interval if frequent rainfall occurs.			
Pistachios	Alternaria late blight	8 to 12 qts. per acre		
	SPECIFIC DIRECTIONS: # bloom followed by up to 3 intervals.	SPECIFIC DIRECTIONS: Apply at 50% and full bloom followed by up to 3 applications at 30-day intervals.		
	Botrytis blight, Botryo- sphaeria panicle, Shoot blight, Septoria leaf blight	8 to 12 qts. per acre		
	SPECIFIC DIRECTIONS: Make initial application at bud swell and repeat on a 14- to 28-day schedule as dictated by disease conditions. If disease conditions are severe, use the higher rate and shorter interval.			
Plums, Prunes	Brown rot blossom blight, Coryneum blight (shot hole)	8 to 12 qts. per acre		
	SPECIFIC DIRECTIONS: Apply as a dormant spray before heavy rains begin. For Brown rot, apply at early green bud to full popcorn stages.			
	Bacterial blast, Bacterial canker	8 to 12 qts. per acre		
	SPECIFIC DIRECTIONS: Apply at dormant to early pink stage. Where disease is severe, apply 1 qt. at 2-week intervals post-bloom. Slight leaf injury may occur.			
Walnuts	Walnut blight	8 to 12 qts. per acre		
	SPECIFIC DIRECTIONS: Make first application at early pre-bloom. Make second application at late pre-bloom. Make additional applications if disease conditions persist.			

FIELD AND VEGETABLE CROPS

Crop	Diseases	Rate of Application	
Alfalfa	Leaf spot	1 to 2 qts. per acre	
	SPECIFIC DIRECTIONS: air 10 to 14 days prior to injury may occur to sensiti	Apply by ground or harvest. Slight ve varieties.	
Beans, Lentils, Peas (succulent	Bacterial blight (halo and common)	1 to 3 qts. per acre	
and dry)	SPECIFIC DIRECTIONS: Apply when plants are 3 to 5 inches high and before diseases appear. Repeat at 7- to 10-day intervals or 5- to 7-day intervals under severe disease pressure.		
Beets, Sugar beets	Cercospora leaf spot	1.5 to 3 qts. per acre	
	SPECIFIC DIRECTIONS: disease appears making 10- to 14-day intervals. Ap frequently under severe di	Apply when 3 to 6 sprays at pply more sease pressure.	
Carrots	Early and Late blight	2 to 3 qts. per acre	
	SPECIFIC DIRECTIONS: are 6 inches high. Make 3 at 7- to 10-day intervals.	Apply when plants to 5 applications	
Сејегу	Bacterial blight, Early and Late blight	2 to 3 qts. per acre	
	SPECIFIC DIRECTIONS: . plants are established in t at 5- to 7-day intervals.	Apply as soon as he field and repeat	
Corn (field, pop, sweet)	Bacterial rot, Bacterial stripe, Bacterial wilt, Leaf blight, Stalk rot	2 qts. per acre	
	SPECIFIC DIRECTIONS: disease appears and repe	Apply when at as necessary.	
Crucifers (Broccoli, Brussels sprouts,	Black leaf spot, Black rot	1 to 3 qts. per acre	
Cabbage, Cauli- flower, Greens (collard, mustard, turnip)]	SPECIFIC DIRECTIONS: Apply by ground or air when disease appears and repeat at 7- to 10-day intervals.		
	Downy mildew	0.5 to 1 qt. per acre	
	SPECIFIC DIRECTIONS: Apply by ground or air when disease appears and repeat at 7- to 10-day intervals		

Cran	Diesses	Rate of	
Crop Cucurbits, (Cantaloupe, Cucumber, Honeydew, Muskmelon, Pumpkin, Squash, Watermelon)	Alternaria leaf spot, Angular leaf spot, Anthracnose, Downy mildew, Powdery mildew, Gummy stem blight, Watermelon bacterial fruit blotch	Application 1.5 to 2 qts. per acre	
	SPECIFIC DIRECTIONS: or air when disease appe 7- to 10-day intervals.	Apply by ground ears and repeat at	
Eggplant	Alternaria blight, Anthracnose, Phomopsis	2 qts. per acre	
	SPECIFIC DIRECTIONS: disease appears and rep intervals.	Apply before eat at 7- to 10-day	
Dnions	Downy mildew, Purple blotch	2 qts. per acre	
	SPECIFIC DIRECTIONS: are 4 to 6 inches high an 10-day intervals.	Apply when plants d repeat at 7- to	
Peanuts	Cercospora leaf spot	1.5 to 3 qts. per acre	
	SPECIFIC DIRECTIONS: appearance of disease a 14-day intervals.	Apply on first nd repeat at 10- to	
	Pod rot complex (Pythium myriotylum, Rhizoctonia solani and Sclerotium rolfsii)	12 qts. per acre	
	SPECIFIC DIRECTIONS: in a 12- to 15-inch band	Apply at pegging over the row.	
eppers	Bacterial spot, Cercospora leaf spot	1.5 to 3 qts. per acre	
	SPECIFIC DIRECTIONS: application upon emerger immediately after transpla at 7- to 10-day intervals. severe, apply at 4- to 5-d Note: Disease control is fruiting.	Make first nce of seedlings or anting and repeat When disease is ay intervals. critical during	
Potatoes	Early and Late blight	1.5 to 3 qts. per acre	
	SPECIFIC DIRECTIONS: appearance of disease a to 10-day intervals.	Apply on first nd continue on 7-	
pinach	Anthracnose, Cercospora leaf spot, Downy mildew	1.5 qts. per acre	
	SPECIFIC DIRECTIONS: appearance of disease a 10-day intervals.	Apply on first nd repeat at 7- to	
Strawberries	Leaf spot, Scorch	1.5 to 2 qts. per acre	
	SPECIFIC DIRECTIONS: day intervals from the tim starts until harvest.	Apply at 7- to 10- e new growth	
lobacco	Angular leaf spot	4 to 5 qts. per acre	
	SPECIFIC DIRECTIONS: Apply on 7- to 10-day basis when disease appears. Destroy all infected plants.		
	Blue mold	2 qts. per acre	
	SPECIFIC DIRECTIONS: 10 days when disease ap	Apply every 7 to pears.	
	Brown spot	4 to 5 qis, per anre	
	SPECIFIC D/PECT/CNS: Apply every 7 to 10 days when dispase appears.		
	Damping-off disease	5 to 6 q.s. per acre	
	SPECIFIC DIRECTIONS: bed after planting Avoid	Apply to the seed overwatching.	
	Frog eye diseasa+ +	4 to 3 qts. per	
		Apply just pofers	
	transplanting and when to	opped.	

(Continued)

FIELD AND VEGETABLE CROPS (Cont.)

Сгор	Diseases	Rate of Application		
Tomatoes	Bacterial speck, Bacterial spot, Early and Late blight	1.5 to 3 qts. per acre		
	SPECIFIC DIRECTIONS: Make first application upon emergence of seedlings or immediately after transplanting and repeat at 7- to 10-day intervals. When disease is severe, apply at 4- to 5-day intervals. Complete coverage is essential for disease control. Note: While the labeled rate is particularly effective against Bacterial spot, a tank mix with Maneb or Mancozeb used at the labeled rates controls a broad range of diseases.			
Wheat, Oats, Barley	Helminthosporium spot blotch, Septoria leaf blotch	1.5 to 2 qts. per acre		
	SPECIFIC DIRECTIONS: Apply at early heading and follow with second spray 10 days later. Use the higher rate when conditions favor disease.			
	Bacterial wilt, Head scab 2 qts. per			
	SPECIFIC DIRECTIONS: Apply when disease appears and repeat as necessary.			

MISCELLANEOUS

Сгор	Diseases	Rate of Application	
Atemoyas, Carambolas	Anthracnose	3 qts. per acre	
	SPECIFIC DIRECTIONS: Make initial application just before flowering and repeat on a weekly schedule until just before harvest. Apply in sufficient water for thorough coverage.		
Chives	Downy mildew	2 qts. per acre	
	SPECIFIC DIRECTION: Begin application when plants are first established in the fi Repeat applications every 7 to 10 days dictated by disease conditions. If diseas pressure is high, use the shorter spray in		
Dill	Phoma leaf spot, Rhizoctonia foliage blight	3 qts. per acre	
	SPECIFIC DIRECTIONS: E when plants are first estable and repeat at 7- to 10-day upon disease severity and conditions. If disease press shorter spray interval.	egin applications ished in the field intervals depending environmental sure is high, use the	
Douglas fir	Rhabdocline needlecast	2 qts. per acre	
	SPECIFIC DIRECTIONS: Begin applications at bud break and repeat at 3- to 4-week intervals. Apply in a tank mix with another registered pesticide if moderate to severe disease pressure is present.		
Ginseng	Alternaria leaf and stem blight	3.5 qts. per acre	
	SPECIFIC DIRECTIONS: Use as a tank mix with 2 lbs. Rovral 50W in 100 gallons of water. Begin applications of this tank mix as soon as plants have emerged in Spring. Applications should be repeated every 7 days until plants become dormant in Fall. If scheduled application is to be before a rain shower, apply fungicides at least 8 hours before the rain, giving the fungicides time to dry on the plants. Use of a spreader-sticker is advised. Note: Alternaria leaf and stem blight are most severe in humid conditions such as those found in the dense canopies of 2-, 3- and 4- year old Ginseng. It is very important that the stems be thoroughly covered with fungicide; therefore, use a spray apparatus which distributes the fungicide throughout the canopy.		
Guava	Anthracnose, Red algae	3 qts. per acre	
	SPECIFIC DIRECTION: Make initial application just before flowering and repeat on a weekly schedule until just before harvest. Apply in sufficient water for thorough coverage.		
Litchi	Anthracnose	3 qts. per acre	
	SPECIFIC DIRECTION: Make initial application just before flowering and repeat on a weekly schedule until just before harvest. Apply in sufficient water for therough coverage		

Crop	Diseases	Rate of Application	
Live Oak	Ball moss	6 qts. per acre	
	SPECIFIC DIRECTIONS: Apply in the Spring when Ball moss is actively growing, using 1.5 gais. of spray per ft, of tree height. Make sure to wet Ball moss tufts throrughly. A second application may be required after 12 months. Note: This product may be injurious to omamentals grown under Live oaks. This product may be reactive on metai and masonry surfaces such as galvanized roofing. Avoid contact with metal surfaces. Do not spray on cars, houses, lawn furniture, etc.		
Macadamia	Anthracnose	6 qts. per acre	
	SPECIFIC DIRECTIONS: I sign of flowering and repea schedule until just before h sufficient water for thorough	nitiate spray at first It on a weekly arvest. Apply in 1 coverage.	
	Phytopthora blight, Raceme blight	4 to 6 qts. per acre	
	SPECIFIC DIRECTIONS: A Raceme development and Apply in sufficient water for	Apply during bloom periods. thorough coverage.	
Marney sapote	Anthracnose, Algal leaf spot	6 to 8 qts. per acre	
	SPECIFIC DIRECTIONS: Apply when conditions favor disease. Repeat on 14- to 30- day schedule as disease severity and environmental conditions dictate.		
Papayas	Anthracnose	4 to 10 qts. per acre	
	SPECIFIC DIRECTIONS: Begin applications before disease appears and repeat at 10- to 14-day intervals. Apply at 5- to 7-day intervals during periods of heavy rainfall. Use higher rates when conditions favor disease.		
Parsley	Bacterial blight	3 qts. per acre	
	SPECIFIC DIRECTIONS: E when plants are first establ and repeat at 5- to 7-day ir upon disease severity and conditions.	SPECIFIC DIRECTIONS: Begin applications when plants are first established in the field and repeat at 5- to 7-day intervals depending upon disease severity and environmental conditions.	
Passion fruit	Anthracnose	6 qts. per acre	
	SPECIFIC DIRECTIONS: N application just before flows a weekly schedule until just Apply in sufficient water for	SPECIFIC DIRECTIONS: Make initial application just before flowering and repeat on a weekly schedule until just before harvest. Apply in sufficient water for thorough coverage.	
Sugar apples (annona)	Anthracnose	8 to 12 qts. per acre	
	SPECIFIC DIRECTIONS: N application just before flow a weekly schedule until just Apply in sufficient water for	Aake initial ering and repeat on before harvest. thorough coverage.	
Sycamore	Anthracnose	2 to 3 qts. per acre	
	SPECIFIC DIRECTIONS: A coverage spray. Apply in 10 sufficient volume for thoroug first application at bud crac application 7 to 10 days lat expansion.	pply as a full 00 gals. of water or gh coverage. Make k and second er 라기U% leaf	

7/10

CITRUS (Field Nursery Grown)

To control Brown rot, Citrus canker (suppression), Greasy spot, Melanose, Pink pitting and Scab, apply 2 quarts of this product per 100 gallons of water (4 to 8 quarts per acre). Apply this product at 28-rtay intervals or as needed depending on disease severity.

TURFGRASS

To control Algae in Turfgrass, apply 1 ritt of this product per 1,000 square feet in 5 gallons of water. This product may be used alone or in combination with other registered fungicides as a maintenance spray. Observe all precautions and limitations on the label of each product used in tank mixes.

Note: Phytotoxicity may occur depending upon varia: al differences. Apply the recommended rate to a small area and observe for 7 to 10 days for signs of injury. If phytotoxicity occurs, discontinue use. Do not apply in a spray solution with a pH of less than 6.5.

GREENHOUSE AND SHADE HOUSE CROPS

Notice to User: This product may be used in greenhouses and shade houses to control diseases on some crops which appear on this label. The grower should bear in mind that the sensitivity of crops grown in greenhouses and shade houses differ greatly from crops grown under field conditions. Neither the Manufacturer nor the Seller has determined whether or not this product can be used safely on all greenhouse and shade house-grown crops. The user should determine if this product can be used safely prior to commercial use. In a small area, apply the recommended rates to the plants in question, i.e., foliage, fruit, etc., and observe for 7 to 10 days for symptoms of phytotoxicity prior to commercial use.

Crop	Diseases	Rate of Application	
Eggplant	Alternaria blight, Anthracnose, Phomopsis	4 tbsps.per 1,000 sq.ft.	
	SPECIFIC DIRECTIONS: Begin applications prior to development of disease symptoms. Repeat spray at 7- to 10-day intervals or as disease pressure dictates.		
Peppers	Bacterial spot	4 to 6 tbsps.per 1,000 sq.ft.	
	SPECIFIC DIRECTIONS: Begin applications when conditions first favor disease development and repeat at 5- to 10-day intervals as needed depending on disease severity. Use higher rate for severe disease.		
Tomatoes	Early and Late blight	4 to 6 tbsps. per 1,000 sq. ft.	
	SPECIFIC DIRECTIONS: Begin applicati when disease first threatens and repeat a 10-day intervals or as needed depending disease severity. Use higher rate for seve disease.		
	Bacterial speck	4 to 6 tbsps. per 1,000 sq. ft.	
	SPECIFIC DIRECTIONS: Begin application when disease first threatens and repeat at 10-day intervals or as needed depending of disease severity.		
	Anthracnose, Bacterial spot, Gray leaf mold, Septoria leaf spot	4 to 8 tbsps. per 1,000 sq. ft.	
	SPECIFIC DIRECTIONS: Begin applications when disease first threatens and repeat at 7- to 10-day intervals or as needed depending on disease severity. Use higher rate for severe disease.		
Citrus (non- bearing nursery)	Brown rot, Citrus canker, Greasy spot, Melanose, Pink pitting, Scab	6 tbsps. per 1,000 sq. ft.	
SPECIFIC DIRECTIONS: Begin application when disease threatens. Repeat at 30-day intervals or as needed depending on disea severity.			

ORNAMENTALS

Notice to User: Plant sensitivities to this product have been found to be acceptable in specific genera and species listed on this label; however, it is impossible to know sensitivities under all conditions and phytotoxicity may occur. Due to the large number of species and varieties of ornamentals and nursery plants, it is impossible to test every one for sensitivity to this product. Neither the Manufacturer nor Seller recommends use upon species not listed on the label, nor has it been determined that this product can be safely used on ornamental or nursery plants not listed on this label. The user should determine if this product can be used safely prior to commercial use.

Use this product on container, bench or bed-grown ornamentals in greenhouses, shade houses or outdoor nurseries, for professional use on ornamentals grown in indoor and outdoor landscaping and for control of bacterial and fungal diseases of foliage, flowers and stems. Apply as a thorough coverage spray using 1 quart of this product per 100 gallons of water. Begin application at first sign of disease and repeat at 7-to 14-day intervals as needed. Use shorter interval during periods of frequent rains or when severe disease conditions persist.

This product may be used alone or in combination with other registered fungicides as a maintenance spray. Observe all precautions and limitations on the label of each product used in tank mixes.

Note: Do not tank-mix this product with Aliette fungicide unless appropriate precautions have been taken to buffer the spray solution. Severe phytotoxicity may result if adequate precautions are not taken.

Crop, Latin name, Disease

Althaea (Rose of Sharon), Hibiscus syriacus, Bacterial leaf spot. Aralla Dizygotheca elegantissima, Xanthomonas leaf spot, Cercospora leaf spot, Alternaria. Arborvitae, Thuja spp., Alternaria twig blight, Cercospora leaf blight. Azalea', Rhododendron spp., Cercospora leaf spot, Botrytis blight, Phytophthora dieback, Powdery mildew. Begonia, Begonia semperflorens, Bacterial leaf spot (Xanthomonas sp., Erwina sp., Pseudomonas sp.). Bougainvillea, Bougainvillea spectabilis, Anthracnose, Bacterial leaf spot. Bulbs (Tullp, Gladiolus), Miscellaneous, Anthracnose, Botrytis blight. Camellia, Camellia japonica, C. sasangua, Anthracnose, Bacterial leaf spot. Camphor tree, Cinnamomum camphora, Pseudomonas leaf spot. Canna, Canna spp., Pseudomonas leaf spot. Carnation1, Dianthus spp., Alternaria blight, Pseudomonas leaf spot, Botrytis blight. Chinese tallow tree, Sepium sebiferum, Bacterial leaf spot (Xanthomonas sp., Pseudomonas sp.). Chrysanthemum1, Chrysanthemum morifolium, Septoria leaf spot, Botrytis blight. Cotoneaster, Cotoneaster spp., Botrytis blight, Dahlla, Dahlia pinnata, Alternaria leaf spot, Botrytis gray mold, Cercospora leaf spot. Date palm, Phoenix canariensis, Pestalotia leaf spot. Dianthus, Dianthus spp., Bacterial spot. Bacterial soft rot. Dogwood, Cornus florida, Anthracnose. Dusty miller, Senecio cineraria, Bacterial leaf spot (Pseudomonas chichorii). Easter Illy², Lilium longiflorum, Botrytis blight, Echinacea, Echinacea spp., Bacterial leaf spot (Pseudomonas cichorii). Elm "Drake", Ulmus parvifolia, Xanthomonas leaf spot. Euonymus, Euonymus spp., Botrytis blight, Anthracnose, European fan palm, Chamaerops humilis, Pestalotia leaf spot. Gardenia, Gardenia jasminoides, Alternaria leaf spot, Botrytis bud rot, Cercospora leaf spot. Geranium, Pelargonium spp., Alternaria leaf spot, Botrytis gray mold, Cercospora leaf spot. Gladiolus, Gladiolus spp., Alternaria leaf spot, Botrytis gray mold, Bacterial leaf blight, Goldenrain tree, Koelreuteria paniculata, Bacterial leaf spot. Hibiscus, Hibiscus rosa-sinensis, Bacterial leaf spot. Holly fern, Cyrtomium falcatum, Pseudomonas leaf spot. Impatiens, Impatiens sallerana, Bacterial leaf spot. India hawthorn³, Rhaphiolepis indica, Anthracnose, Entomosporium leaf spot. Ivy (English, Algerian)¹, Hedera helix, H. canariensis, Xanthomonas leaf spot. Ixora, Ixora coccinea, Xanthomonas leaf spot. Juniper (Eastern red cedar), Juniperus virginiana, Anthracnose, Lantana, Lantana camara, Bacterial leaf spot. Lllac, Syringa spp., Cercospora leaf spot. Lobiolly bay, Gordonia lasianthus, Anthracnose. Loquat, Eriobotrya japonica, Entomosporium maculata, Colletotrichum sp. Magnolia (Saucer), Magnolia soulangiana, Bacterial leaf spot. Magnolia (Southern), Magnolia grandiflora, Algal leaf spot, Anthracnose, Bacterial leaf spot. Magnolla (Sweet bay), Magnolia virginiana, Anthracnose, Mandevillas, Mandevilla spp., Anthracnose. Marigold, Tagetes spp., Alternaria leaf spot, Botrytis leaf and flower rot, Cercospora leaf spot. Mulberry, weeping, Morus alba, Bacterial leaf spot. Oak, Laurel, Quercus laurifolia, Algal leaf spot (Cephaleuros virescens). Oleander, Nerium oleander, Bacterial leaf spot, Fungal leaf spot. Pachysandra, Pachysandra procumbens, Volutella leaf blight. Pansy, Viola spp., Downy mildew. Pear (Flowering), Pyrus callervana, Fireblight, Leaf spot. Pentas (Egyptian star), Pentas spp., Bacterial leaf spot (Xanthomonas sp.). Peony, Paeonia spp., Botrytis blight. Periwinkle, Catharanthus roseus, Vinca spp., Phomopsis stem blight, Philodendron, Philodendron selloum, Bacterial leaf spot, Phiox, Phlox spp., Alternaria leaf spot. Photinia, Photinia fraseri, P. glabra, Anthracnose, Entomosporium. Pistachio, Pistacia chinensis, Anthracnose. Plantain Illy, Hosta spp., Bacterial leaf spot. Powder puff plant, Calliandra spp., Bacterial leaf spot. Pyracantha, Pyracantha spp., Fireblight, scab. Queen palm, Syagrus romanzoffianum, Exosporium leaf spot, Phytophthora bud rot. Rhododendron. Rhododendron spp., Alternaria flower spot. Rose¹, Rosa spp., Powdery mildew, Black spot. Verbena, Verbena spp., Xanthomonas leaf spot. Viburnum, Viburnum odoratissimum, V. suspensum, Anthracnose. Washingtonia palm, Washingtonia robusta, Pestalotia leaf spot. Weeping willow, Salix babylonica, Anthracnose. Yucca (Adam's needle), Yucca spp., Cercospora leaf spot, Septoria leaf spot.

FROST INJURY PROTECTION

Bacterial ice Nucleation Inhibitor--Application of this product made to all crops listed on this label at rates indicated on this label, just prior to anticipated frost conditions, will sustain control of ice nucleating bacteria (Pseudomonas syringae, Erwina herbicola and Pseudomonas fluorescens) and may therefore provide protection, against light frost. Not recommended for those geographic areas where weather conditions favor severe frost.

TREATMENT OF WOOD BASED COMPUSITES

For treatment of composite wood products for protection from fungal decay and termite attack, this product can be applied to the furnish (fiber, flakes, chips, particles or strands) either as a solution concentrate or, alternately, diluted. with water. The reight percent loading on the furnish should range from 1.0% w/w to 4.0% w/w as copper ammonium acetate complex (0.26 to 1.1% copper metal). The actual amount of copper ammonium acetate complex to make the composite, the desired distribution of this product in the composite and the anticipated exposure conditions end use of the composite wood product. Consult manufacturer for recommendations on specific products and applications.

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Apply the treatment solution by spraying the composite wood component with a low-pressure sprayer. A moderately fine spray, not an aerosol or fog, generally provides the best coverage. Apply in a commercial spray booth. Treatment solution may also be applied by immersing the composite wood components. Immersion systems should be fully contained to recycle any excess solution.

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 in 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 cross-contamination. Store in original containers only. 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. Do not allow runoff to enter sewer or contaminate water supplies.
- 6. Dispose of wastes as indicated below:

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: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by incineration or, if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

WARRANTY-CONDITION OF SALE

OUR RECOMMENDATIONS 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 recommended and other influencing factors in the use of this product are beyond the control of the Seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

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.

¹ Discoloration of foliage and/or blooms has been noted on some varieties. To prevent residues on commercial plants, do not spray just before selling season.
² Apply this product at 3 to 5 quarts per acre in 20 to 100 gallons of water per acre.

Apply this product at 3 to 5 quarts per acre in 20 to 100 gallons of water per acre.
 For India Hawthorn, use 2 to 4 quarts per 100 gallons or 2 to 4 level tablespoons per gallon.



Drexel Chemical Company March 4, 2002

> Document Processing Desk (FINAL) Office of Pesticide Programs (7504C) U.S. Environmental Protection Agency Rm 266A, Crystal Mall 2 1921 Jefferson Davis Hwy. Arlington, VA 22202

ATTN: Ms. Cynthia Giles-Parker, PM 22/Fungicide Branch

Re: Submission of Final Printed Label per EPA's Letter Dated February 19, 2002 DREXEL KOP-AM COMPLEX (EPA Reg. No. 19713-509)

Dear Ms. Parker,

Reference is made to the above. Herewith, please find:

- 1. Completed EPA Form 8570-1.
- 2. One (1) copy of the final printed label (509SP-0302++) for your record and file. Please take note of the following corrections per your 2/19/2002 letter plus some others:
 - The name of NPTC was changed to its new name, National Pesticide Information Center.
 - * 'made of waterproof material' was added after 'chemical-resistant gloves' in under PPE and in the Agricultural Use Requirements box.
 - 'other' was inserted before aquatic organisms under the Environmental Hazards section.
 - Instead of deleting the first sentence under 'Chemigation' we have restated it to read "Do not apply this product through any irrigation system unless this section on chemigation is followed."
 - Under Container Disposal in the Storage and Disposal box, 'by' was added before 'incineration'.
- 3. Certification Statement per PR Notice 98-10.

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370. My e-mail address is <u>lpiwonka@drexchem.com</u>.

Thank you.

Respectfully, DREXEL CHEMICAL COMPANY

Cr. ITWas Luz G Piwonka

Luz G Piwonka Registration Manager