

19713-518

12-20-2001

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

 Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-518	2. EPA Product Manager DR. AKIVA ABRAMOVITCH	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL CHLORPYRIFOS TERMITICIDE Concentrate	PM# Insecticide-Rodenticide 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

NOTIFICATION

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated DEC 20 2001
<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.)

A copy of the label (518SP-1001) with a revised 'Pesticide Storage statements is submitted. Details of the change is presented on the cover letter accompanying this submission. The required Certification Statement is also submitted, herewith. Thank you.

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
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
			No. per container	<input type="checkbox"/> 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 PIWONKA		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 <i>Luz G Piwonka</i>			3. Title REGISTRATION MANAGER		
4. Typed Name LUZ G PIWONKA			5. Date 10/2/2001		



Drexel Chemical Company

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October 2, 2001

***Submission of Revised Label per PR Notice 98-10
DREXEL CHLORPYRIFOS TECHNICAL Concentrate (EPA Reg. No. 19713-518)***

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 PIWONKA
Registration Manager

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RESTRICTED USE PESTICIDE

For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.



NOTIFICATION

DEC 20 2001

Chlorpyrifos Termiticide

Concentrate

ACTIVE INGREDIENT:

Chlorpyrifos: 0,0-diethyl 0-(3,5,6-trichloro-2-pyridyl) phosphorothioate 44.9%

OTHER INGREDIENTS: 55.1%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING / AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

SHAKE WELL BEFORE USING

EPA Reg. No. 19713-518

EPA Est. No. 19713-GA-1

Net Contents: _____

FIRST AID

IF SWALLOWED: Call a physician or poison control center immediately. Do not induce vomiting. Contains an aromatic petroleum solvent. Do not give anything by mouth to an unconscious person.

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention immediately.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate degree of exposure (baseline data are useful). Atropine, only by injection, is the preferable antidote. Oximes such as 2-PAM/protopam may be therapeutic if used early; however, use only in conjunction with atropine. In case of severe, acute poisoning, use antidotes immediately after establishing an open airway and respiration.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: May be fatal if swallowed. May be harmful if absorbed through skin or clothing. Do not get in eyes, on skin or clothing. Avoid breathing vapors or spray mist. Wash thoroughly after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse. Keep away from food, feedstuffs and water supplies.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds and wildlife and extremely toxic to fish and aquatic invertebrates. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in adjacent aquatic sites. Cover or incorporate spills. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame. Do not cut or weld container.

DIRECTIONS FOR USE RESTRICTED USE PESTICIDE

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

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers and loaders must wear: Long-sleeved shirt and long pants, chemical-resistant footwear plus socks, chemical-resistant gloves such as Nitrile or Butyl, and protective eyewear (goggles, face shield or safety glasses with front, brow and temple protection). Mixers and loaders who do not use a mechanical system (such as an in-line injector) to transfer the contents of this container must wear coveralls or chemical-resistant apron in addition to the other required PPE.

Pesticide applicators must wear long-sleeved shirt and long pants, shoes plus socks, chemical-resistant gloves such as Nitrile or Butyl.

When working in a non-ventilated space, all pesticide handlers (mixers, loaders and applicators) must wear a respiratory protection device (MSHA/NIOSH approval number prefix TC-21C or a NIOSH approved respirator with any N, R, P or HE filter) and protective eyewear when applying termiticide by rodding or subslab injection.

SUBTERRANEAN TERMITES

CHLORPYRIFOS TERMITICIDE CONCENTRATE for soil treatment is used to establish a barrier which is lethal to Termites. The chemical emulsion must be adequately dispersed in the soil to provide a barrier between wood in the structure and the Termite colonies in the soil. It is necessary for the effective use of this product that the service technician be familiar with current control practices including trenching, rodding, subslab injection and low pressure spray applications. These techniques must be correctly employed to prevent or control infestations by subterranean Termite species of *Reticulitermes*, *Zootermopsis*, *Coptotermes* and *Heterotermes*.

Choice of appropriate procedures includes consideration of such variable factors as the design of the structure, water table, soil type, soil compaction, grade conditions and the location and type of domestic water supplies.

The biology and behavior of the involved termite species are important factors to be known as well as suspected location of the colony and severity of the infestation within the structure to be protected. For advice concerning current control practices for specific local conditions, consult resources in structural pest control.

GENERAL USE PRECAUTIONS

All non-essential wood and cellulose-containing materials, including scrap wood and form boards, should be removed from around foundation walls, crawl spaces and porches. This does not include existing structural soil contact wood that either has been or needs to be treated.



Manufactured For:
Drexel Chemical Company

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

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When treating adjacent to an existing structure, the applicator must check the areas to be treated, and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during spot treatments in existing structures must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the cleanup is completed.

Re-treatment for subterranean Termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping, and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be re-treated in accordance with application techniques described in this product's labeling. The timing and type of these re-treatments will vary depending on factors such as Termite pressure, soil types, soil conditions and other factors that may reduce the effectiveness of the barrier. Annual re-treatment of the structure is prohibited unless there is clear evidence that reinfestation or barrier disruption has occurred. Only spot treatments are allowed. Spot treatments must not exceed 25% of the amount required to treat the entire structure at the labeled rate. Treated areas must be inspected annually for signs of reinfestation.

Contamination of public and private water supplies must be avoided by following these precautions:

1. Use anti-backflow equipment or procedures to prevent siphonage of pesticide back into water supplies.
2. Do not treat soil that is water-saturated or frozen.
3. Do not treat while precipitation is occurring.
4. Do not contaminate wells or cisterns. See specific "TREATMENT OF STRUCTURES WITH WELLS, CISTERNS OR OTHER BODIES OF WATER ADJACENT TO TREATED SITES" section on this label.
5. Consult Federal, State and Local specifications for information regarding approved treatment practices in your area.

RATE DETERMINATION GUIDELINES

Consult the local extension agent or state entomologist for application rate recommendations.

TABLE 1 Dilution Rates For This Product	
Gals. of finished dilution desired	0.5%
1	1½ fl. ozs.
5	6½ fl. ozs.
10	13½ fl. ozs.
24	1 qt.
48	½ gal.
97	1 gal.

MIXING DIRECTIONS

It is important that the termiticide dilution be uniformly mixed in the spray tank before beginning the treatment. Once mixed, this product will not settle out in the tank although the initial mixing will be enhanced by agitation, circulation through the treating hose and the filling process.

1. Fill tank ¼ to ½ full.
2. Start pump to begin bypass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of this product.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

APPLICATION VOLUME

To provide maximum control and protection against Termite infestation, apply the specified volume of the finished water emulsion and active ingredient as set forth in the "DIRECTIONS FOR USE" section of this label. If soil will not accept the labeled application volume, such as Heavy, Clay-type soils, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same. This would also apply to sensitive areas and/or horizontal applications where less volume may be desirable. Minimum volumes will be specified in the appropriate use directions. In Light textured soils such as Sand or Gravel that accept larger amounts of water, increased volumes that deliver the appropriate concentration of termiticide in the soil may be used. Maximum volumes will be specified in the appropriate use directions.

Note: Large reductions of application volume reduce the ability to obtain a continuous barrier. Variance is allowed when volume and concentration are consistent with label-directed rates and a continuous barrier can still be achieved.

TREATMENT OF STRUCTURES WITH WELLS, CISTERNS OR OTHER BODIES OF WATER WITHIN OR ADJACENT TO TREATED SITES
Do not contaminate wells or cisterns.

1. **Structures with Wells/Cisterns Inside Foundations:** Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:
 - Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method may be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:
 - a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
 - b) Treat the soil at the rate of 4 gallons of dilute emulsion per 10 linear feet per foot of depth of the trench or 1 gallon per 1.0 cubic feet of soil (see "MIXING DIRECTIONS" section of this label). Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
 - c) After the treated soil has absorbed the diluted emulsion, replace the soil into the trench.
2. **Structures with Adjacent Wells/Cisterns and/or Other Water Bodies:** Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams and other bodies of water, and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.
 - a) Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure if they enter the structure within 3 feet of grade.
 - b) Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
 - c) When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

PRE-CONSTRUCTION SUBTERRANEAN TERMITE TREATMENT

PRE-CONSTRUCTION TREATMENT: Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to installation of the finished grade. Pre-construction applications are defined as those applications made prior to the finished grade being installed. Effective pre-construction subterranean Termite control requires the establishment of an unbroken vertical and/or horizontal chemical barrier between wood in the structure and the Termite colonies in the soil. Follow state and local regulations to meet minimum treatment standards for preventative pre-construction treatment. Areas treated must be reinspected annually for signs of reinfestation.

Prior to each application, applicators must notify the general contractor, construction superintendent or similar responsible party of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

See "RATE DETERMINATION GUIDELINES" and "TABLE 1" for dilution directions.

1. For horizontal barriers, applications shall be made using a low pressure spray (not to exceed 50 psi when measured at the treating tool to minimize exposure and potential for drift) after grading is completed and prior to the pouring of the slab of footing (see "APPLICATION VOLUME" section). For a 0.5% rate, apply 1 gallon of dilution per 10 square feet, or use 1½ fluid ounces of this product per 10 square feet in sufficient water (not less than ½ gallon or more than 2 gallons) to provide thorough and continuous coverage of the area being treated (see "APPLICATION VOLUME" section).
 - a) If the fill is washed gravel or other coarse material, it is important that a sufficient amount of dilution be used to reach the soil substrate beneath the coarse fill.
 - b) If concrete slabs cannot be poured over the soil the same day it has been treated, a vapor barrier should be placed over the treated soil to prevent disturbance of the termiticide barrier.
2. For vertical barriers, apply at a rate of 4 gallons per 10 linear feet per foot of depth. Establish vertical barriers in areas such as around foundations, plumbing lines, backfilled soil against foundation walls and other areas that may warrant more than just a horizontal barrier.
 - a) When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced or if construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other

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foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Rodding and trenching applications should be made at a rate of 4 gallons of emulsion per 10 linear feet per foot of depth from grade to top of footing. However, in no case should a structure be treated below the footer. Rod holes should be spaced to provide a continuous barrier.

- b) Trenches need not be wider than 6 inches. Treat soil with the dilution as it is being replaced in the trench.
 - c) Hollow block foundations or voids of masonry can be treated to make a complete chemical barrier, especially if soil was not treated prior to pouring the footing. Apply the dilution at a rate of 2 gallons per 10 linear feet so that it reaches the top of the footing.
 - d) For crawl spaces, establish a vertical barrier on both sides of the foundation and around all piers and areas where underground utilities exit the soil. Do not apply the dilution to the entire surface area intended as the crawl.
3. For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure: Apply the dilution at the rate of 4 gallons per 10 linear feet per foot of depth. Soil adjacent to both sides of foundation walls, supporting piers, plumbing and conduits should be treated by trenching or rodding (where soil conditions permit) to a depth of 6 inches or, if less shallow, to the top of the footing. When conditions will not permit trenching or rodding, surface application adjacent to interior foundation walls may be made but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application should be made at a rate of 1 gallon per 10 square feet as a very coarse spray under low pressure (not to exceed 20 psi when measured at the treating tool). After soil treatment, a continuous vapor barrier of at least 6 mil polyethylene film or other suitable vapor barrier must be installed on the ground surface over the entire subfloor area and on the inside of the plenum walls, in accordance with the recommended practices for plenum-type structures.

POST-CONSTRUCTION TREATMENTS

Post-construction applications are defined as those applications made after the final grade is installed. All post-construction treatments must be for spot and local treatment ONLY.

See "RATE DETERMINATION GUIDELINES" and "TABLE 1" for dilution directions.

Precaution: Do not apply dilution until location of heat or air conditioning ducts, vents, water and sewer lines and electrical conduits are known and identified. Extreme caution must be taken to avoid contamination of these structural elements and airways. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs should be of a non-cellulose material or covered by an impervious non-cellulose material.

- 1. For slab-on-ground construction, applications may be made using techniques such as subslab injection, rodding and/or trenching. Injectors should not extend beyond the tops of the footings.
 - a) Treat along the outside of the foundation to form a continuous termiticide barrier in the soil.

For shallow foundations, 1 foot or less, dig a narrow trench approximately 6 inches wide along the outside of the foundation walls. Do not dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. The dilution should be applied to the trench and mixed with the soil as it is replaced in the trench.

For foundations with footings deeper than 1 foot, apply the dilution at a rate of 4 gallons per 10 linear feet per foot of depth. For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements at the rate prescribed from grade to the top of the footing. When the footing is more than 4 feet below grade, the applicator must trench and rod into the trench or trench along the foundation wall at the rate prescribed to a minimum of 4 feet. The actual depth of treatment will vary depending on soil type, degree of compaction and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.
 - b) When treating cracks and expansion joints in the slab, along sidewalks or patios adjacent to the exterior foundation wall or other areas where holes are to be drilled to form a continuous termiticide barrier, the holes should be spaced at intervals up to 24 inches depending on soil type.

Hard, dry soils typically allow good lateral (horizontal) dispersion. However, they may be slow in absorption or downward movement. Care must be taken when injecting through slabs into areas with this type of soil. Low pressures should be considered in this situation. This will help to avoid backspashing from the injection hole, backflow from the cracks and expansion joints and unwanted emergence of the termiticide dilution from adjacent drill holes. A slow, low-pressure application using the proper volume of termiticide dilution will allow the soil to absorb the liquid and provide an adequate vertical barrier. The wider drill hole spacings (18 to 24 inches) can usually be used in this situation. Sand, Loam or Gravel backfill materials are commonly found under slab foundations. The type of fill, amount of settling that has occurred, moisture content, etc., will determine drill hole spacing and amount of termiticide dilution to be injected through each hole. Highly absorptive soils or those with large pore spaces (Gravel, Coarse sand) will afford rapid downward (vertical) movement and limited lateral (horizontal) distribution of the termiticide dilution. In this situation, consider using a lateral dispersion tip on the subslab injector and place the drill holes closer together (12 to 18 inches). For a 0.5% rate, apply 4 gallons of dilution per 10 linear feet.

- c) It may be necessary to treat along one side of interior partition walls if there are cracks in the slab, plumbing entry points, existing Termite infestations or other conditions which would make treatment appropriate.
 - d) To complete the termiticide barrier under slab foundations, it may be necessary to drill and treat near plumbing and electrical entry areas, cracks or other areas where Termites might enter the structure. In this instance, one or more holes should be drilled in the slab as close to the entry point as is practical and termiticide placed in the fill. As a general rule, 3 to 5 gallons of dilution per entry point will usually give adequate coverage; however, the use of directional or lateral dispersion tips or foam delivery systems can give adequate coverage, however, the use of directional or lateral dispersion tips or foam delivery systems can give adequate coverage with lower volumes. Location of the drill hole in relation to the entry point, type of soil fill, presence or absence of a vapor barrier, application pressure and other considerations will affect the coverage and volume of termiticide needed to form a complete barrier. Precautions must be taken to avoid drilling into plumbing or electrical conduit.
 - e) When necessary, drill through the foundation walls from the outside and force dilution just beneath the slab either along the inside of the foundation or along all the cracks and expansion joints and other critical areas.
 - f) **Bath traps:** Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas may be treated with 0.5% dilution of this product. An access door or inspection vent should be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil. A one square foot bath trap will usually require about 3 to 5 gallons of dilution for thorough and complete coverage.
2. Hollow block foundations or voids in masonry resting on the footing can be treated to make a continuous chemical barrier in the voids. If the void has direct contact with the soil, it should be treated. Drill and treat all voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of 0.5% dilution per 10 linear feet of footing using a nozzle pressure of less than 25 psi. When using this treatment, access holes must be drilled below the soil plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.
- Not for use in voids insulated with rigid foam.
- 3. For basements, apply at a rate of 4 gallons of dilution per 10 linear feet per foot of depth. Where footings are greater than 1 foot of depth from the grade to the top of the footing, application may be made by trenching and/or rodding at a rate of 4 gallons of dilution per 10 linear feet per foot of depth. When the footing is more than 4 feet below grade, the applicator must trench and rod into the trench or trench along the foundation wall at the rate prescribed to a minimum depth of 4 feet. The actual depth of treatment will vary depending on soil type, degree of compaction and location of Termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Treat outside of foundation walls, and if necessary, beneath the basement floors, along inside of foundation walls, along cracks in basement floors, along interior load-bearing walls, around sewer pipes, conduits and piers.

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4. **Accessible Crawl Spaces:** For crawl spaces, apply vertical termiticide barriers at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth from grade to top of footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. For a 0.5% rate, apply 4 gallons of dilution per 10 linear feet per foot of depth or 5 1/2 fluid ounces of this product per 10 linear feet per foot of depth from grade to top of footing in sufficient water (not less than 2 gallons or more than 8 gallons) to ensure complete coverage. Apply by trenching and rodding into the trench or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions, such as concrete walkways adjacent to foundation elements, prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use directions section of this label if situations are encountered where the soil will not accept the full application volume.
 - a) Rod holes and trenches shall not extend below the bottom of the footing.
 - b) Rod holes shall be spaced so as to achieve a continuous chemical barrier, but in no case more than 12 inches apart.
 - c) Trenches shall be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench shall be stepped to ensure adequate distribution and to prevent termiticide from running off. The emulsion must be mixed with the soil as it is replaced in the trench.
 - d) When treating crawl spaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.
5. **Inaccessible Crawl Spaces:** For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate if possible, and treat according to the instructions for accessible crawl spaces.
 - a) To establish a horizontal barrier, apply 1 gallon of 0.5% dilution per 10 square feet to the soil surface. Use a nozzle pressure of less than 25 psi and a coarse application nozzle (e.g. Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or powerspray with higher pressures.
 - b) To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of 0.5% dilution per 10 square feet. Drill spacing must be at intervals not to exceed 18 inches. Many states have smaller intervals, so check state regulations that may apply.
 - c) When treating crawl spaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.
6. **In plenum-type structures,** which use a sealed underfloor space to circulate heated and/or cooled air within the structure, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil. Apply 0.5% dilution at the rate of 4 gallons per 10 linear feet per foot of depth. Soil adjacent to both sides of foundation walls, supporting piers, plumbing and conduits should be treated by trenching or rodding (where soil conditions permit) to a depth of 8 inches or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation piers or pipes. The surface application should be made at a rate of 1 gallon per 10 square feet as a very coarse spray under low pressure (not to exceed 20 psi when measured at the treating tool). In order to properly calculate the amount of termiticide dilution needed, use the following guideline; a strip 18 inches wide and 6 feet 8 inches long is equal to 10 square feet. Before treatment, a barrier of at least 6 mil polyethylene film or other suitable vapor barrier must be present on this ground surface over the entire subfloor area in accordance with recommended practices for plenum-type structures. Install a new vapor barrier if barrier is absent or deteriorated. The vapor barrier film on the ground and foundation walls must be folded back from the areas to be treated prior to treatment and replaced immediately following treatment. Structures should be ventilated during application and until treatment is dry.
7. **Application using foam-generating equipment:** The emulsion may be converted to a foam and the foam used to control or prevent Termite infestations. Depending on circumstances, foam applications may be used alone or in combination with liquid emulsion applications. Applications may be made behind veneers, piers, chimney bases, into rubble

foundations, into block voids or structural voids, under slabs, stoops, porches or to the soil in crawl spaces and other similar voids. Foam and liquid application must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 50 to 75% of the labeled liquid emulsion volume of product must be applied, with the remaining percent delivered to appropriate areas using foam application. Refer to the label and use recommendations of the foam manufacturer and the foaming equipment manufacturer for adjuvant rates to produce the needed expansion ratio with this product.

Foam applications are generally a good supplement to liquid treatments in difficult areas, but may be used alone in difficult spots. For a 0.5% rate, apply 5 1/2 fluid ounces of this product per 10 linear feet (using no less than 2 gallons or more than 8 gallons) of pre-foamed dilution.

8. **Application in conjunction with the use of the Sentricon® Colony Elimination System:** As a part of the integrated pest management (IPM) program for subterranean Termite control, this product may be applied to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks and areas with known or suspected infestations as a spot application. Application may be made as described in the "POST-CONSTRUCTION TREATMENT" section of this label.

UTILITY POLES AND FENCE POSTS

Preventative Treatment: Use a 0.5% dilution (see "RATE DETERMINATION GUIDELINES" and "TABLE 1" for dilution directions). After pole or post hole has been dug, mix the dilution with the soil as it is being replaced to a depth of approximately 10 inches. Place pole or post on top of this layer. The remaining soil fill and termiticide dilution should be mixed while backfilling the hole. The treated soil zone around the post or pole should be approximately 6 inches wide. Soil for the base layer and backfill of each pole or post should be treated at a rate of 4 gallons of dilution per 10 cubic feet of soil.

Remedial Treatment: To control existing infestations or to prevent infestation of posts and poles already in place, use a 0.5% dilution. The termiticide dilution should be injected into Termite galleries or channels in the wood. For maximum protection, injection sites should be at or below grade.

Posts or poles may also be treated by rodding down to the base of the structure. Rod holes should be placed approximately 3 inches away from the pole and about 6 inches apart. Inject approximately 12 fluid ounces of dilution per foot of depth into each rod hole. It may be appropriate to use one or both treatment techniques depending upon the specific circumstances at the work site (e.g., soil type).

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container in secured, dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Avoid storing above 122°F for extended periods of time. Storage below 40°F may result in formation of crystals. If product crystallizes, store at 55°F to 75°F and shake occasionally to redissolve crystals. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA regional office for guidance.

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. statements or representations.



Drexel Chemical Company

ck 7/7

October 2, 2001

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Ariel Rios Bldg
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

NOTIFICATION
DEC 2 0 2001

**Re: Notification Submission of a Revised Label per PR Notice 98-10
DREXEL CHLORPYRIFOS TERMITICIDE Concentrate (EPA Reg. No. 19713-518)**

In support of the above, please find:

1. Completed EPA Form 8570-1
2. One (1) copy of the label (518SP-1001) with the following revision:

In the Storage and Disposal box on page 4 of the label, the statements "Storage below 23°F.....to redissolve crystals." were deleted as there are already statements appearing prior to these statements under the same "Pesticide Storage" heading (i.e. "Storage below 40°F may result.....shake occasionally to redissolve crystals.")

3. Certification letter required by 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 lpiwonka@drexchem.com.

Thank you.

Respectfully,
DREXEL CHEMICAL COMPANY

Luz G. Piwonka
Luz G Piwonka
Registration Manager

