

19713-518

2/24/2010

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



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

February 24, 2010

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

Subject: Label Notification per Pesticide Registration Notices 98-10 and 2007-4

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notices (PRNs) 98-10 and 2007-4, dated February 4, 2010, for Drexel Chlorpyrifos Concentrate, EPA Reg. No. 19713-518.

The Registration Division (RD) has conducted a review of this request for applicability under PR Notices 2007-4 and 98-10, and finds that the label changes requested fall within the scope of PR Notices 2007-4 and 98-10. The label has been date-stamped "Notification" and will be placed in our records. Please note that the new primary brand name has been added to the record. All previously accepted brand names are now invalid.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself, and can be added by non-notification per PR Notice 98-10.

If you have any questions, please contact me directly at 703-308-8735 or email me at chao.julie@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Julie A. Chao".

Julie A. Chao
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-518	2. EPA Product Manager John Hebert	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL CHLORPYRIFOS CONCENTRATE	PM# 07 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

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

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

Notification - Explain below. Other - Explain below.

NOTIFICATION

FEB 24 2010

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

Submission of revised label to change brand name per PR Notice 98-10 and per PR Notice 2007-4. Details are in the cover letter accompanying this submission.

Thank you.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
1, 2.5, 5, 10, 15, 30, 55 GAL; Bulk; Tote

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued
 Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (include Area Code) (901) 774-4370
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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.

2. Signature <i>Luza Chan</i> 2010.02.04 14:31:43 -06'00'	3. Title REGISTRATION MANAGER	6. Date Application Received (Stamped)
4. Typed Name LUZ G CHAN	5. Date February 4, 2010	



Drexel Chemical Company

February 4, 2010

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

**Re: Submission of Revised Label by Notification
DREXEL CHLORPYRIFOS CONCENTRATE (EPA Reg. No. 19713-518)**

Herewith:

1. Completed EPA Form 8570-1
2. Two copies of the label (518SP-0210*) with the following revisions:
 - i) Per EPA's request, we are changing the brand name of this product from Drexel Chlorpyrifos TC to Drexel Chlorpyrifos Concentrate.
 - ii) Shake Well Before Using was deleted as it is not necessary. This product is in an EC form.
 - iii) The container disposal statements were revised per PR Notice 2007-4.

I highlighted the changes for easy reference.

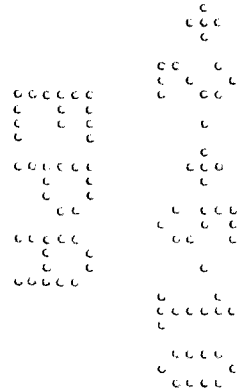
3. Certification statements

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY

Luz G. Chan
Luz G Chan
Registration Manager



Drexel

Drexel Chemical Company

February 4, 2010

Submission of Revised Label by Notification

DREXEL CHLORPYRIFOS 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

Luiz G. Chan

LUZ G CHAN

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

FEB 24 2010

CHLORPYRIFOS CONCENTRATE

FOR USE IN TREATMENT OF WOOD PRODUCTS IN NON-RESIDENTIAL AND INDUSTRIAL PLANT SITES ONLY.

ACTIVE INGREDIENT:

Chlorpyrifos..... 44.9%

OTHER INGREDIENTS*: 55.1%

TOTAL: 100.0%

This product contains 4 pounds of Chlorpyrifos per gallon.

*Contains aromatic petroleum distillates.

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.)

See FIRST AID Below

EPA Reg. No. 19713-518

EPA Est. No. 19713- XX-XXX

Net Contents: _____

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Do not give any liquid to the person. • 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 IN EYES:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes.
IF INHALED:	<ul style="list-style-type: none"> • 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.
<p>Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.</p>	
<p>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. May pose an aspiration pneumonia hazard. Contains petroleum distillate.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: May be fatal if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Do not get in eyes, or on skin. 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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All mixers, loaders, applicators and handlers must wear: Coveralls over long-sleeved shirt and long pants, chemical-resistant footwear plus socks, chemical-resistant gloves made of barrier laminate or viton, chemical-resistant apron when mixing or loading or exposed to the concentrate, chemical-resistant headgear for overhead exposures, and a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any R, P, or HE filter.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, small mammals and birds. 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 may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash water or rinsate.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

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.

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.



Manufactured By:

Drexel Chemical Company

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

SINCE 1972

GENERAL USE PRECAUTIONS AND RESTRICTIONS

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

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. After application, the applicator is required to check for leaks.

All leaks resulting in the deposition of this product in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. 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.
5. Consult Federal, State and Local specifications for information regarding approved treatment practices in your area.

Treatment of Wood Products (Right-of-Ways, Manufacturing, or Industrial Sites Only)

To prevent insect attack of wood product, this product may be used for treatment of fence posts, utility poles, railroad ties, landscape timbers, logs, pallets, wooden containers, poles, posts, and processed wood products.

Dosage and Mixing Directions

This product is recommended for use as an aqueous emulsion containing 0.5% to 1.0% Chlorpyrifos. See following table for dilution directions.

Gals. of finished dilution desired	This Product		
	0.5% Solution	1.0% Solution	2.0% Solution
1	1.33 fl. ozs.	2.66 fl. ozs.	5.33 fl. ozs.
5	6.66 fl. ozs.	13.33 fl. ozs.	26.66 fl. ozs.
10	13.33 fl. ozs.	26.66 fl. ozs.	53.33 fl. ozs.
24	1 qt.	0.5 gal.	1 gal.
48	0.5 gal.	1 gal.	2 gals.
97	1 gal.	2 gals.	4 gals.

Advisements

To control wood infesting insects such as Ambrosia beetles (Scolytidae), Death-watch beetles (Anobiidae), False powderpost beetles (Bostrichidae), Old house borers (Cerambycidae) and Powderpost beetles (Lyctidae), treatments may be applied either as coarse sprays or by brushing the product onto targeted surfaces. Use sufficient amount of spray to cover the area to the point of wetness but avoiding runoff. Use the following guidelines to determine appropriate rates of application:

Type of Wood	Diluted Spray	Area to be Sprayed (as a coarse spray)
New Wood (typically less than 10 years of age)	1 gallon	150 sq. ft.
Old Wood (typically greater than 10 years of age)	1 gallon	100 sq. ft.

WARRANTY—CONDITIONS OF SALE

OUR DIRECTIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically directed and other influencing factors in the use of this product are beyond the control of the Seller. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable law, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

PEST CONTROL ON OUTDOOR SURFACES AND AROUND BUILDINGS (Industrial Plant Sites Only)

To control Ants, Bees, Carpenter ants, Clover mites, Cockroaches, Crickets, Earwigs, Hornets, Millipedes, Scorpions, Spiders, Ticks, Wasps and Yellow-jackets.

Outside Surfaces: Apply this product as a residual spray to outside surfaces of buildings including window frames, eaves, garages, refuse dumps and other areas where pests congregate or have been observed. Treatment may be repeated as needed to maintain effectiveness.

Perimeter Sprays: To help prevent infestation of buildings, treat a band of soil and vegetation 6 to 10 feet wide around and adjacent to the building. Also, treat the building foundation to a height of 2 to 3 feet where pests are active and may find entrance. For Scorpions, treat or remove accumulations of lumber, firewood, and other materials which serve as insect harborage sites.

Dosage and Mixing Instructions: Use this product as a 0.25% to 0.5% dilution as indicated in the following table:

Gals. of finished dilution desired	This Product	
	0.25% Solution	0.5% Solution
1	0.66 fl. ozs.	1.33 fl. ozs.
5	3.33 fl. ozs.	6.66 fl. ozs.
10	6.66 fl. ozs.	13.33 fl. ozs.
24	16 fl. ozs.	1 qt.
48	1 qt.	2 qts.
97	2 qts.	1 gal.

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:

Nonrefillable Container (rigid material; less than 5 gallons): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid material; 5 gallons or greater): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Containers: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.