

19713-518

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

June 21, 2012

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

Subject Amended labeling to clarify directions for use for wood products
Drexel Chlorpyrifos Concentrate
EPA Reg No 19713-518
EPA Decision No 464955

Dear Ms Chan

The proposed labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable. Please submit one copy of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Julie by phone at (703) 308-8735, or by email at chao.julie@epa.gov

Regards,

Venus Eagle, Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

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

ACCEPTED
JUN 21 2012

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under

EPA Reg No 19713-518



Drexel

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 Content _____

FIRST AID	
IF SWALLOWED	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	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 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 1 800 858 7378	
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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

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 over head 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

The Drexel logo is a registered trademark of Drexel Chemical Company



Manufactured By
Drexel Chemical Company

P O BOX 13327 MEMPHIS TN 38113 0327

SINCE 1972

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

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 wooden containers poles and posts

Dosage and Mixing Directions

Use this product 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) Deathwatch 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 avoid

ing 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

PEST CONTROL ON OUTSIDE 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 Yellowjackets

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	1.6 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 up to < 250 gallons)

Nonrefillable container Do not reuse or refill this container Offer for recycling if available Clean container promptly after emptying Triple rinse as follows Empty the remaining contents into ap

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STORAGE AND DISPOSAL (Cont)

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 Container (≥ 250 gallons & Bulk) Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously 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.

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 recommended, and other influencing factors in the use of this product are beyond the control of the Seller. To the extent allowed by applicable laws, buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent allowed by applicable laws, 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.