

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

JUL 1 8 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Subject:

Supplemental Label: Revised PHI, restrictions and application rates for corn (Field

Corn and Sweet Corn, including Corn Grown for Seed)

EPA Reg. No. 19713-520

Chlorpyrifos 4E-AG Insecticide

Dear Ms. Chan:

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

- 1) You must make the new approved supplemental label available to all distributors and users immediately. The Agency recommends that the registrant send distributors, dealers and other key end-users e-mail/letters/FAX forwarding the revised labeling and explanations for quick implementation.
- 2) Please incorporate the supplemental label changes and all the other chlorpyrifos mitigation language required by the IRED into the section 3 label. Please submit the revised section 3 label for re-registration within a month from the date of this letter by e mail and/or paper copies.

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

Sincerely yours,

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

RESTRICTED USE PESTIC

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.

SUPPLEMENTAL LABELING



Chlorpyrifos 4E-AG

(EPA Reg. No. 19713-520)

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

ACCERTAD HE ENTIRE DREXEL CHLORPYRIFOS 4E-AG LABEL BEFORE PROCEEDING with COMMENTS THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABEL In EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN

Under the Federal Insecticide, Punzicido and Rodenticide Act, nended, for the pesticide

WARNING

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This labeling and the EPA registered labeling must be in the possession of the user at time of pesticide application.

All applicable directions, restrictions and use precautions on DREXEL CHLORPYRIFOS 4E-AG label(s) are to be followed. This labeling contains supplemental instructions and restrictions for use of this product which may not appear on the DREXEL CHLORPYRIFOS 4E-AG label. Follow the instructions carefully.

FIELD CORN, SWEET CORN, CORN GROWN FOR SEED

For use to control Aphids, Armyworms, Billbugs, Chinch bugs, Common stalk borers, Corn borers, Corn earworms, Corn rootworm adults and larvae, Cutworms, Flea beetle larvae and adults, Grasshoppers, Grubs, Lesser cornstalk borers, Seedcorn beetles and maggots, Symphylans, Western bean cutworms, and Wireworms.

Pre-plant Incorporation Treatment

Use this product at the following rates by application in sufficient water to the soil surface and incorporate into the soil:

L	Pest	This Product/A
L	Cutworms, Symphylans	2 pts.
	Billbugs, Flea beetle larvae, Grubs, Seed- corn beetles, Seedcorn maggots, Wireworms	2 pts.
[Corn rootworm larvae, Lesser cornstalk borers	2 pts.

Use recommended rate in not less than 10 gallons of water per acre and apply as a broadcast spray to the soil surface using suitable power-operated ground spray equipment. On the same day of treatment, incorporate the insecticide into the top 2 to 4 inches of soil using a disc, field cultivator or equivalent

This product may also be applied in tank mixtures with liquid fertilizer solutions and/or with Eradicane®, Sutan®, Lasso®, Dual® and atrazine herbicides. See "MIXING DIRECTIONS" section for further information. Read and carefully follow all applicable directions, restrictions and precautions on labeling for the other products used in combination with this product.

Pre-plant, At-plant or Pre-emergence Treatment in Conservation Tillage Use this product at the following rates by application in sufficient water to surface trash and exposed soil:

	Pest	This Product/A
Ī	Armyworms, Cutworms	1 to 2 pts.

Use recommended rate in not less than 20 gallons of water per acre and apply as a broadcast spray using suitable power-operated ground spray equipment. Use higher rates for residual control.

This product may also be applied in tank mixtures with liquid fertilizer solutions and/or with paraguat and Roundup?. See "MIXING DIRECTIONS" section for further information. Read and carefully follow all applicable directions, restrictions and precautions on labeling for the other products used in combination with this product.

Cultivation Time Treatment

Use this product at the rate of 2 pints per acre to control Corn rootworm larvae. Apply this product as a water emulsion on both sides of the row at the base of the plants just ahead of the cultivator shovels. Cover the insecticide with soil around the brace roots. The best time to apply a basal treatment of a soil insecticide with cultivation is near the beginning of egg hatch. A cultivation application of this product may be made in addition to an at-planting application of Chlorpyrifos 15G granular insecticide.



Post-emergence Treatment

Use this product at the following rate by application in sufficient water to ensure thorough coverage of treated plants:

Pest	This Product/A
Armyworms, Aphids, Chinch bugs, Corn rootworm adults, Cutworms, European Corn borers (see ""NOTE""), Flea beetle adults, Southern corn beetle, Webworms, Western bean cutworms	1 to 2 pts.
Billbugs, Common stalk borers, Corn root- worm larvae, Lesser cornstalk borers	2 pts.
Corn earworms, Southwestern Corn bor- ers	1.5 to 2 pts.
Grasshoppers	0.5 to 1 pt.

For aerial application, use 2 to 5 gallons of spray per acre. Control may be reduced at low spray volumes under high temperature and wind conditions. This product may be tank mixed with products containing glyphosate when application is to be made to glyphosate-tolerant Corn. **NOTE:** DO NOT apply this product by air in Mississippi.

Note: The recommended dosage will control silk clipping by Corn rootworm adults. For European Corn borer control, use 1.5 to 2 pints per acre when application is made with power-operated ground or aerial equipment and 1 to 2 pints per acre when application is made through a sprinkler irrigation system. See following text for generation-specific treatment. Treat when field counts indicate that pests are or may become a problem.

For best Billbug, Chinch bug and Flea beetle control, apply with sufficient water to ensure a minimum spray volume of 20 to 40 gallons per acre and 40 psi using ground spray equipment. On Corn less than 6 inches tall, apply the insecticide spray in a 9- to 12-inch wide band over the row. On Corn greater than 6 inches tall, apply the insecticide spray using drop nozzles directed to the base of the plant. Do not reduce the dosage for banded or directed applications. Concentrate the full-labeled dosage rate in the treated zone. When Chinch bugs continue to immigrate to Corn over a prolonged period or under extreme pressure, a second application of this product may be needed.

For control of Corn rootworm larvae, apply at cultivation. Direct the spray to both sides of the row at the base of the plants just ahead to the cultivator shovels. Cover the insecticide with soil around the brace roots. A cultivation application of this product may be made in addition to an at-planting application of Chlorpyrifos 15G insecticide.

For Aphids, Armyworms, Corn rootworm adults, Corn earworms and Common stalk borer control, Cutworms, European Corn borers, Grasshoppers, Lesser cornstalk borers, Southwestern Corn borers, Webworms, and Western bean cutworms, apply as a broadcast spray using either aerial (fixed-wing or helicopter) or power-operated ground spray equipment.

For Cutworms, it is preferable to apply this product when soil is moist and Worms are active on or near the soil surface. If ground is dry, cloddy or crusty at the time of treatment, Worms may be protected from the spray and effectiveness will be reduced. If such conditions exist, shallow incorporation using a rotary hoe or other suitable equipment immediately before or soon after treatment may improve control. A second application may be required if damage or density levels exceed the economic threshold for your area. Consult your agricultural experiment station or extension service specialist for additional information concerning control practices in your area.

For Webworm control, shallow incorporation using a rotary hoe or other suitable equipment, immediately before or soon after treatment, is necessary. For first-generation European Corn borer control, treat when 25 to 50 percent of the Corn plants show pinhole feeding or leaf-feeding scars. For maximum control potential, ground applications of this product should be directed into the Corn leaf whorls. Scout fields within 5 days after application to determine if a second application is needed. University research indicates that achieving greater than 50% control of first-generation European borers with a single liquid insecticide treatment is highly dependent on timing, insecticide placement and weather conditions.

Treatment for control of second-generation European Corn borers should be applied when field counts of egg masses indicate an infestation is present or about to develop.

For Southwestern Corn borer control, treat when field counts of egg masses indicate pests are or may become a problem. A second application may be applied 10 to 14 days later, if needed, due to reinfestation.

For Common stalk borer control, treat approximately 11 days after application of Roundup herbicide or after complete burn down with paraquat herbicide (3 to 5 days). Do not use this product in combination with the burn down herbicide for control of Common stalk borers.

This product may also be applied through sprinkler irrigation systems as a post-emergence broadcast application to control the above listed foliar Insects. For best results, use the recommended rate of this product in a tank mix with 2 pints per acre of non-emulsifiable oil. Maintain vigorous tank agitation to assure uniformity of this product plus oil mixture throughout the injection period. This product may also be applied through sprinkler irrigation systems

at the rate of 2 pints per acre to control Corn rootworm larvae. Time application to coincide with the appearance of the second instar larvae. Maintain vigorous tank agitation to assure uniformity of the application throughout the injection period. Apply with enough water to wet the root zone to the depth control that is needed. Under saturated soil conditions, allow enough soil drying to occur so that an application using a minimum water rate will not produce runoff. Consult university extension personnel or other experienced consultants to determine the need to treat and to aid in application timing. See "SPRINKLER IRRIGATION" section for further information.

RESTRICTIONS

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours unless PPE required for early entry is worn.

Do not apply within 21 days before harvest of grain or ears.

Do not apply more than 6 pints of this product (3 lbs. chlorpyrifos a.i.) per acre per season.

Do not make more than three applications of any product containing chlorpyrifos per season, including the maximum allowed of two granular applications, at the 1 lb. chlorpyrifos a.i. rate.

Do not make a second application of this product or other products containing chlorpyrios within 10 days of the first application.

Maximum single application rate is 2 pints of this product (1 lb. chlorpyrifos a.i.) per acre.

Do not apply in tank mixes with Steadfast™ or Lightning® herbicides.

If more than 1 lb. a.i. granular chlorpyrifos per acre is applied at-plant (for a maximum of 1.3 lbs. a.i. per acre per season), only one additional application of a liquid containing chlorpyrifos at 1 lb. a.i. per acre is allowed per season, for a total of 2.3 lbs. chlorpyrifos a.i. per acre per season.