



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 29, 2024

Kresti Lyddon
Lewis & Harrison, LLC
Agent for Drexel Chemical Company
2461 S. Clark St.
Ste 710
Arlington, VA 22202

Subject: Label Amendment – Label changes based on the 2022 National Marine Fisheries Service Biological Opinion on Chlorpyrifos
Product Name: Drexel Chlorpyrifos 15GR
EPA Registration Number: 19713-521
Application Date: February 29, 2024
Decision Number: 595146

Dear Kresti Lyddon:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Chlorpyrifos 2022 Biological Opinion. The Agency has concluded that your submission is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved by the Agency. In accordance with 40 CFR § 152.130(c), Drexel Chemical Company (Drexel) may distribute or sell this product under the previously approved labeling until April 30, 2025. After April 30, 2025, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To

distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to the company’s website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance Assurance.

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.

If you have any questions, please contact Patricia Biggio at 202-566-1938 or at biggio.patricia@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dana L. Friedman". The signature is fluid and cursive, with the first name "Dana" being more prominent.

Dana Friedman
Branch Chief
Risk Management and Implementation Branch I
Pesticide Re-evaluation Division

Enclosure

CC: Michael Walsh, Registration Division, PM11

ACCEPTED

Sep 29, 2024

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 19713-521

CHLORPYRIFOS GROUP 1B INSECTICIDE

Drexel®

Chlorpyrifos 15GR

Agricultural Insecticide

For control of various insects infesting certain field and vegetable crops.

ACTIVE INGREDIENT:

Chlorpyrifos..... 15.0%

OTHER INGREDIENTS: 85.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-521

EPA Est. No. 19713-XX-X

Net Contents:

50 Lbs.

FIRST AID ORGANOPHOSPHATE

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 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.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate significance 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 antidote immediately after establishing an open airway and respiration.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing dust.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Loaders, applicators and all other handlers must wear: Coveralls over long-sleeved shirt and long pants, chemical-resistant gloves made of barrier laminate or Viton ≥14 mils, chemical-resistant footwear plus socks and a NIOSH approved particulate respirator with any N, R or P filter with NIOSH approval number prefix TC-84A; or a NIOSH approved powered air purifying respirator with HE filter with NIOSH approval number prefix TC-21C.

See "ENGINEERING CONTROLS" for additional requirements.

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.

Manufactured By:

Drexel Chemical Company

P.O. Box 13327, Memphis, TN 38113-0327

SINCE 1972

The DREXEL logo is a registered trademark of Drexel Chemical Company.

ENGINEERING CONTROLS

Pilots must use an enclosed cockpit in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

When applicators use closed cab motorized ground equipment in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(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/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 cleaning equipment or disposing of equipment washwater 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.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read all "Directions For Use" before applying.

AGRICULTURAL USE REQUIREMENTS

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.

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 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), restricted entry interval (REI), and notification of workers. The requirements in this box only apply to uses of this product that are covered by the WPS.

Exception: If this product is injected or incorporated into the soil, the WPS allows workers to enter the treated area if there will be no contact with anything that has been treated under certain circumstances.

Certified crop advisors or persons entering fields under their direct supervision under certain circumstances may be exempt from the early re-entry requirement pursuant to 40 CFR Part 170.

Do not enter or allow entry into treated areas during the REI. The REI for each crop is listed in the directions for use associated with each crop. 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 over short-sleeved shirt and short pants, chemical-resistant footwear plus socks, chemical-resistant gloves made of barrier laminate or Viton ≥ 14 mils, and chemical-resistant headgear for overhead exposure.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

INSECTICIDE RESISTANCE MANAGEMENT (IRM)

CHLORPYRIFOS 15GR contains a Group 1B insecticide. Insect and mite biotypes with acquired resistance to Group 1B may eventually dominate the insect/mite population if Group 1B insecticides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by this product or other Group 1B insecticides. The following practices are recommended to delay development of insecticide resistance:

- Avoid consecutive use of insecticides with the same mode of action (same insecticide group) on the same insect species.
- Use tank mixtures or premix product containing insecticides with different modes of action (different insecticide groups), provided the products are registered for use.
- Base insecticide use on comprehensive Integrated Pest Management (IPM) programs.
- Monitor treated insect populations in the field for loss of effectiveness.
- Contact your Local Agricultural Extension Specialist, certified crop advisor, or Manufacturer for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems..

RESTRICTIONS:

Use as a wide area/general outdoor treatment for ants and other miscellaneous pests (excludes wide-area mosquito adulticide use) is prohibited.

1. Do not apply within 25 feet of aquatic habitats (such as, but not limited to, lakes, reservoirs, rivers, permanent streams, wetlands or natural ponds, estuaries, and commercial fish farm ponds).
2. Do not apply directly to, or allow the product to enter sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.
3. Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
4. Do not apply to vertical surfaces directly above pervious or impervious surfaces that drain into ditches, storm drains, gutters, or surface waters.
5. Do not apply or irrigate to the point of runoff.

Endangered Species Protection Requirements:

It is a Federal offense to use any pesticide in a manner that results in an unauthorized "take" (e.g., kill or otherwise harm) of an endangered species and certain threatened species under the Endangered Species Act section 9. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the area in which you are applying the product. You must obtain a Bulletin no earlier than six months before using this product. To obtain Bulletins, consult <http://www.epa.gov/espp/>, call 1-844-447-3813, or email ESPP@epa.gov. You must use the Bulletin valid for the month in which you will apply the product.

Reporting Ecological Incidents: To report ecological incidents, including mortality, injury, or harm to plants and animals, call 901-774-4370.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather-related factors determine the potential for spray drift. The applicator is responsible for considering all of these factors when making decisions to apply this product.

The following buffer distances specified in the below table are distances in feet that must exist to separate sensitive sites from the targeted application site. Buffers are measured from the edge of the sensitive site to the edge of the application site. Sensitive sites are areas frequented by non-occupational bystanders (especially children). These include residential lawns, pedestrian sidewalks, outdoor recreational areas such as school grounds, athletic fields, parks and all property associated with buildings occupied by humans for residential or commercial purposes. Sensitive sites include homes, farm worker housing, or other residential buildings, schools, daycare centers, nursing homes and hospitals. Non-residential agricultural buildings, including barns, livestock facilities, sheds and outhouses are not included in this prohibition.

Only pesticide handlers are permitted in the setback area during application of this product. Do not apply this product if anyone other than a mixer, loader, or applicator is in the setback area. **Exception:** Vehicles and persons riding bicycles that are passing through the setback area on public or private roadways are permitted.

[**Note:** The required buffer zones below **do not** apply when this product is applied via furrow, T-banded, or post-emergent banded application methods.]

Application Rate (lb. a.i./Ac.) [Lbs. of this Product per Acre]	Required Setback (Buffer Zones) (ft.)	
	Aerial	Ground*
> 0.5 to 1 [> 3.33 to 6.66]	25	10
> 1 to 2 [> 6.66 to 13.33]	Not allowed	10
> 2 to 3 [> 13.33 to 20]	Not allowed	10
> 3 to 4 [> 20 to 26.66]	Not allowed	10
> 4 [> 26.66]	Not allowed	10

* The required buffer zones for ground application apply to applications made via spreaders.

RATES OF APPLICATION

Do not apply this product by aircraft at a rate greater than 1 pound Chlorpyrifos a.i. (6.6 lb. of this product) per acre.

Rates of Application per 1,000 Feet of Row and Equivalent Acreage at Different Row Spacings								
This Product per 1,000 Feet of Row (Oz.)	Required Amount of This Product per Acre from Various Row Spacing							
	40"	38"	36"	34"	32"	30"	22"	18"
3.7	3.0	3.2	3.4	3.6	3.8	4.0	5.5	6.7
4	3.3	3.4	3.6	3.8	4.1	4.4	5.9	7.3
4.5	3.7	3.9	4.1	4.3	4.6	4.9	6.7	8.2
6	4.9	5.2	5.4	5.8	6.1	6.5	8.9	10.9
6.5	5.3	5.6	5.9	6.2	6.6	7.1	9.7	11.8
7.5	6.1	6.4	6.8	7.2	7.7	8.2	11.1	13.6
8	6.5	6.9	7.3	7.7	8.2	8.7	11.9	14.5
9	7.4	7.7	8.2	8.6	9.2	9.8	13.4	16.3
12	9.8	10.3	10.9	11.5	12.3	13.1	17.8	21.8
15	12.3	12.9	13.9	14.4	15.3	16.3	22.3	27.2
16	13.1	13.8	14.5	15.4	16.3	17.4	23.8	29.0

CALIBRATION OF EQUIPMENT

Note: The chart below lists recommended initial gauge settings for application of this product with one hopper opening per row. Be sure to check the actual application rate under your operating conditions.

1. Fill hopper.
2. Attach a plastic bag to tube opening.
3. Set planter to the initial settings as shown in table, below.
4. Measure off 1,000 feet of row and drive planter the premeasured distance at desired speed.
5. Each bag should contain 6 to 8 ounces of granules, depending upon desired rate.
6. If the result is over or under the desired rate, adjust settings and repeat the calibration.

Equipment Calibration and Calibration Settings for Different Types of Equipment										
Planter Type	Speed (mph)									
	4		5		6		7		8	
	This Product per 1,000 Feet of Row (Oz.)									
	8	16	8	16	8	16	8	16	8	16
	Gauge Setting									
Gandy ¹	21.4	30.2	23.7	32.4	26.0	36.0	27.7	39.0	30.2	41.0
John Deere ¹ Max-Emerge ²	20	44	26	46	30	49	35	52	40	54
John Deere ¹ 7000 Max-Emerge (Odd Nos. on Gate)	14	22	16	24	18	26	19	28	21	30
John Deere ¹ 7000 Max-Emerge (Even Nos. on Gate)	17	30	20	33	24	35	26	36	28	38
John Deere ² 71 Flexi-Planter and Older Planters	1 30	2 17	2 5	2 22	2 9	2 27	2 13	2 31	2 16	3 16
John Deere ³ Max Emerge Plus	18	—	23	—	29	—	33	—	39	—
Allis Chalmers ⁴ 70 Series	8	13	8	13	8	13	8	13	8	13
Allis Chalmers ⁵ 78 & 79 Series	1									
Noble ¹ (New)	11	19	14	22	16	25	17	28	19	31
White Planter	11	19	14	22	16	25	17	28	19	31
Int'l Harvester ⁵	1 9.0	3 3.0	2 3.3	3 9.5	2 6.0	4 3.0	2 9.0	5 4.0	3 2.5	6 0
Buffalo All-Flex ⁶ (Fleischer Mfg.)	4.88	10	4.88	10	4.88	10	—	—	—	—

- ¹ Gauge setting
² Gauge setting with range 1 & 2 - number is range.
notch
³ An application rate of 16 oz. per 1,000 feet of row is not attainable with this equipment.
⁴ Gauge setting is constant regardless of speed.
⁵ Gauge setting shown with stem gates & dial settings - number shown is gate
dial
⁶ Number of turns open on the adjustment nut.

USE SITES

ALFALFA

For use ONLY in the following state: MO

Worker Restricted Entry Interval: Do not enter or allow worker entry into treated areas during the REI of 24 hours until PPE required for early entry is worn.

Apply this product at planting as an in-furrow treatment for suppression of target pests during establishment. Direct granules into the planter shoe with the seed, then place the applicator tube directly behind the planter shoe so that granules drop into seed furrow. Alternatively, place the granular band applicator behind planter shoe so granules fall on soil surface and into the open seed furrow and are covered with soil.

Pest(s)	Maximum Single Application (lbs. per Acre)	Maximum Annual Application (lbs. per Acre)
Cutworms, Grubs, Wireworms	6.6 lbs/acre (1 lb a.i./acre)	6.6 lbs/acre (1 lb a.i./acre)

USE PRECAUTIONS AND RESTRICTIONS: Do not cut or graze treated Alfalfa within 21 days after application. Maximum single application rate is 1 lb. Chlorpyrifos a.i. (6.6 lbs. of this product) per acre. *Do not make more than 1 application per year of this product or other products containing Chlorpyrifos.*

ASPARAGUS

For use ONLY in the following state: MI

Worker Restricted Entry Interval: Do not enter or allow worker entry into treated areas during the REI of 24 hours until PPE required for early entry is worn.

Apply this product as a post-harvest ground application for suppression of target pests. Apply as a band over the entire crown area when Asparagus beds have been split (i.e. remove most of the soil from above the crowns). Cover area with soil the day of application. **NOTE:** Control may be reduced in soils with high organic matter content.

Pest(s)	Maximum Single Application (lbs. per Acre)	Maximum Annual Application (lbs. per Acre)
Symphytans	6.6 lbs/acre (1 lb a.i./acre)	6.6 lbs/acre (1 lb a.i./acre)

USE PRECAUTIONS AND RESTRICTIONS: Do not apply within 180 days of harvest. Do not apply more than 1 lb. Chlorpyrifos a.i. (6.6 lbs. of this product) per acre per year. Do not make more than one application of this product or other products containing chlorpyrifos per year.

SOYBEANS

For use ONLY in the following states: AL, CO, FL, GA, IA, IL, IN, KS, KY, MN, MO, MT, NC, ND, NE, NM, OH, OK, PA, SC, SD, TN, TX, VA, WI, WV, WY

Worker Restricted Entry Interval: Do not enter or allow worker entry into treated areas during the REI of 24 hours until PPE required for early entry is worn.

Use this product as an at-plant T-band treatment in a 4 to 10 inch band over an open seed furrow in front of press wheel and incorporate in to the top one-half to 1 inch of soil. For post-plant applications, incorporate granules in a 4 to 10 inch band to a depth of one-half to 1 inch using a suitable cultivator. Apply this product with equipment that will provide uniform distribution of granules over the row. Application rates of this product per acre for various row spacings are given in the "Rates of Application per 1,000 Feet of Row and Equivalent Acreage at Different Row Spacings" table.

Pest(s)	Banded Applications (Oz./1,000 ft. of row)	
	At-plant T-Band	Post-plant
Cutworm, Lesser cornstalk borer	8	8

USE PRECAUTIONS AND RESTRICTIONS:

- *Do not make more than 1 application per year of this product or other products containing Chlorpyrifos.*
- Do not apply within 28 days of harvest.
- Do not apply as an in-furrow treatment.
- In **AL, FL, GA, IL, SC, NC, and VA:** DO NOT apply more than 1 lb. Chlorpyrifos a.i. per acre (6.6 lbs of this product per acre).
- In **CO, IA, IN, KS, KY, MN, MO, MT, ND, NE, NM, OH, OK, PA, SD, TN, TX, WI, WV, WY:** DO NOT apply more than 0.75 lb. Chlorpyrifos a.i. per acre (4.95 lbs of this product per acre).

SUGAR BEETS

For use ONLY in the following states: IA, ID, IL, MI, MN, ND, OR, WA, WI

Worker Restricted Entry Interval: Do not enter or allow worker entry into treated areas during the REI of 24 hours until PPE required for early entry is worn.

At-Plant T-Band Application

Use this product in a band 4 to 5 inches wide behind the planter shoe, over the drill row, and in front of press wheel. **DO NOT APPLY GRANULES IN DIRECT CONTACT WITH SEEDS.**

- In **ID, MI, MN, ND, OR, WA, and WI,** DO NOT apply more than 1.25 lb a.i. per acre (8.25 lbs of this product per acre).
- In **IA and IL,** DO NOT apply more than 1.50 lb a.i. per acre (9.9 lbs of this product per acre).

Apply 4.5 oz. of this product per 1,000 feet of row (equivalent to 6.7 lb. of this product per acre for 22-inch row spacings). Incorporate granules into the top one-half to 1 inch of soil using suitable equipment.

Post-emergence Band Application

Apply this product in a 3 to 5 inch wide band over beet row (up to 2 to 4 true leaf stage of development). Apply 4.5 oz. of this product per 1,000 feet of row (equivalent to 6.5 lb. of this product per acre for 22-inch row spacings). Incorporate into the top one-half to 1 inch of soil using suitable equipment.

	Maximum Single Application Rate See Restrictions above.	
Pest(s)	Banded Applications (Oz./1,000 ft. of row)	
	At-plant T-Band	Post-plant
Sugarbeet root maggot ¹	4.5 to 6.5	6.5
Cutworm	6.5	—
Wireworms (Suppression only)	6.5	—
SPECIFIC DIRECTIONS: ¹ Apply 4.5 oz. of this product per 1,000 feet of row (equivalent to 6.5 lb. of this product per acre for 22-inch spacings) when populations of Sugarbeet root maggot are expected to be low. If initial adult fly activity indicates higher than anticipated populations, apply Chlorpyrifos 4E-AG at or near the time of peak adult emergence to augment control.		
USE RESTRICTIONS: <ul style="list-style-type: none">• Granular insecticides, including this product, may contribute to the stress of Sugarbeet plants under certain environmental conditions. Such stress may reduce plant stand or interfere with normal plant development. Herbicides used during pre-plant incorporation may interact with insecticides and enhance this stress.• Do not apply within 30 days of harvest.• <i>Do not make more than 1 application per year of this product or other products containing Chlorpyrifos.</i>• The maximum single application rate is 4.5 oz. of this product per 1,000 feet of row (equivalent to 6.5 lb. of this product per acre for 22-inch row spacings or 1 lb. a.i./A).		

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. Open dumping is prohibited.
PESTICIDE STORAGE: Store in a cool, dry place.
PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY — CONDITIONS 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. 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.

The DREXEL logo is a registered trademark of Drexel Chemical Company.