

19713-526

5/14/2008

Page 183



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 14 2008

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

Dear Ms. Chan:

Subject: Drexel Imitator Plus Herbicide (Forage and Hay Production of Alfalfa with the Roundup Ready Gene)
EPA Registration No. 19713-526
Application Dated March 24 and May 1, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable. A stamped copy of labeling is enclosed for your records.

Supplemental labeling must be incorporated into master labeling and copies of master labeling submitted to the Agency for our files at your next printing or within two years from the date of acceptance of supplemental labeling, whichever comes first. The Agency will consider a convincing argument as to why a supplemental label should not appear on a master label on a case by case basis.

Sincerely,

W. A. Tompkins
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

283

SUPPLEMENTAL LABELING

ACCEPTED
MAY 14 2008
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended for the pesticide registered under EPA Reg. No. 19713-526



Imitator[®] Plus

Herbicide

(EPA Reg. No. 19713-526)

FOR USE AS HERBICIDE IN FORAGE AND HAY PRODUCTION OF ALFALFA WITH THE ROUNDUP READY[®] GENE

READ THE ENTIRE DREXEL IMITATOR PLUS LABEL BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABEL

KEEP OUT OF REACH OF CHILDREN

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 IMITATOR PLUS 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 IMITATOR PLUS label. Follow the instructions carefully.

Weed Control Applications in Forage and Hay Production of Alfalfa with the Roundup Ready Gene

APPLICATION INSTRUCTIONS: This product will control many troublesome emerged weeds with over-the-top applications in Roundup Ready Alfalfa. Allow at least 5 days between the last application and grazing, or, cutting and feeding of Alfalfa forage and hay.

Ground Applications

For ground applications with broadcast equipment, apply this product in 3 to 40 gallons of spray solution per acre. Carefully select proper nozzle and spray pressure to avoid spraying a fine mist. For best results with ground application equipment, use flat fan nozzles. Check for even distribution of spray droplets.

Aerial Applications

For aerial application use the recommended rates of this product in 3 to 15 gallons of spray solution per acre.

DO NOT EXCEED 2 QUARTS OF THIS PRODUCT PER ACRE WHEN MAKING APPLICATIONS BY AIR. FOR AERIAL APPLICATION IN CALIFORNIA, REFER TO THE BACK OF THE EPA REGISTERED LABEL FOR AERIAL APPLICATION IN THAT STATE. AVOID DRIFT. EXTREME CARE MUST BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS AND CROPS WHICH DO NOT CONTAIN THE ROUNDUP READY GENE.

Do not apply during low-level inversion conditions, when winds are gusty or under any other conditions that favor drift. Drift may cause damage to any vegetation contacted to which treatment is not intended. To prevent injury to adjacent desirable vegetation, appropriate buffer zones must be maintained.

See the "APPLICATION EQUIPMENT AND TECHNIQUES" section of the EPA registered label for procedures to avoid spray drift that may cause injury to any vegetation not intended for treatment.

Sprayer Preparation

It is important that sprayer and mixing equipment be clean and free of pesticide residue before making applications of this product to Roundup Ready alfalfa. Follow the cleaning procedures specified on the label of the product(s) used. Alfalfa can be very sensitive to many herbicides at extremely low concentrations and care should be taken to thoroughly clean all equipment prior to use.

TYPES OF APPLICATIONS: Preplant, At-planting, Preemergence, Postemergence and Post-harvest of seed

Maximum Allowable Combined Application Rates

Combined total per year for all applications including preplant during year of establishment	8 quarts per acre
Preplant, At-planting and Preemergence applications	2 quarts per acre
Combined total per year in-crop applications for newly established and established stands	6 quarts per acre

There are no rotational crop restrictions following applications of this product. For any crop NOT listed in this label, applications must be at least 30 days prior to planting.

Over-the-top Applications

Apply this product to Roundup Ready Alfalfa from its emergence until 5 days prior to cutting. Any single over-the-top application of this product should not exceed 2 quarts per acre. Sequential applications of this product should be at least 7 days apart.

Note: Where Roundup Ready Alfalfa is grown with a companion or cover crop, or is overseeded with a second species, over-the-top applications of this product will eliminate the non-Roundup Ready species.

During stand establishment, due to the biology and breeding constraints of Alfalfa, up to 10% of the seedlings may not contain the Roundup Ready gene and will not survive or thrive after the first application of this product. To remove the undesirable effects of stand gaps created by the loss of plants not containing the Roundup Ready gene, a single application of at least 1 quart (32 fluid ounces) per acre of this product should be applied at or before the 3 to 4 trifoliolate growth stage.

In both newly seeded and established stands, in order to maximize yield and quality potential of forage and hay, applications of this product should be made after weeds have emerged but before Alfalfa growth or regrowth interferes with application spray coverage of the target weeds.

Weeds Controlled

For specific rates of application and instructions for control of various annual and perennial weeds, refer to the "ANNUAL WEEDS RATE TABLE" and the



Manufactured By:
Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972

3 8 3

"PERENNIAL WEEDS RATE TABLE" in the EPA registered label. Some weeds with multiple germination times or suppressed (stunted) weeds may require a second application of this product for complete control. The second application should be made after some regrowth of weeds has occurred.

In addition to those weeds listed in the EPA registered label, this product will suppress or control the parasitic weed, Dodder (*Cuscuta* spp.) in Roundup Ready alfalfa seed production. Repeat applications may be necessary for complete control.

PRECAUTIONS AND RESTRICTIONS: Do not apply more than 2 quarts of this product by any single over-the-top application. Sequential applications of this product should be made at a minimum of 7-day intervals. The combined total per year for all in-crop application in newly established and established stands must not exceed 6 quarts per acre.

Before application, remove domestic livestock. Wait for at least 5 days after the last application before grazing, or cutting and feeding of the Roundup Ready Alfalfa forage and Hay.