



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUL 31 2008

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

Dear Ms. Chan:

Subject: Drexel Imitator Plus Herbicide (Aerial Application In CA)
EPA Registration No. 19713-526
Application Dated June 5, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable, provided you make the following changes before you release the product for shipment.

--For ^cClarity add a title/heading "Aerial Application In CA", to the first page of the label.--

Submit one (1) copy of your final printed labeling incorporating the above change before you release the product for shipment. Amended labeling supersedes all previously approved ones. 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 at your next printing or within two (2) 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,

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

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JUL 31 2008

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



(EPA Reg. No. 19713-526)

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.

READ ENTIRE LABEL AND USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

Avoid contact of herbicide with foliage, green stems, exposed non-woody roots or fruit of crops (except as specified for individual Roundup Ready® crops), desirable plants and trees, because severe injury or destruction may result.

See "GENERAL INFORMATION" and "MIXING" sections of the label booklet for this product for essential product performance information.

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters.

Aerial Equipment

Avoid drift. Do not apply when winds are gusty or under any other condition which favors 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.

Use the following guidelines when aerial applications are made near crops or desirable perennial vegetation after bud break and before total leaf drop, and/or near other desirable vegetation or annual crops:

1. Do not apply within 100 feet of all desirable vegetation or crop(s).
2. If wind up to 5 miles per hour is blowing toward desirable vegetation or crop(s), do not apply within 500 feet of the desirable vegetation or crop(s).
3. Winds blowing from 5 to 10 miles per hour toward desirable vegetation or crop(s) may require buffer zones in excess of 500 feet.
4. Do not apply when winds are in excess of 10 miles per hour or when inversion conditions exist.
5. Apply by air only to nonresidential areas.

Coarse sprays are less likely to drift; therefore, do not use nozzles or nozzle configurations that dispense spray as fine spray droplets. Do not angle nozzles forward into the airstream and do not increase spray volume by increasing nozzle pressure. Drift control additives may be used. When a drift control additive is used, read and carefully observe the cautionary statements and all other information appearing on the additive label.

Ensure uniform application — To avoid streaking, uneven, or over-lapped application, use appropriate marking devices. Thoroughly wash aircraft, especially landing gear, after each day of spraying to remove residues of this product accumulated during spraying or from spills. Prolonged exposure of this product to uncoated steel surfaces may result in corrosion and possible failure of the part. Landing gear is most susceptible. The maintenance of an organic coating (paint) which meets aerospace specification MIL-C38413 may prevent corrosion.

CROP USES:

Important: Do not exceed the maximum allowable aerial application rate of 64 fluid ounces per acre, which is allowed for specific crops and application timings.

Read and follow the specific labeling instructions for each crop.

Utilize allowable application rates and timing limitations that pertain to your specific cropping system and stage growth.

Aerial applications of this product are allowed in the following situations:

- 1. In fallow and reduced tillage systems prior to the emergence or transplanting of labeled crops.
- 2. In Alfalfa and Pasture renovation applications.
- 3. Over-the-top applications in Corn with the Roundup Ready gene and Cotton with the Roundup Ready gene. Refer to further label instructions for Corn with the Roundup Ready gene and Cotton with the Roundup Ready gene for specific application instructions for over-the-top applications in these crops.
- 4. Preharvest in Corn, Cotton, Wheat, Corn with the Roundup Ready gene, and Cotton with the Roundup Ready gene. Refer to the Imitator Plus herbicide label instructions for specific preharvest application instructions for each individual crop.

Do not plant subsequent crops other than those listed in the label booklet for 30 days following application.

When applied as recommended under the conditions described, this product controls annual and perennial weeds listed in the label booklet.

Use the recommended rates of this product in 3 to 15 gallons of water per acre.

When tank mixing this product with 2,4-D for aerial applications, only 2,4-D amine formulations may be used. This tank mixture may be used for fallow and reduced tillage systems and Alfalfa and pasture renovation applications only.

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For FRESNO COUNTY, CALIFORNIA ONLY (From February 15 through March 31 only)
the following applies:

Applicable Area

This section only applies to the area contained inside the following boundaries within Fresno County, California:

North: Fresno County line
South: Fresno County line
East: State Highway 99
West: Fresno County line

General Information

Always read and follow the label directions and precautionary statements for all products used in the aerial application. Observe the following directions to minimize off-site movement during aerial application of this product. Minimization of off-site movement is the responsibility of the grower, Pest Control Advisor and aerial applicator.

Written Recommendations

A written recommendation MUST be submitted by or on behalf of the applicator to the Fresno County Agricultural Commissioner 24 hours prior to the application. This written recommendation MUST state the proximity of surrounding crops, and that conditions of each manufacturer's product label and this label have been satisfied.

Aerial Applicator Training and Equipment

Aerial application of this product is limited to pilots who have successfully completed a Fresno County Agricultural Commissioner and California Department of Pesticide Regulation approved training program for aerial application of herbicides. All aircraft must be inspected, critiqued in flight and certified at a Fresno County Agricultural Commissioner approved fly-in. Test and calibrate spray equipment at intervals sufficient to insure that proper rates of herbicides and adjuvants are being applied during commercial use. Applicator must document such calibrations and testing. Demonstration of performance at Fresno County Agricultural Commissioner approved fly-ins constitutes such documentation, or other written records showing calculations and measurements of flight and spray parameters acceptable to the Fresno County Agricultural Commissioner.

Applications at Night — Do not apply this product by air earlier than 30 minutes prior to sunrise and/or later than 30 minutes after sunset without prior permission from the Fresno County Agricultural Commissioner.

Note: For aerial application from April 1 through February 14, refer to the other sections of this supplemental label.

THIS LABELING MUST BE IN THE POSSESSION OF THE USER AT THE TIME OF PESTICIDE APPLICATION. PLEASE REFER TO CONTAINER LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Imitator is a registered trademark of Drexel Chemical Company
Roundup Ready is a registered trademark of Monsanto Company



Manufactured By:
Drexel Chemical Company
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SINCE 1972