



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

SEP 1 5 2010

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

Subject:

Notification per PR Notice 98-10 (alternate brand name, revise directions)

Drexel Imitator Plus

EPA Reg. No. 19713-526

Application Dated August 25, 2010

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the subject product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

The alternate brand name "Imitator Plus Herbicide Weed and Grass Killer" for the above product has been noted in our records.

If you have any questions, please call me directly at 703-305-5697 or Mindy Ondish at 703-605-0723.

Sincerely,

Mindy andow for

Jim Tompkins Product Manager 25 Herbicide Branch Registration Division (7505P)

No		, <u>.</u>		.	· · · · · · · · · · · · · · · · · · ·			2001
SEPA	Environmenta	Inited States Protectio	•	Form Approve	Registration Amendme	on	OPP Identifie	
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1. Company/Product Number 19713-526			2. EPA Product Manager Jim Tompkins			1	oposed Classification	
4. Company/Product (Name) DREXEL IMITATOR P			PM# 25/He	rbicide Branch	1	ت [11001110104
5. Name and Address of App Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327		ode)	(b)(i), m to: EPA R	y product is sii	. In accordance milar or identica	1 in cor		
			Section - I	ct Name				
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional page(s) if necessary. (For section			l and Section)	Final printed labels in repsonse to Agency letter dated "Me Too" Application. Other - Explain below.				
CAPIBITATION: Use addition	iai page(s) ii necessai	ry, (For Section	and Section II.)			NOT	FICATIO	V
Submission of alternate nam	e for imitator Plus 1 ga	lion and less pac				SE	P 1 5 2010	
S. D. A. M. J. This D. J. A. BACH	D. D. de se de la c		Section - II	<u> </u>				
1. Material This Product Will Child-Resistant Packaging Yes No * Certification must be submitted	Unit Packaging Yes No If "Yes" Unit Packaging wgt	No. per . container	Water Soluble Pa Yes ✓ No If "Yes" Package wgt	No. per container	√ P	ntainer Metal Mastic Glass Paper Other (S	pecify)	
3. Location of Net Contents	Information	4. Size(s) Reta	ail Container 1 gallon and less	5.1	ocation of Label i		ns	
5. Manner in Which Label is	Affixed to Product	Lithogr Paper of Stencil	aph plued ed	Other			The state of the s	
			Section - I\	/			ccc	
1. Contact Point (Complete	items directly below	for identification	of individual to be	contacted, if ne	cessary, to proce	ss this	application.)	
Name LUZ G CHAN		1	Title REGISTRATION	MANAGER	ì	lephone 01) 774-	No: (ir.clude / 4370 ^c	Area Code)
I certify that the state I acknowledge that an both under applicable	y knowlinglly false or		all attachments the			ete.	E. Detc Applie Received	
2. Signature	Cuz G. Chan	3	REGISTRATION M	ANAGER			(
4. Typed Name LUZ G CHAN	-	Ę	i. Date Aug	ust 25, 201	0		`	



NOTIFICATION SEP 1 5 2010

August 25, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

Re: Submission of Alternate Name and Some Label Changes per PR Notice 98-10 DREXEL IMITATOR PLUS (EPA Reg. No. 19713-526)

Herewith:

- 1. Completed EPA Form 8570-1
- 2. Two copies (marked and unmarked) of the label (526ACSP-0810*) with the proposed alternate name, "IMITATOR PLUS HERBICIDE GRASS AND WEED KILLER" for the above product packaged in 1 gallon and less.

Also, on page 2, "and a 5 to 10% solution for woody brush and trees" was dropped from the statement "When using application methods that result in less than complete coverage, use a 5% solution for annual and perennial weeds and a 5 to 10% solution for woody brush and trees."

On page 3, the additional statements that are not applicable to the 1 gallon and less packaging were deleted.

3. Certification statement

If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370 or e-mail <u>Lchan@drexchem.com</u>.

Thank you.

Respectfully yours,

FOR DREXEL CHEMICAL COMPANY

Luz & Chan

Registration Manager

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NOTIFICATION SEP 1 5 2010



Imitator® Plus

Herbicide

Weed and Grass Killer

41% Glyphosate Concentrate with Surfactant

COMPLETE BROAD SPECTRUM POSTEMERGENCE HERBICIDE FOR VEGETATION MANAGEMENT, ORNAMENTAL WEED CON-TROL, AND NON-PLANTED AREAS AROUND RESIDENTIAL, IN-DUSTRIAL, INSTITUTIONAL LOCATIONS, AND THEIR IMMEDIATE

Controls many Annual and Perennial Grasses and Broadleaf Weeds as listed.

ACTIVE INGREDIENT:

Glyphosate: N-(Phosphonomethyl) glycine in the form of its isopropylamine salt* 41.0% OTHER INGREDIENTS: 59.0% TOTAL: 100.0%

*Contains 480 grams per liter or 4 pounds per U.S. gallon of the active ingredient glyphosate in the form of its isopropylamine salt. Equivalent to 356 grams per liter or 3 pounds per U.S. gallon of the acid, glyphosate.

KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 19713-526 **EPA Est. No. 19713-XX-XXX**

Net Content:

FIRST AID

IF ON SKIN OR CLOTHING:

- · Take off contaminated clothing.
- · Rinse skin immediately with plenty of water for 15 to 20 minutes.
- · Call a poison control center or doctor for treatment advice.

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 further treatment advice.

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.

- · 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 eve.
- · 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.

Domestic animals: This product is considered to be relatively non-toxic to dogs and other domestic animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through skin, if inhaled, or if swallowed. Causes moderate eye irritation. Avoid breathing of spray mist. Avoid contact with skin, eyes, and clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, shoes plus socks and chemical-resistant gloves (such as natural rubber, selection Category A). Follow manufacturer's instructions for cleaning/maintaing PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hand before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately before pesticide get 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

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 cleaning equipment or disposing of equipment washwaters.

PHYSICAL AND CHEMICAL HAZARDS

Spray solutions of this product should be mixed, stored, and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers. DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas, which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury if ignited by open flame, spray, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other person, either directly or through drift. Only protected handlers may be in the area at the time of application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that NOT within the scope of the WPS for agricultural pesticides (40CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep people and pets off-treated areas until spray solution has dried.

> **Drexel Chemical Company** P.O. BOX 13327, MEMPHIS, TN 38113-0327 SINCE 1972

> > 526ACSP-0810* IMITATOR PLUS Page 1 of 3

Manufactured By: 1

USE INFORMATION

READ ENTIRE LABEL BEFORE USING THIS DUCT.

For use around residential, industrial, institutional locations and their immediate vicinities.

This product mixes readily with water to be applied as a foliar spray for the control or destruction of most Herbaceous plants, It may be applied through most standard handheld sprayers after dilution and thorough mixing with water in accordance with label instructions.

This product moves through the plant from the point of foliage contact to and into the root system. Visible effects on most annual weeds occur within 2 to 4 days, but on most perennial weeds may not occur for 7 days or more. Extremely cool or cloudy weather following treatment may slow activity of this product and delay visible effects of control. Visible effects are a gradual wilting and yellowing of the plant which advances to complete browning of above-ground growth and deterioration of underground plant parts.

Unless otherwise specified on this label, delay application until vegetation has emerged and reached the stages described for control of such vegetation under the "WEEDS CONTROLLED" section of this label.

Always use the higher rate of this product per acre within the specified range when 1) weed growth is heavy or dense, or 2) weeds are growing in an undisturbed (non-cultivated) area.

Do not treat weeds under poor growing conditions such as drought stress, disease or insect damage, as reduced weed control may result. Reduced results may also occur when treating weeds heavily covered with dust.

Reduced control may result when applications are made to annual and perennial weeds that have been mowed, grazed or cut and have not been allowed to regrow to the recommended stage for treatment.

Rainfall or irrigation occurring within 6 hours after application may reduce effectiveness. Heavy rainfall or irrigation within 2 hours after application may wash the chemical off the foliage and a repeat treatment may be required.

This product does not provide residual weed control. For subsequent residual weed control, follow a label-approved herbicide program. Read and carefully observe the cautionary statements and all other information appearing on the labels of all herbicides used.

For best results, spray coverage should be uniform and complete. Do not spray weed foliage to the point of runoff.

ATTENTION: AVOID DRIFT. EXTREME CARE MUST BE USED WHEN AP-PLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS. Do not allow the herbicide solution to mist, drip, drift or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to the plants or other areas on which treatment was not intended. The likelihood of injury occurring from the use of this product is greatest when winds are gusty or in excess of 5 miles per hour, or when other conditions, including lesser wind velocities, will allow spray drift to occur. When spraying, avoid combination of pressure and nozzle type that will result in splatter or fine particles (mist), which are likely to drift.

AVOID APPLYING AT EXCESSIVE SPEED OR PRESSURE.

Note: Use of this product in any manner not consistent with this label may result in injury to persons, animals or other unintended consequences. Keep container closed to prevent spills and contamination.

MIXING, ADDITIVE AND APPLICATION INSTRUCTIONS

Prepare the desired volume of spray solution by mixing the amount of this product in water as shown in the following table:

	SPRAY SOLUTION							
Desired Volume	Amount of This Product (fl. oz.)							
	0.5%	1%	1.5%	2%	5%	10%		
1 Gallon	0.66	1.33	2	2.66	6.5	13		
	2 tat	olespoons =	= 1 fluid oun	ice	•			

For use in knapsack sprayers, it is suggested that the specified amount of this product be mixed with water in a larger container. Fill sprayer with the mixed solution.

ADDITIVE

Surfactants: Non-ionic surfactant that are labeled "for use with herbicides" may be used. Do not reduce rates of this product when adding surfactant. When adding additional surfactant, follow manufacturer's rates and recommendation for use of surfactant. Read and carefully observe surfactant cautionary statements and other information appearing on the surfactant label.

APPLICATION EQUIPMENT

Handheld Equipment

Use coarse spray only. Mix this product in clean water and apply to foliage of vegetation to be controlled. For applications made on a spray-to-wet basis, spray coverage should be uniform and complete. Do not spray to the point of runoff. For control of annual weeds listed on this label, apply a 0.5% solution of this product to weeds less than 6 inches in height or runner length. Apply prior to seedhead formation in grass or bud formation in broadleaf weeds. Allow 3 or more days before tillage or mowing.

For annual weeds over 6 inches tall, or when not using additional surfactant, or unless otherwise specified, use a 1% solution. For best results, use a 2% solution on harder-to-control perennials, such as Bermudagrass, Canada thistle, Dock, Field bindweed, Hemp dogbane and Milkweed.

When using application methods that result in less than complete coverage, use a 5% solution for annual and perennial weeds.

WEEDS CONTROLLED

This herbicide controls \vec{n}_{c} annual and perennial grasses and Broadle weeds.

ANNUAL WEEDS

- · Apply to actively growing grass and broadleaf weeds.
- · Allow at least 3 days after treatment before tillage.
- For maximum agronomic benefit, apply when weeds are 6 inches or less in height.
- To prevent seed production, applications should be made prior to seedhead formation.
- This product does not provide residual control; therefore, delay application until maximum weed emergence. Repeat treatments may be necessary to control later germinating weeds.

Weed Species		
Balsamapple	Panicum	
Momordica charantia	Panicum spp.	
Bassia, fivehook	Ragweed, common	
Bassia hyssopifolia	Ambrosia artisifolia	
Brome	Ragweed, glant	
Bromus spp.	Ambrosia trifida	
Fiddleneck	Smartweed, Pennsylvania	
Amsinckia spp.	Polygonum pensylvanicum	
Fleabane, hairy	Sowthistle, annual	
Conyza bonariensis	Sonchus oleraceus	
Fleabane	Sunflower	
Erigeron spp.	Helianthus annus	
Kochia	Thistle, Russian	
Kochia scoparia	Salsola kali	
Lettuce, prickly	Velvetleaf	
Lactuca serriola	Abutilon theophrasti	

EXTREME CARE MUST BE EXERCISED TO AVOID CONTACT OF SPRAY WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS, DESIRABLE TURFGRASSES, TREES, SHRUBS OR OTHER DESIRABLE VEGETATION SINCE SEVERE DAMAGE OR DESTRUCTION MAY RESULT.

This product does not provide residual weed control.

PERENNIAL WEEDS

When applied under the conditions described, this product WILL CONTROL the following Perennial weeds:

A 117 4	
Alligatorweed*	Pampasgrass
Anise (Fennel)	Phragmites*
Brackenfern	Poison hemlock
Guineagrass	Reed, giant
Ice plant	Ryegrass, perennial
Johnsongrass	Starthistle, yellow
Lantana	Sweet potato, wild*
Nutsedge, purple, yellow	Thistle, artichoke
*Partial control	

Alligatorweed—Apply a 1.5% solution with handheld equipment to provide partial control. Apply when most of the plants are in bloom. Repeat applications will be required to maintain such control.

Anise (Fennel), Poison hemlock—Apply a 1 to 2% solution of this product as a spray-to-wet treatment. Optimum results are obtained when plants are treated at the bud to full-bloom stage of growth. Repeat applications may be needed in succeeding years to control plants arising from seeds.

Brackenfern- Apply a 1 to 1.5% solution with handheld equipment. Apply to fully expanded fronds which are at least 18 inches long.

Guineagrass—Apply a 1% solution with handheld equipment. Apply to actively growing Guineagrass when most have reached at least the 7-leaf stage of growth. Allow 7 or more days after application before tillage.

Johnsongrass, Ryegrass (Perennial)—Apply as a 1% solution with handheld equipment. For best results, apply to actively growing plants in the Fall prior to frost. Allow 7 or more days after application before tillage.

For partial control or suppression, apply 1% solution of this product when Johnsongrass is 12 to 18 inches in height. Coverage should be uniform and complete

Lantana–Apply this product to a 1 to 1.25% solution using handheld equipment only. Apply to actively growing Lantana at or beyond the bloom stage of growth. Use the higher application rate for plants that have reached the woody stage of growth. Allow 7 or more days after application before tillage.

Nutsedge (Purple, Yellow)—Apply 1 to 2% solution from handhald equipment to control existing Nutsedge plants and immature nutlets attached to treated plants. Treat when plants are in flower or when new nutlets can be found at inizome tips. Nutlets which have not germinated will not be controlled and may germinate following treatment. Repeat treatments will be required for long-term control of ungerminated tubers.

Pampasgrass, Ice plant-Apply this product as a 1.5 to 2% solution using handheld equipment. Apply to plants that are actively growing at or beyond the boot stage of growth. Thorough coverage is necessary for best pointrol.

Phragmites—For partial control of Phragmites if and the counties of other states bordering the Gulf of Mexico, apply as a 2% ation from handheld equipment. In other areas of the U.S., apply a 1% solution from handheld equipment for partial control. For best results, treat during late Summer or Fall months or when plants are actively growing and in full bloom. Treatment before or after this stage may lead to reduced control. Due to uneven stages of growth or the dense nature of the vegetation, which may prevent good spray coverage, repeat treatments may be necessary to maintain control. Visible symptoms of control will be slow to develop.

Reed (Giant)—For control of Giant reed, apply a 2% solution of this product when plants are actively growing. Best results are obtained when applications are made in late Summer to Fall.

Starthistle (Yellow)—Best results are obtained when application are made during periods of active growth, including the rosette, bolting and early flower stages. Apply this product as a 2% solution.

Sweet potato (Wild), Thistle (Artichoke)—Apply this product as a 2% solution using handheld equipment. Apply to actively growing weeds that are at or beyond the bloom stage of growth. Repeat applications will be required. Allow the plant to reach the recommended stage of growth before retreatment. Allow 7 or more days before tillage.

EXTREME CARE MUST BE EXERCISED TO AVOID CONTACT OF SPRAY WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS, DESIRABLE TURFGRASSES, TREES, SHRUBS OR OTHER DESIRABLE VEGETATION SINCE SEVERE DAMAGE OR DESTRUCTION MAY RESULT. This product does not provide residual control.

STORAGE AND DISPOSAL

Do not contaminate water, foodstuffs, feed or seed by storage or disposal. **PESTICIDE STORAGE**: Keep container closed to prevent spills and contamination. Store in original container.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, State or Local procedures.

Emptied container retains vapor and product residue. Observe all labeled safeguards until container is destroyed.

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. Refillable Containers: 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.

For Residential/Household Use:

PESTICIDE DISPOSAL: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain. CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. If empty, place in trash or offer for recycling if available. If partially filled, call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY — DISCLAIMER

The label instructions for the use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather tond utilities, presence of other materials, or the manner of use or application, all of which are beyond the control of Manufacturer. To the extent consistent with applicable law, all such risks shall be assumed by the User.

Manufacturer warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use therein described when used in accordance with the "DIRECTIONS FOR USE" set forth, subject to the risks referred to above.

Any damage arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values or any other special or indirect damages.

To the extent consistent with applicable law, Manufacturer makes no other expressed or implied warranty including any other expressed or implied warranty of FITNESS or MERCHANTABILITY.

Additional statements

may be used on or attached to th

label:

Compares to Roundup®

Contains the same active ingredient used in Roundup®

Same Active Ingredient as Roundup®

Similar to Roundup®

Grass & Weed Killer

Weed & Grass Killer

One Quart — Makes well over 10 gallons of liquid spray. Read label before using.

One Gallon — Makes well over 40 gallons of ready to use spray. Read label before using.

Contains 3 lbs. glyphosate acid, the active ingredient used in Roundup 41% Glyphosate isopropylamine salt with full surfactant load

41% Glyphosate Concentrate with surfactant

Complete broad spectrum postemergence herbicide for vegetation management, ornamental weed control, and non-planted areas around residential, industrial locations, and their immediate vicinities

For use around residential, industrial, institutional locations and their immediate vicinities

Controls may annual and perennial grasses and broadleaf weeds as listed Postemergence Herbicide

IMITATOR and the Drexel Logo are registered trademarks of Drexel Chemical Company. [Optional Statement: All other brand names, product names, or trademarks belong to their respective holders.]

