

19713-526

2/16/2011

1 of 4



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

FEB 16 2011

Dear Ms. Chan:

Subject: Labeling Amendment; Optional Marketing Statements Header
Drexel Imitator Plus
EPA Registration No. 19713-526
Submission Date: February 15, 2011

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 is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact me at (703) 306-0415 or davis.kable@epa.gov.

Sincerely yours,

Kable Bo Davis
Product Manager 25
Herbicide Branch
Registration Division (7505P)

Enclosure- Stamped Labeling

20f4

ACCEPTED
FEB 16 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 17713-526

[ANY APPROPRIATE STATEMENT SELECTED FROM "OPTIONAL STATEMENTS" ON PAGE 3]



Imitator Plus

Herbicide

Weed and Grass Killer

41% Glyphosate Concentrate with Surfactant
COMPLETE BROAD SPECTRUM POSTEMERGENCE HERBICIDE FOR VEGETATION MANAGEMENT, ORNAMENTAL WEED CONTROL, AND NON-PLANTED AREAS AROUND RESIDENTIAL, INDUSTRIAL, INSTITUTIONAL LOCATIONS, AND THEIR IMMEDIATE VICINITIES.

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

CAUTION

See FIRST AID Below

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.

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.
- 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/maintaining 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.



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

30f4

USE INFORMATION

READ ENTIRE LABEL BEFORE USING THIS PRODUCT.

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 APPLYING 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:

Desired Volume	SPRAY SOLUTION					
	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 tablespoons = 1 fluid ounce						

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 many annual and perennial grasses and Broadleaf 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 <i>Momordica charantia</i>	Panicum <i>Panicum</i> spp.
Bassia, fivehook <i>Bassia hyssopifolia</i>	Ragweed, common <i>Ambrosia artemisiifolia</i>
Brome <i>Bromus</i> spp.	Ragweed, giant <i>Ambrosia trifida</i>
Fiddleneck <i>Amsinckia</i> spp.	Smartweed, Pennsylvania <i>Polygonum pennsylvanicum</i>
Fleabane, hairy <i>Conyza bonariensis</i>	Sowthistle, annual <i>Sonchus oleraceus</i>
Fleabane <i>Erigeron</i> spp.	Sunflower <i>Helianthus annuus</i>
Kochia <i>Kochia scoparia</i>	Thistle, Russian <i>Salsola kali</i>
Lettuce, prickly <i>Lactuca scariola</i>	Velvetleaf <i>Abutilon theophrasti</i>

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:

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 handheld 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 rhizome 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 control.

Phragmites—For partial control of Phragmites in FL and the counties of other states bordering the Gulf of Mexico, apply as a 2% solution 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 conditions, 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.

Optional Marketing Statements:

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.]