



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 29 2008

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

RE: Submission of Final Printed Label per EPA's Letter Dated January 7, 2008
EPA Registration Number: 19713-527
Date of Submission: January 22, 2008

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 22, 2008, for the product, Drexel CHLOR-PR-REX. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-527	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL CHLOR-PY-REX	PM# Insecticide-Rodenticide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

Amendment - Explain below. Final printed labels in response to Agency letter dated 1/7/2008

Resubmission in response to Agency letter dated _____ "Me Too" Application. **NOTIFICATION**

Notification - Explain below. Other - Explain below. **FEB 29 2008**

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final label (527SP-0108) incorporating the EPA's comments.
 Thank you.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
 Lithograph
 Paper glued
 Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
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Certification
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature <i>Luza Chan</i> 2008.01.22 12:21:06 -06'00'	3. Title REGISTRATION MANAGER
4. Typed Name LUZ G CHAN	5. Date January 22, 2008

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NOTIFICATION

FEB 29 2008



CHLOR-PY-REX™

Chlorpyrifos Insecticide

An Insecticide for formulating use only.

ACTIVE INGREDIENT:

Chlorpyrifos (0,0-diethyl 0-(3,5,6-trichloro-2-pyridinyl phosphorothioate)) 97.0%

OTHER INGREDIENTS: 3.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

See **FIRST AID** Below

EPA Reg. No. 19713-527

Net Contents:

EPA Est. No.

_____ Pounds

FIRST AID

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 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 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 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. You may also contact PROSAR at 1-877-250-9291 for emergency medical treatment information.

NOTE TO PHYSICIAN: Chlor-Py-Rex (chlorpyrifos) is a cholinesterase inhibitor. Initial measures include removal of secretions, maintenance of a patient airway, and if necessary, artificial respiration. When cyanosis is relieved, atropine may be administered in large therapeutic doses, repeated as necessary to the point of tolerance. If symptoms warrant further treatment, protopan chloride (pralidoxime chloride, 2-PAM chloride) has shown utility as adjunctive therapy. Never use morphine. Continued absorption of the poison may occur resulting in a fatal relapse after initial improvement. Very close supervision of the patient is indicated for at least 48 to 72 hours.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: May be fatal if swallowed. May be fatal if inhaled. Harmful if absorbed through skin. Do not breathe dust. Handle chemical in ventilated area. Avoid contact with skin, eyes, or clothing. Remove and wash contaminated clothing before reuse. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

PRECAUTIONS

Read all directions before using. Keep away from food, feedstuffs, and domestic water supplies. Keep container closed.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds, and wildlife, and extremely toxic to fish, aquatic invertebrates, and bees. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. After October 1, 2000, any manufacturing-use product formulated from this product must bear EPA-approved labeling that is consistent with the terms of the June 7, 2000, memorandum of agreement between EPA and registrants of pesticide products containing chlorpyrifos. Only for formulations into an **insecticide** for the following uses: text in [square brackets] after each site category heading refers to the general use group as referenced in 40 CFR 158. This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

A. AGRICULTURAL USES

- i) Use of this product for formulation into any end-use product bearing instructions for use on apple trees is prohibited unless the end-use product bears EPA-approved labeling prohibiting post-bloom application to apple trees.
- ii) (a) This product may only be formulated for the agricultural uses listed below if the EPA-approved labeling of the formulated product bears revised worker reentry intervals (REIs) of a duration no less than the following:
 - For all crops: 24 hours, unless specifically noted as otherwise below:
 - Cauliflower: 3 days
 - Fruit trees: 4 days
 - Citrus trees: 5 days
 (b) The end-use product labeling may include the following statement: 'Certified crop advisors or persons entering under the direct supervision under certain circumstances may be exempt from the early reentry requirement pursuant to 40 CFR 170.'
- iii) Any emulsifiable concentrate (EC) end-use product formulated from the product must be labeled as a restricted use product. All other end-use products formulated from the product must either be labeled as restricted use or packaged in containers no smaller than 15 gallons of a liquid formulation, 50 pounds of a granular formulation, or 25 pounds of any other dry formulation.

Agricultural Crops [Terrestrial Food Crop, Greenhouse Food Crop]: alfalfa; apple (post-bloom application prohibited; only one application of any chlorpyrifos containing product can be made per year to the lower 4 feet of the trunk); asparagus; banana; beet (sugar, garden/table, including crops grown for seed); blueberry; **Brassica (cole) leafy vegetables** (bok choy, broccoli, broccoli-raab, Brussels sprouts, cabbage, cauliflower, Chinese cabbage, collards, kale, kohlrabi); caneberries; cherimoya; cherries (sour, sweet); **Citrus** fruits (grape-



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

fruit; lemon, orange, citrus orchard floors); corn (field corn, sweet corn, including corn grown for seeds; maximum application rate is 3 lbs. a.i. per acre per season); cotton; cranberry; cucumber; date; feijoa; fig; grape; kiwifruit; leek; Legume vegetables (succulent or dried) (snap beans, lima beans, peas, soybeans); mint; nectarine; onion (dry bulb); peach; peanut; pear; pepper; plum; prune; pumpkin; radish (including crops grown for seed); rutabaga; sapote; seed and pod vegetables; sorghum (milo); strawberry; sugarcane; sunflower; sweet potato; tobacco; Tree nuts (almonds, filberts, pecans, walnuts, almond orchard floors); turnip; wheat; seed treatment.

Ornamentals – Commercial Production Only [Commercial Terrestrial Non-Food, Commercial Greenhouse Non-Food]:

- Soil treatment of potted, containerized, or balled and burlapped nursery stock plants in nurseries and greenhouses only.
- Flowers, shrubs, evergreens vines, shade, and flowering trees in nurseries or greenhouses only.
- Christmas trees.
- Forest tree nurseries.
- Non-bearing fruit, nut and citrus trees.
- Commercial sod farms.
- Grass grown for seed.

Forest trees [Forestry]: Plantations, forest, seed orchards, felled trees, cut stumps.

Commercial Livestock Housing: Cattle ear tags, poultry houses, turkey barns, swine barns, and dairy barns.

B. NON-AGRICULTURAL, NON-TERMITE CONTROL USES:

After December 1, 2000, this product may only be used to formulate an end-use pesticide product labeled for non-agricultural, non-termite control uses in accordance with the following conditions:

- Any emulsifiable concentrate (EC) end-use product formulated from this product must be labeled as a restricted use product. All other end-use products formulated from the product (other than containerized ants and roach baits in child-resistant packaging) must either be labeled as restricted use or packaged in containers no smaller than 15 gallons of a liquid formulation or 25 pounds of a dry formulation.
- The end-use product may not bear use directions for any indoor residential use (as that term is defined in 40 CFR 152.3) other than containerized ants and roach baits in child-resistant packaging.
- Any emulsifiable concentrate (EC) end-use product formulated from this product may not bear use directions for any indoor non-residential use. All other end-use products may not bear use directions for any indoor non-residential use other than one or more of the following uses: warehouses, ship holds, railroad boxcars, industrial plants, manufacturing plants, food processing plants, or containerized ants and roach baits in child-resistant packaging.
- The product may not bear use directions for any residential outdoor use other than one or more of the following public health uses: individual fire ant mound treatment.
- The product may not bear use instructions for any non-residential outdoor use other than one or more of the following uses:
 - golf courses, road medians, and industrial plant sites, provided that the maximum label application rate is no greater than 1 lb. a.i. per acre;
 - mosquito control for public health purposes;
 - individual fire ant mound treatment for public health purposes;
 - fence posts, utility poles, railroad ties, landscape timbers, logs, pallets, poles and posts; and
 - containerized pots in nurseries.

Pest Control Indoors [Indoor Residential]: Containerized ants and roach baits in child-resistant packaging for indoor residential uses.

Commercial Pest Control Indoors [Indoor Non-Residential]: Ship holds, railroad boxcars, industrial plants, manufacturing plants, food processing plants only.

Commercial Pest Control Outdoors [Terrestrial Non-Food; Commercial Non-Residential]

- Localized exterior surface treatment of warehouses, railroad boxcars, industrial plants, manufacturing plants, food processing plants only.
- Underground utility cables and conduits.
- Turf and ornamentals in road medians; turf and ornamentals in industrial plant sites (provided the use rate is no greater than 1 lb. a.i. per acre).

Turf [Terrestrial Non-Food]: Golf course turf, turf in road medians, and turf in industrial plant sites (provided the use rate is no greater than 1 lb. a.i. per acre).

C. OTHER USES: This product may be formulated into insecticide products for other uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in supports of registration excluding any use strictly prohibited by this label.

D. EXPERIMENTAL USES: This product may be formulated into insecticide products for uses for experimental purposes that are in compliance with U.S. EPA requirements.

E. PROHIBITED USES: All manufacturing-use and end-use products produced from this product must bear the following statement: "This product may NOT be used for formulation into manufacturing-use or end-use products for the following uses: **Aquatic Uses (Aquatic Food Crop, Aquatic Non-Food):** Any aquatic use, including mosquito larvicide; Termiticide uses."

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

STORAGE: Store in original container in secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. Do not store above 100°F for extended periods of time. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site if approved waste handling facilities are available or at an approved waste disposal facility.

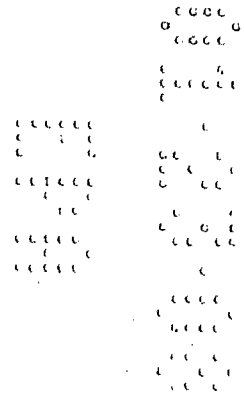
CONTAINER DISPOSAL: Triple rinse (or equivalent), perforate rinsed containers, and offer for disposal in a landfill approved for pesticide containers. Do not reuse containers. do not cut or weld container.

IN CASE OF A SPILL: Isolate the spill. Hold this package, other cargo, and vehicles involved. Immediately TELEPHONE (24-hour service) for emergency assistance, 1-800-424-9300.

GENERAL: Consult Federal, State, or Local disposal authorities for approved alternative procedures.

WARRANTY—CONDITIONS OF SALE

Seller warrants that at the time of delivery, the product in this container conforms to its chemical description contained herein and is reasonably fit for its intended purpose under normal conditions of use. This is the only warranty made on this product. Seller expressly disclaims any implied warranties of merchantability or fitness for any particular purpose and, except as set forth above, any other expressed or implied warranties. Any damages arising from breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid for this product by Buyer, and shall not include incidental or consequential damages such as, but not limited to, loss of profits or values. 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 the Seller. To the extent consistent with applicable law, in no such case shall Seller be liable for the consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.





Drexel Chemical Company

January 22, 2008

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

**Re: Submission of Final Printed Label per EPA's Letter Dated January 7, 2008
DREXEL CHLOR-PY-REX (EPA Reg. No. 19713-527)**

Reference is made to the above.

Herewith:

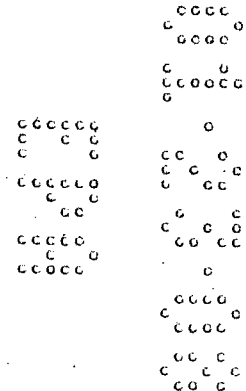
1. Completed EPA Form 8570-1.
2. One (1) copy of the final label (527SP-0108) for your record and file.
3. Certification Statement per PR Notice 98-10

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

Thank you.

Respectfully yours,
DREXEL CHEMICAL COMPANY

Luz G. Chan
Luz G Chan
Registration Manager



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