Form Approved. OMB No. 2070-0060 Please read instructions on reverse before completing form **OPP Identifier Number** Registration **United States** Environmental Protection Agency **Amendment** Washington, DC 20460 Other Application for Pesticide - Section I 1. Company/Product Number 2. EPA Product Manager 3. Proposed Classification 19713-536 JIM TOMPKINS ✓ None Restricted 4. Company/Product (Name) PM# DREXEL DEFOL TECHNICAL 25/Herbicide Branch 5. Name and Address of Applicant (Include ZIP Code) 6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling Drexel Chemical Company, P.O. Box 13327 EPA Reg. No. MEMPHIS, TN 38113-0327 Check if this is a new address **Product Name** Section - II Final printed labels in repsonse to Amendment - Explain below. 5/24/2002 Agency letter dated NUTIFICATION "Me Too" Application. Resubmission in response to Agency letter dated... Notification - Explain below. Other - Explain below. JUN 1 4 2002 Explanation: Use additional page(s) if necessary. (For section I and Section II.) Three (3) copies of the final printed label (536SP-0602++) are submitted for your kind record and file. Details of the changes are in the cover letter accompanying this submission. The required certification statement is also, herewith. Thank you. Section - III 1. Material This Product Will Be Packaged In: Child-Resistant Packaging Unit Packaging Water Soluble Packaging 2. Type of Container Yes Plastic No Glass Paper If "Yes" If "Yes" No. per Cartification must Unit Packaging wgt. container Package wgt container Other (Specify) be submitted 3. Location of Net Contents Information 4. Size(s) Retail Container 5. Location of Label Directions Container 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.) Title Telephone No. (Include Area Code) **LUZ G PIWONKA** (901) 774-4370 REGISTRATION MANAGER 6. Unto Application Certification Received I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete, I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. 2. Signature 3, Title S. Fiwonla **REGISTRATION MANAGER** 4. Typed Name **LUZ G PIWONKA** June 7, 2002



June 7, 2002

Document Processing Desk (FINAL)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm 266A, Crystal Mall 2
1921 Jefferson Davis Hwy.
Arlington, VA 22202

ATTN: Mr. Jim Tompkins, PM 25/Herbicide Branch

Re: Submission of Final Printed Label per EPA's Letter Dated May 24, 2002 DREXEL DEFOL TECHNICAL (EPA Reg. No. 19713-536)

Dear Mr. Tompkins

Reference is made to the above. Herewith please find:

- 1. Completed EPA Form 8570-1.
- Three (3) copies of the final printed label (536SP-0602++) for your record and file. Please take note of the following changes per your letter of 5/24/02:
 - i) The required statement was added immediately beneath the signal word.
 - ii) The contact number for the National Pesticide Information Center was added

We did not revise the Disposal instructions according to PR Notice 2001-6 as you suggested as our understanding is that PR Notice 2001-6 applies to Non-Antimicrobial Residential/Household use product labels.

3. Certification Statement per PR Notice 98-10

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

Thank you.
Respectfully

DREXEL CHEMICAL COMPANY

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Luz G Piwonka Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327 Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: drexchem@bellsouthinet



June 7, 2002

Submission of Final Printed Label per EPA's Letter dated May 24, 2002 DREXEL DEFOL TECHNICAL (EPA Reg. No. 19713-536)

This notification is consistent with the Provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

FOR DREXEL CHEMICAL COMPANY

LUZ G PIWONKA Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327 Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: drexchem@bellsouth.net



NOTIFICATION

JUN 1 4 2002

Defol® Technical

Manufacturing Use Only: For use in the manufacturing of herbicides and defoliants and in the manufacture of products for generating chlorine dioxide for use as a biocide.

ACTIVE INGREDIENT:

Sodium chlorate						٠.,				99.5%
OTHER INGREDIENTS:										
TOTAL:										100.0%

DANGER / PELIGRO

This product contains a chemical known to the state of California to cause capear

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See FIRST AID Below

EPA Reg. No. 19713-536 EPA Est. No.

Net Contents:

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 vomitting 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.

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. 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Harmful if swallowed. Causes irritation of the eyes, skin, nose, throat and the digestive tract. Remove and wash contaminated clothing promptly. Do not wear leather shoes, gloves or belts. Wear rubber boots and apron to avoid contact with clothing. Do not smoke when handling. Always have a water filled jump tank or deluge shower in immediate work area. If your clothing catches fire, do not use a fire blanket. Use the jump tank or deluge shower.

ENVIRONMENTAL HAZARDS

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 Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing broduct 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.

PHYSICAL / CHEMICAL HAZARDS

Strong oxidizer — Contact with other material may cause fire or produce shock-sensitive mixtures. Keep from contact with clothing and other combustible materials. Store separately and keep from contact with explosives, flammable materials, charcoal, sugar, acids, sulfur, sulfur compounds, starch, shellac, ammonium compounds, phosphorus, metal powders and other oxidizable materials. Store in original, tightly closed container. Keep away from fire. Keep from contact with sparks, impact, abrasion or any other source of heat.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Formulators or repackagers of this product must obtain their own registrations from the Environmental Protection Agency. Products must include an appropriate fire retardant chemical other than water.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. PESTICIDE STORAGE: Store separately and keep from contact with explosives, flammable materials, charcoal, sugar, acids, sulfur, sulfur compounds, starch, shellac, ammonium compounds, phosphorus, metal powders and other oxidizable materials. Spillage may cause fires. Do not get on floor. Sweep into clean metal container and remove immediately. Keep away from fire. Do not smoke when handling. Do not drop, skid or slide containers. When not in use. keep tightly closed in original metal container. Do not sell or store this product in anything other than the original metal container. PESTICIDE DISPOSAL: Pesticide wastes are acutely toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guldance. CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved of by state and local authorities.

WARRANTY-CONDITIONS OF SALE

Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the "directions for use". Manufacturer makes no other warranties, expressed or implied, including FITNESS or MERCHANTABILITY in no case shall the Manufacturer or the Seller be liable for consequential, special graindirect damages resulting from the use or handling of this product. The foregoing is a condition of sale and is accepted as such by the Buver.

Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 381 2-0327