

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460United States
Environmental Protection
AgencyOffice of Pesticide Programs

Dr. John French
Director, Regulatory Affairs
Drexel Chemical Company
1700 Channel Ave.
Memphis, TN 38113-0327

JAN 14 2008

Subject: Amendment – Revised Letter
Me-Too-Lachlor II
EPA Reg. No.: 19713-549

Dear Dr. French,

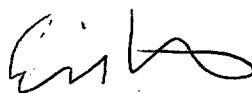
The Agency has received your application for label amendments to the product described above, dated August 15, 2007. You have submitted separate supplemental booklets (one for each product in the co-pack), as well as a general label containing information and instructions for the co-pack; however, the supplemental booklets are not necessary as the products are intended to only be used together as a tank-mix. The supplemental booklets are therefore not considered part of this approved label. The draft label consisting of 3 pages with boxes specific to each included product is the label the Agency is approving under this decision. The label described above, submitted under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided the following modifications are made:

1. Warranty Statement: Update language to comply with current requirements. Any limitations of liability must be prefaced with, "To the extent consistent with applicable law..."
2. Me-Too-Lachlor II box – hazards to humans and domestic animals statement: Add the statement, "This product may cause skin sensitization reactions in some people."
3. Engineering Control Statements: Add the following statement, per the metolachlor RED: "Mixers and loaders supporting aerial applications are required to use closed systems. The closed system must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4). When using the closed system, the mixers' and loaders' PPE requirements may be reduced or modified as specified in the WPS."

This labeling supersedes all previous accepted labeling for this product. A stamped accepted copy of the label is included for your records.

Please submit one (1) copy of the final printed label before the product is released for shipment. If you have any questions, please contact Kathryn Montague (703-305-1243 or montague.kathryn@epa.gov).

Sincerely,



Erik Kraft
Acting Product Manager 23
Herbicide Branch
Registration Division (7505P)

A co-pack of **Me-Too-Lachlor II** (EPA Reg. No. 19713-549) with **Imitator Xtra** (EPA Reg. No. 19713-597) for control of weeds in Corn (Field corn, Sweet corn, Pop Corn)

Handwritten: 375

Me-Too-Lachlor™ II

EPA Reg. No. 19713-549

Active Ingredient: Metolachlor 84.4%
 Other Ingredients: 15.6%
 Total: 100.0%

Contains 7.8 pounds metolachlor per gallon

Net Contents: 128 fl.oz. U.S. Standard Measure

Hazards to Humans and Domestic Animals

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

Me-Too-Lachlor is a trademark of Drexel Chemical Company.

Handwritten: Slowly

Imitator® Xtra

EPA Reg. No. 19713-597

Active Ingredient: Glyphosate
 in the form of its potassium salt* 35.62%
 Inert Ingredients 64.38%
 Total 100.0%

*Contains 440 grams per liter or 3.67 pounds per U.S. gallon of the active ingredient glyphosate, in the form of its potassium salt, equivalent to 360 grams per liter or 3 pounds per U.S. gallon of the acid, glyphosate.

Net Contents: 192 fl.oz. U.S. Standard Measure

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing vapor or spray mist.

Imitator is a registered trademark of Drexel Chemical Company.

Keep Out of Reach of Children

CAUTION

Read the entire label before using this product. Use only according to label instructions. Read "WARRANTY-CONDITION OF SALE" before buying or using. If terms are not acceptable, return product unopened without delay.

FIRST AID	
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 15-20 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 15-20 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.
IF SWALLOWED:	Call a poison control center or doctor immediately for treatment advice. Have affected person sip a glass of water if able to swallow. Do not induce vomiting unless told by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
Emergency phone numbers	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.
FOR CHEMICAL SPILL, LEAK, FIRE OR EXPOSURE CALL TOLL FREE 1-800-424-9300.	

EPA Est. No. _____

Manufactured by
 Drexel Chemical Company
 1700 Channel Avenue
 Memphis, TN 38106

ACCEPTED
 with COMMENTS
 In EPA Letter Dated:

JAN 14 2008

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

19713-549

This co-pack includes two containers. Each container consists of two cells bound together. The contents of both cells are designed to be used and applied together to the intended site. Personal protective equipment and agricultural use requirements subject to the Worker Protection Standard are hereby stated in accordance with the most protective of the two product labels.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category H on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate or viton
- Chemical-resistant footwear plus socks
- Chemical-resistant headgear for overhead exposure and
- Chemical-resistant apron when cleaning equipment, mixing or loading

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statements

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 160.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

Need to add statement in RED - aerial?

User Safety Recommendations

Users should:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.
- 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.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

DIRECTIONS FOR USE

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

The entire contents of both cells of each container are designed to be used simultaneously in tank mixture, and are intended to be applied to ten (10) acres of each respective crop. Read and follow the each product's Directions for Use attached to each cell.

Agricultural Use Requirements

Use these products only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

This co-pack includes two separate products which are designed to be used and applied together to the intended site. Agricultural use requirements subject to the Worker Protection Standard are hereby stated in accordance with the most protective of the two product labels:

Do not enter or allow worker entry into treated areas during the **restricted entry interval (REI) of 24 hours.**

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves, such as barrier laminate or Viton
- Shoes plus socks

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

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A co-pack of **Me-Too-Lachlor II** (EPA Reg. No. 19713-549) with **Imitacil Extra** (EPA Reg. No. 19713-597) for control of weeds in Corn (Field corn, Sweet corn, Pop Corn)

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: This container is non-refillable. Do not reuse container. Triple rinse container, then puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Instructions for recycling: When the container is empty and triple-rinsed, replace the caps and seal all openings that have been opened during use, then return the container to the point of purchase of this product. Do not transport if this container is damaged or leaking. If the container is damaged, leaking, or obsolete, or to obtain information about recycling containers, contact Drexel Chemical Company at (901) 774-4370.

WARRANTY - CONDITIONS OF SALE

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 must be followed carefully, however, it is impossible to eliminate all risks inherently associated with 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 Drexel Chemical. All such risks shall be assumed by the user. Drexel Chemical 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", 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, Drexel Chemical makes no other expressed or implied warranty including any other expressed or implied warranty of FITNESS or MERCHANTABILITY.

8/15/2007

*To the extent consistent with applicable law -
limit of liability must be preserved with*