



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 29, 2024

Kresti Lyddon
Lewis & Harrison, LLC
Agent for Drexel Chemical Company
2461 S. Clark St.
Ste 710
Arlington, VA 22202

Subject: Label Amendment – Label changes based on the 2022 National Marine
Fisheries Service Biological Opinion on Chlorpyrifos
Product Name: Drexel Chlorpyrifos Technical
EPA Registration Number: 19713-573
Application Date: August 16, 2022
Decision Number: 594852

Dear Kresti Lyddon:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Chlorpyrifos 2022 Biological Opinion. The Agency has concluded that your submission is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved by the Agency. In accordance with 40 CFR § 152.130(c), Drexel Chemical Company (Drexel) may not distribute or sell this product under the previously approved labeling after the final cancellation order is issued. Drexel may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false

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or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Patricia Biggio at 202-566-1938 or at biggio.patricia@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dana L. Friedman". The signature is fluid and cursive, with the first name "Dana" being more prominent.

Dana L. Friedman
Branch Chief
Risk Management and Implementation Branch I
Pesticide Re-evaluation Division

Enclosure

CC: Michael Walsh, Registration Division, PM11

ACCEPTED

Sep 29, 2024

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 19713-573

Drexel

Chlorpyrifos Technical

An Insecticide for formulating use only.

ACTIVE INGREDIENT:

Chlorpyrifos..... 98.0%

OTHER INGREDIENTS:..... 2.0%

TOTAL:..... 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING / AVISO

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]

[See Side (Back) Panel for FIRST AID];

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EPA Est. No. 19713-XX-X

Net Contents:

_____ Gals. (_____ L)

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 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 call CHEMTREC at 800-424-9300 for emergency medical treatment information.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. Initial treatment measures include removal of secretions, maintenance of 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, protopam chloride (pralidoxime chloride, 2-PAM chloride) has shown utility as adjunctive therapy. Never use morphine. Continued absorption of the poison may occur, resulting in fatal relapse after initial improvement in condition. 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. Do not breathe dust. Remove contaminated clothing and wash clothing before reuse. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Manufactured For:

Drexel Chemical Company

P.O. Box 13327, Memphis, TN 38113-0327

SINCE 1972

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ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds and wildlife and extremely toxic to fish and aquatic organisms. 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.

This product may only be formulated into registered end-use products with EPA-approved labeling that contains the following language and restrictions per the Reasonable and Prudent Measure 1, (a, b, c, d) in the National Marine Fisheries Service nationwide Final Revised Biological Opinion: Chlorpyrifos, Diazinon, Malathion, dated June 30, 2022.

This product may only be formulated into end-use products that contain the following language on their labeling (to be placed at the beginning of the Directions for Use section of all end-use product labels) when they are released for shipment: "ENDANGERED SPECIES PROTECTION REQUIREMENTS": It is a Federal offense to use any pesticide in a manner that results in an unauthorized "take" (e.g., kill or otherwise harm) of an endangered species, and certain threatened species, under the Endangered Species Act section 9. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the area in which you are applying the product. You must obtain a Bulletin no earlier than six months before using this product. To obtain Bulletins, consult <http://www.epa.gov/espp/>, call 1-844-447-3813, or email ESPP@epa.gov. You must use the Bulletin valid for the month in which you will apply the product.

This product may only be formulated into end-use products that contain the following language on their labeling when they are released for shipment: "Reporting Ecological Incidents: To report ecological incidents, including mortality, injury, or harm to plants and animals, call 901-774-4370."

DIRECTIONS FOR USE

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

FOR MANUFACTURING USE ONLY

CHLORPYRIFOS TECHNICAL may be used only for formulation into other manufacturing-use products or end-use products for uses accepted by the United States Environmental Protection Agency. Because of their properties and intended uses, insecticidal formulations containing CHLORPYRIFOS TECHNICAL will require precautionary labeling different from that given.

Formulators should develop their own use and precautionary labeling based on the properties and intended use of their own finished formulations and are responsible for obtaining EPA registrations of these products.

CHLORPYRIFOS TECHNICAL MAY BE FORMULATED ONLY INTO END-USE PRODUCTS WITH THE FOLLOWING USES ON THE LABEL:

This product may only be formulated for the agricultural uses listed below if the EPA-approved labeling of the formulated product bears revised worker Re-Entry Intervals (REIs) of a duration no less than the following:

For all crops: 24 hours, unless specifically noted otherwise below.

Fruit trees: 4 days

Citrus trees: 5 days

The end-use product labeling may include the following statement: "Certified crop advisors or persons entering under their direct supervision under certain circumstances may be exempt from the early re-entry requirement pursuant to 40 CFR Part 170."

Agricultural Uses –

ALFALFA: For use ONLY in the following states: AZ, CO, IA, ID, IL, KS, MI, MN, MO, MT, NE, NM, NV, ND, OK, OR, SD, TX, UT, WA, WI, WY

APPLES: For use ONLY in the following states: AL, DE, DC, GA, ID, IN, KY, MD, MI, NJ, NY, OH, OR, PA, TN, VA, VT, WA, WV

ASPARAGUS: For use ONLY in the following state: MI

CHRISTMAS TREE PLANTATIONS

CITRUS FRUITS (Grapefruit, Lemons, Oranges and Other Citrus Fruits): For use ONLY in the following states: AL, FL, GA, NC, SC, TX

COTTON: For use ONLY in the following states: AL, FL, GA, NC, SC, VA

PEACH: For use ONLY in the following states: AL, DC, DE, FL, GA, MD, MI, NC, NJ, NY, OH, PA, SC, TX, VA, VT, WV

SOYBEANS: For use ONLY in the following states: AL, CO, FL, GA, IA, IL, IN, KS, KY, MN, MO, MT, NC, ND, NE, NM, OH, OK, PA, SC, SD, TN, TX, VA, WI, WV, WY

SUGAR BEETS: For use ONLY in the following states: IA, ID, IL, MI, MN, ND, OR, WA, WI

STRAWBERRIES: For use ONLY in the following state: OR

TART CHERRY: For use ONLY in the following state: MI

TOBACCO

WHEAT

SPRING WHEAT: For use ONLY in the following states: CO, KS, MO, MT, ND, NE, SD, WY

WINTER WHEAT: For use ONLY in the following states: CO, IA, KS, MN, MO, MT, ND, NE, OK, SD, TX, WY

Non-Agricultural Uses – Non-Residential Outdoor Pest Control (Golf courses, Road medians and Industrial plant sites); and, Non-Residential Ornamentals (Flowers, Shrubs, Vines, Shade & Flowering trees, Non-bearing Fruit, Nut and Citrus trees, and Evergreens), Sod farms, Perennial grass seed crops, Annual and Perennial plants, Road medians and Industrial plant sites.

ANY USE TO FORMULATE MANUFACTURING-USE OR END-USE PRODUCTS INTENDED FOR USE ON TOMATOES, INDOOR, GREENHOUSE, PAINT ADDITIVE, PET CARE, ANIMAL HEALTH OR FOR MOSQUITO CONTROL IS STRICTLY PROHIBITED.

End-use products containing directions for use in nursery operations must be restricted to wholesale nursery operations only. Wholesale nursery operations are commercial agricultural operations, which do not sell or distribute directly to consumers or the general public through retail sales. The end-use products must also contain a prohibition against selling or distributing treated plants directly to consumers or the general public through retail sales.

ALL MANUFACTURING-USE PRODUCTS PRODUCED FROM THIS PRODUCT MUST BEAR A STATEMENT PROHIBITING FORMULATION OF SUCH PRODUCTS FOR USES OTHER THAN IDENTIFIED ABOVE.

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 end-use products formulated from this product must be labeled as restricted use or packaged in containers no smaller than 50 pounds for granular formulations. 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 or 25 pounds of a dry formulation.

The product may not bear use directions for any residential outdoor use.

The product may not bear use instructions for any non-residential outdoor use other than one or more of the following uses:

- (a) 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; and

(b) Fence posts, Utility poles, Railroad ties, Landscape timbers, Logs, Poles and Posts.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area away from heat or open flame. Protect from moisture. Avoid contamination with water, acids or alkalis. Keep container closed. Store in original container in locked storage area. In Case of Spill: Isolate the spill. Hold this package, other cargo and vehicles involved. For Emergency spill assistance call CHEMTREC (24-hour service): 1-800-424-9300.

PESTICIDE DISPOSAL: Rinse spray equipment. Any pesticide, spray mixture or rinse water that cannot be used according to label instructions or chemically reprocessed should be disposed of in a landfill approved for pesticides.

CONTAINER DISPOSAL:

Nonrefillable Container: 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. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal.

Repeat this procedure two more times. If recycling is not available puncture or dispose of in a sanitary landfill or incineration or if allowed by state and local authorities by burning. If burned, stay out of smoke. Perforate rinsed containers, and offer for disposal in a landfill approved for pesticide containers. Do not reuse containers. Do not cut or weld container.

Refillable Container: 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 content from this container into manufacturing equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into manufacturing equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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*". To the extent consistent with applicable law, Manufacturer makes no other warranties, expressed or implied, including FITNESS or MERCHANTABILITY. To the extent consistent with applicable law, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use of handling of this product. The foregoing is a condition of sale and is accepted as such by the Buyer.

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