

19713-575

3/29/2010

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



OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

March 29, 2010

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

Subject: Label Notification per Pesticide Registration Notices 98-10 and 2007-4

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notices (PRNs) 98-10 and 2007-4, dated March 19, 2010, for Drexel Chlorpyrifos 99% Technical, EPA Reg. No. 19713-575.

The Registration Division (RD) has conducted a review of this request for applicability under PR Notices 98-10 and 2007-4, and finds that the label changes requested fall within the scope of PR Notices 98-10 and 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself, and can be added by non-notification per PR Notice 98-10.

If you have any questions, please contact me directly at 703-308-8735 or email me at [chao.julie@epa.gov](mailto:chao.julie@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Julie A. Chao".

Julie A. Chao  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 19713-575	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL CHLORPYRIFOS 99% TECHNICAL	PM# 061 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**

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____	<b>NOTIFICATION</b>  <b>MAR 29 2010</b>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

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

Submission of revised label per PR Notices 2007-4 and 98-10. Details are in the cover letter accompanying this submission.

Thank you.

**Section - III**

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input checked="" 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 <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 283.5 kg (625 lbs.)		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> 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) (601) 774-4376
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  <b>(Stamped)</b>
2. Signature <i>Luza Chan</i>	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date March 19, 2010	



**Drexel Chemical Company**

March 19, 2010

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

**NOTIFICATION**

**MAR 29 2010**

**Re: Submission of Revised Label by Notification per PR Notices 2007-4 and 98-10  
DREXEL CHLORPYRIFOS 99% TECHNICAL (EPA Reg. No. 19713-575)**

Herewith:

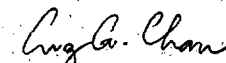
1. Completed EPA Form 8570-1
2. Two copies of the label (marked and clean) (575SP-0310\*) with updated container disposal statements, warranty statements, and trademark ownership statement.

The changes were highlighted for easy reference.

3. Certification Statements

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

Respectfully yours,  
FOR DREXEL CHEMICAL COMPANY

  
Luz G Chan  
Registration Manager

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Drexel Chemical Company

March 19, 2010

**NOTIFICATION**

**MAR 29 2010**

***Submission of Revised Label by Notification***

**DREXEL CHLORPYRIFOS 99% TECHNICAL (EPA Reg. No. 19713-575)**

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 CHAN

Registration Manager

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NOTIFICATION

MAR 29 2010



# Chlorpyrifos 99% Technical

For manufacturing use only.

**ACTIVE INGREDIENT:**

Chlorpyrifos .....	99.0%
<b>OTHER INGREDIENTS:</b> .....	<u>1.0%</u>
<b>TOTAL:</b> .....	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

EPA Reg. No. 19713-575

Net Content:

EPA Est. No.

\_\_\_\_\_ Pounds

FIRST AID	
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a physician or Poison Control Center immediately.</li> <li>• Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN:</b>	<ul style="list-style-type: none"> <li>• Immediately wash with plenty of soap and water.</li> <li>• Get medical attention.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Flush with plenty of water for 5 minutes.</li> <li>• Get medical attention.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Remove to fresh air if symptoms of cholinesterase inhibition appear.</li> <li>• Get medical attention immediately.</li> </ul>
<p>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 Telecommunications Network at 1-800-858-7378.</p>	
<p><b>NOTE TO PHYSICIAN:</b> Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate significance of exposure (baseline data are useful). Atropine, only by injection, is the preferable antidote. Oximes, such as 2-PAM/protopam, may be therapeutic if used early; however, use only in conjunction with atropine. In case of severe acute poisoning, use antidote immediately after establishing an open airway and respiration.</p>	

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans and Domestic Animals**  
**WARNING:** May be fatal if swallowed. Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Handle chemical in a ventilated area. Wash thoroughly with soap and water before eating, drinking, chewing gum, using tobacco or using the toilet.

**GENERAL PRECAUTIONS**  
Read all directions before using.

**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.

**DIRECTIONS FOR USE**  
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. The June 7, 2000 memorandum of agreement between EPA and registrants of pesticide products containing chlorpyrifos only applies to registered uses of chlorpyrifos in the U.S.

**FOR MANUFACTURING USE ONLY**  
**Manufacturing-Use Product Labeling Requirements**  
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.  
This product may **ONLY** be formulated into manufacturing-use insecticide products or end-use insecticide products for the following uses. Text in square brackets (e.g. [Indoor Food]) after each site category heading refers to the general use group as referenced in 40 CFR 158.

**Agricultural Uses**  
**Agricultural Crops [Terrestrial Food Crop, Greenhouse Food Crop]:**  
Alfalfa, Apple (post-bloom application prohibited), Asparagus, Ailanto, Bean (Snap, Lima), Beet (Sugar, Table, including crops grown for seed), Blueberry, Brassica (Cole) Leafy vegetables (Bok choy, Broccoli, Broccoli raab, Brussels sprout, Cabbage, Chinese cabbage, Cauliflower, Collard, Kale, Kohlrabi), Caneberry, Cherimoya, Cherry (Sour, Sweet), Citrus (Lemon, Orange, Grapefruit and Citrus, other) Citrus orchard floor, Corn (Field, Sweet, including crops grown for seed), Cotton, Cranberry, Cucumber, Date, Feijoa, Fig, Grape, Kiwifruit, Leek, Legume vegetables, Mint, Nectarine, Onion (Dry Bulb), Pea, Peach, Peanut, Pear, Pepper, Plum, Prune, Pumpkin, Radish (including crops grown for seed), Rutabaga, Sapote, Seed and Pod vegetables, Sorghum (Grain, Milo), Soybean, Strawberry, Sugarcane, Sunflower, Sweet potato, Tobacco, Tree nuts (Almond, Filbert, Pecan, Walnut, other), Turnip, Wheat, and Seed treatment; in addition, this product may be used to formulate products for any additional crop uses not listed on this label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such uses;



**Livestock [Indoor Food]:** Cattle ear tags, r. ential animal housing including but not limited to poultry houses, feedlots, corrals, stockyards, holding pens, and other livestock holding areas.

**Ornamentals – commercial production only [Commercial Terrestrial Non-Food, Commercial Greenhouse Non-Food]:** Greenhouse, outdoor (excluding any residential outdoor use), field grown and nursery grown ornamentals (including, but not limited to flowers, shrubs, evergreens, vines, shade and flowering trees, and non-bearing fruit, nut, and citrus trees); Christmas tree plantations, nurseries, forest tree nurseries, sod farms, perennial grass seed crops, soil treatment of potted, containerized or balled and burlapped nursery stock plants in nurseries and greenhouses only; annual and perennial plants.

**Forest Trees [Forestry]:** Plantations, forests, seed orchards, felled trees, and cut stumps.

**If the product is labeled for reformulation into products bearing labeling for agricultural uses, the label may not contain instructions permitting formulation into products registered for tomatoes. In addition, the label must contain the following statements:**

- 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.
- 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
- 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 reentry requirement pursuant to 40 CFR Part 170.'
- Any emulsifiable concentrate (EC) end-use product formulated from the product must be labeled as a Restricted Use Pesticide. All other end-use products (except for cattle ear tags) 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.

#### **Non-Agricultural, Non-Termite Control Uses**

**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./acre).

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

**Pest Control Indoors [Indoor Non-residential]:** Crack, crevice, and spot treatments in food and non-food areas of non-residential buildings and structures including warehouses, ship holds, railroad boxcars, industrial plants, manufacturing plants, food processing plants such as bakeries (not in food service establishments), bottling facilities, breweries, food manufacturing plants, granaries, grain mills and wineries; or containerized baits in child-resistant packaging.

**Pest Control Outdoors [Terrestrial Non-Food, Domestic Outdoor]:** Public health uses to control fire ant mounds. Public health uses as a mosquito adulticide; mosquito control may only be applied by trained personnel of public health organizations, mosquito abatement districts, public mosquito control programs, and professional pest control operators.

**Pest Control Outdoors [Terrestrial Non-Food]:** Underground utility cables and conduits in non-residential sites; sewer manhole lids and walls; turf and ornamentals in road medians as well as turf and ornamentals in industrial plant sites (provided the use rate is not greater than 1 lb a.i./acre); localized exterior surface treatment of warehouses, railroad boxcars, industrial plants, manufacturing plants, food processing plants only; soil applied perimeter treatment of warehouses, industrial plants, manufacturing plants, food processing plants only.

**Non-Residential Outdoor Control of Wood Infesting Insects [Terrestrial Non-Food]:** Fence posts, utility poles, railroad ties, landscape timbers, logs, pallets, wooden containers, poles, posts, and processed wood products.

**If the product is labeled for reformulation into products bearing labeling for non-agricultural uses (other than termite control), the label must contain the following statements:**

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 Pesticide. All other

end-use products formulated from the product (other than containerized 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 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 baits in child-resistant packaging.
- The end-use 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 or mosquito adulticide use.
- The end-use 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./acre.
  - mosquito adulticide use for public health purposes;
  - individual fire ant mound treatment for public health purposes; and
  - fence posts, utility poles, railroad ties, landscape timbers, logs, pallets, wooden containers, poles, posts, and processed wood products.

#### **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 support of registration excluding any use strictly prohibited by this label.

#### **Experimental Uses**

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

#### **Other 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 products for the following uses:

**Aquatic Uses [Aquatic Food Crop, Aquatic Non-Food]:** Any aquatic use, including mosquito larvicide.

#### **Important Note:**

Because of their properties and intended uses, insecticidal formulations containing this product will require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling based on the properties and intended uses of their own finished formulations, and are responsible for obtaining EPA registration of these products.

### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage and disposal.

**PESTICIDE 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:**

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. 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.

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**WARRANTY—CONDITIONS OF SA**

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.