

19713-597

9/17/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 17 2008

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

Dear Mr. Fonseca:

Subject: Drexel Imitator Herbicide (Revise Aerial Application In CA)
EPA Registration No. 19713-597
Label Submitted August 6, 2008

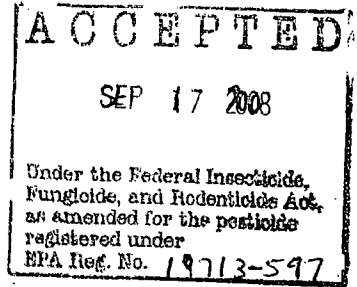
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable. Amended labeling supersedes all previously approved Aerial Application In CA labels. A stamped copy of labeling is enclosed for your records.

Supplemental labeling must be incorporated into master labeling and copies of master labeling submitted for our files at your next printing or within two years from the acceptance of supplemental labeling, whichever comes first. The Agency will consider a convincing argument As to why a supplemental label should not appear on a master label on a case by case basis.

Sincerely,

James A. Tompkins
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

SUPPLEMENTAL LABELING



Imitator[®] Xtra
Herbicide

(EPA Reg. No 19713-597)

FOR AERIAL APPLICATION IN CALIFORNIA

**READ THE ENTIRE DREXEL IMITATOR XTRA LABEL BEFORE PROCEEDING
WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABEL**

KEEP OUT OF REACH OF CHILDREN

CAUTION

DIRECTIONS FOR USE

**It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
This labeling and the EPA registered labeling must be in the possession of the user at time of pesticide application.**

All applicable directions, restrictions and use precautions on Drexel IMITATOR XTRA label(s) are to be followed. This labeling contains supplemental instructions and restrictions for use of this product which may not appear on the Drexel IMITATOR XTRA label. Follow the instructions carefully.

**READ ENTIRE LABEL AND USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS
AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.**

Avoid contact of herbicide with foliage, green stems, exposed non-woody roots or fruit of crops (except as specified for individual Roundup Ready[®] crops), desirable plants and trees, because severe injury or destruction may result.

See "GENERAL INFORMATION" and "MIXING" sections of the label booklet for this product for essential product performance information.

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters.

Aerial Equipment

Avoid drift. Do not apply when winds are gusty or under any other condition which favors drift. Drift may cause damage to any vegetation contacted to which treatment is not intended. To prevent injury to adjacent desirable vegetation, appropriate buffer zones must be maintained.

Use the following guidelines when aerial applications are made near crops or desirable perennial vegetation after bud break and before total leaf drop, and/or near other desirable vegetation or annual crops:

1. Do not apply within 100 feet of all desirable vegetation or crop(s).
2. If wind up to 5 miles per hour is blowing toward desirable vegetation or crop(s), do not apply within 500 feet of the desirable vegetation or crop(s).
3. Winds blowing from 5 to 10 miles per hour toward desirable vegetation or crop(s) may require buffer zones in excess of 500 feet.
4. Do not apply when winds are in excess of 10 miles per hour or when inversion conditions exist.
5. Apply by air only to nonresidential areas.

CROP USES:

Important: Do not exceed the maximum allowable aerial application rate of 64 fluid ounces per acre, which is allowed for specific crops and application timings.

Read and follow the specific labeling instructions for each crop.

Utilize allowable application rates and timing limitations that pertain to your specific cropping system and stage growth.

Aerial applications of this product are allowed in the following situations:

1. In fallow and reduced tillage systems prior to the emergence or transplanting of labeled crops.
2. In Alfalfa and Pasture renovation applications.
3. Over-the-top applications in Corn with the Roundup Ready gene and Cotton with the Roundup Ready gene. Refer to further label instructions for Corn with the Roundup Ready gene and Cotton with the Roundup Ready gene for specific application instructions for over-the-top applications in these crops.
4. Preharvest in Alfalfa, Corn, Cotton, Wheat, Corn with the Roundup Ready gene, and Cotton with the Roundup Ready gene. Refer to the IMITATOR XTRA herbicide label instructions for specific preharvest application instructions for each individual crop.

Do not plant subsequent crops other than those listed in the label booklet for 30 days following application.

When applied as recommended under the conditions described, this product controls annual and perennial weeds listed in the label booklet.

Use the recommended rates of this product in 3 to 15 gallons of water per acre.

When tank mixing this product with 2,4-D for aerial applications, only 2,4-D amine formulations may be used. This tank mixture may be used for fallow and reduced tillage systems and Alfalfa and pasture renovation applications only.

For FRESNO COUNTY, CALIFORNIA ONLY (From February 15 through March 31 only)
the following applies:

Applicable Area

This section only applies to the area contained inside the following boundaries within Fresno County, California:

- North: Fresno County line
- South: Fresno County line
- East: State Highway 99
- West: Fresno County line

General Information

Always read and follow the label directions and precautionary statements for all products used in the aerial application. Observe the following directions to minimize off-site movement during aerial application of this product. Minimization of off-site movement is the responsibility of the grower, Pest Control Advisor and aerial applicator.

Written Recommendations

A written recommendation MUST be submitted by or on behalf of the applicator to the Fresno County Agricultural Commissioner 24 hours prior to the application. This written recommendation MUST state the proximity of surrounding crops, and that conditions of each manufacturer's product label and this label have been satisfied.

Aerial Applicator Training and Equipment

Aerial application of this product is limited to pilots who have successfully completed a Fresno County Agricultural Commissioner and California Department of Pesticide Regulation approved training program for aerial application of herbicides. All aircraft must be inspected, critiqued in flight and certified at a Fresno County Agricultural Commissioner approved fly-in. Test and calibrate spray equipment at intervals sufficient to insure that proper rates of herbicides and adjuvants are being applied during commercial use. Applicator must document such calibrations and testing. Demonstration of performance at Fresno County Agricultural Commissioner approved fly-ins constitutes such documentation, or other written records showing calculations and measurements of flight and spray parameters acceptable to the Fresno County Agricultural Commissioner.

Applications at Night — Do not apply this product by air earlier than 30 minutes prior to sunrise and/or later than 30 minutes after sunset without prior permission from the Fresno County Agricultural Commissioner.

Note: For aerial application from April 1 through February 14, refer to the other sections of this supplemental label.

THIS LABELING MUST BE IN THE POSSESSION OF THE USER AT THE TIME OF PESTICIDE APPLICATION. PLEASE REFER TO CONTAINER LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.



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

Imitator is a registered trademark of Drexel Chemical Company.
Roundup Ready is a registered trademark of Monsanto Company.