



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
REGISTRATION, PESTICIDES AND  
TOXIC SUBSTANCES

JAN 14 2008

Ms. Luz G. Chan  
Registration Manager  
Drexel Chemical Company  
P.O. Box 13327  
Memphis, TN 38133-0327

Re: Submission of Final Printed Label per EPA's Letter Dated November 21, 2007  
EPA Reg No.: 19713-607  
Submission Date: December 5, 2007

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, December 5, 2007, for the product, Drexel Glyphosate 2% RTU. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in cursive script that reads "Sheela D. Halgood".

for Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs



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

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 19713-607	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL GLYPHOSATE 2% RTU	PM# 25/Herbicide 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 <u>11/21/2007</u>
<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.

**NOTIFICATION**

**JAN 14 2008**

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

Submission of label (607SP-1207) as final label. Details are on the cover letter accompanying this submission. The required certification statement is also submitted.  
 Thank you.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input 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 type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
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) (901) 774-4370
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 (Stamped)
2. Signature <i>Luza Chan</i>	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date December 5, 2007	
2007.12.05 14:43:18 -06'00'		

3/6

# NOTIFICATION

JAN 14 2008



# Drexel

# Glyphosate 2% RTU <sup>TM</sup>

Weed and Grass Killer

For Outdoor Residential Use Only

### ACTIVE INGREDIENT:

Glyphosate, isopropylamine salt .....	2.0%
<b>OTHER INGREDIENTS:</b> .....	<b>98.0%</b>
<b>TOTAL:</b> .....	<b>100.0%</b>

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

See **FIRST AID** Below  
**SHAKE WELL BEFORE USING**

EPA Reg. No. 19713-607

EPA Est. No. 19713-

Net Contents: \_\_\_\_\_

### FIRST AID

**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.

**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 or convulsing person.

Call a poison control 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

**CAUTION:** Causes moderate eye irritation. Harmful if absorbed through skin or swallowed. Avoid contact with skin, eyes, or clothing.

#### PERSONAL PROTECTIVE EQUIPMENT(PPE)

Wear long-sleeved shirt, long pants, chemical-resistant gloves and shoes plus socks.

### USER SAFETY RECOMMENDATIONS

**Users should:** 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) 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.

### ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

### GENERAL INFORMATION

GLYPHOSATE 2% RTU is a nonselective systemic herbicide that is absorbed by the plants through its leaves and moves down to the roots killing the plant. Plants yellow and wilt within hours and killed in 1 to 2 weeks period.

This product is strongly bound by the soil and is readily degraded by soil microorganisms, thus, has no soil residual activity.

This product will kill weeds, unwanted grass, vines, brush, and stumps. It controls even difficult-to-kill weeds like Blackberry, Poison ivy, and Poison oak. This product can be applied around fences, trees and shrubs. It can be used on flower beds, mulch or gravel beds, vegetable and herb gardens, on and around driveways, walkways, patios, foundations, and other areas in the yard.

### WEEDS KILLED

Alder	Dogfennel	Mayweed	Spotted Spurge
Artichoke,	Elderberry	Milkweed	Sprangletop
Jerusalem	Elm	Mock Orange	Spurge
Bahiagrass	Evening Primrose	Mouseear	Sumac
Barberry	Fall Panicum	Chickweed	Sunflower
Barnyardgrass	False Dandelion	Multiflora Rose	St. Augustinegrass
Beggarweed	Fennel	Nimblewill	Tansy Mustard
Bentgrass	Fescue Grass	Nutsedge	Tansy Ragwort
Bermudagrass	Fiddleneck	Oak	Texas Panicum
Bittercress	Field Bindweed	Oleander	Thistle
Blackberry	Field Pennycress	Orchardgrass	Timothy
Black Medic	Field Sandbur	Oxalis	Toadflax
Bluegrass	Filaree	Pampasgrass	Torpedograss
Broadleaf Plantain	Florida Pusley	Paspalum spp.	Trailing Lantana
Bromegrass	Foxtail	Pennsylvania	Trumpet creeper
Buckhorn Plantain	Garden Spurge	Smartweed	Tumble Mustard
Buffalograss	Goosegrass	Pennywort	Vaseygrass
Bull Thistle	Green Foxtail	Pigweed	Velvetleaf
Burdock	Guineagrass	Pine	Virginia-creeper
Buttercup	Hemp Sesbania	Plantain	Western Red
Canada Thistle	Henbit	Poison Hemlock	Cedar
Canarygrass	Hickory	Poison Ivy	White Clover
Carpetgrass	Honeysuckle	Poison Oak	Whitetop
Ceanothus spp.	Horsenettle	Prickly Lettuce	Wild Barley
Cherry	Horseradish	Primrose	Wild Blackberry
Chickweed	Horseweed or	Prostrate Spurge	Wild Carrot
Clover	Marestail	Puncturevine	Wild Geranium
Cocklebur	Iceplant	Purple Cudweed	Wild Morningglory
Cogongrass	Ironweed	Purslane	Wild Mustard
Common Groundsel	Johnsongrass	Quack Grass	Wild Oats
Common Mullen	Kikuyugrass	Quaking Aspen	Wild Sweet Potato
Common Ragweed	Knapweed	Ragweed	Willow
Coral-bead	Knawel	Raspberry	Witchgrass
Coyotebrush	Knotweed	Red Clover	Yarrow
Crabgrass	Kudzu	Redroot Pigweed	Yellow Oxalis
Creeping	Lambsquarters	Red Sorrel	Yellow Starthistle
Beggarweed	Lantana	Ryegrass	Zizaniagrass or
Creeping Charlie	London Rocket	Shepherd spurge	Japanese Lawn-
Curly Dock	Lovegrass	Smartweed	grass and many
Dallisgrass	Mallow	Smooth Catsear	other weeds
Dandelion	Manzanita	Smooth Pigweed	
Dewberry	Maple	Sonchistic	

### DIRECTIONS FOR USE

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

### GENERAL USE PRECAUTIONS AND RESTRICTIONS:

Do not apply this product in a way that will contact any persons or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until spray have dried.

**IMPORTANT:** Read the entire Directions for Use, all precautions, and the Conditions of Sale and Warranty before using this product.

Manufactured By:

## Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

**SINCE 1972**

607SP-1207

GLYPHOSATE 2% RTU Page 1 of 2

This product will kill or injure all green vegetation contacted. Avoid herbicide contact with foliage, green stems, exposed non-woody roots or fruit of crops, desirable plants and trees because injury or destruction may result. Do not spray desirable plants or grasses. If desirable plant is accidentally sprayed with this product, immediately rinse off with plenty of water. Apply when wind is calm. This product is not recommended for use as spot weed control in Lawns.

**The following crops may be planted one day after application of this product:**

Artichoke (Jerusalem), Beans (all types), Beet (green), Blackberry, Blueberry, Boysenberry, Broccoli, Brussel sprout, Cabbage (all types), Carrot, Cauliflower, Celery, Chard (Swiss), Chickory, Collards, Currants, Dewberries, Elderberry, Endive, Gooseberry, Horseradish, Huckleberry, Kale, Kohlrabi, Leek, Lentil, Lettuce, Loganberry, Mustard green, Okra, Olanlieberry, Onion, Parsley, Parsnip, Potato, Radish, Rape greens, Raspberry (black, red), Rhubarb, Rutabaga, Spinach, Sweet potato, Turnip, Yam. (Note: If this product is used for controlling weeds around Berries, do not harvest Berries within 14 days of last application.)

**The following crops may be planted 3 days after application:**

Corn, Cucumber, Eggplant, Garlic, Gourd, Melons (all types), Peas (all types), Pepper (all types), Pumpkin, Squash (summer, winter); Tomatillo, Tomato (by seed), Watercress.

Other plants not listed above including transplanted Tomatoes may be planted 30 days after application of this product.

#### APPLICATION PROCEDURES

For best results, apply this product on a sunny day with daytime temperatures above 60°F and when weeds are actively growing.

Use a coarse spray when applying this product.

To avoid contact of this product on desirable plants, shield the plants with a plastic sheet plastic or cardboard.

To kill Vines growing on non-living objects such as fence, poles, tree trunks with mature bark, cut the vines to a height of 3 to 4 feet and spray thoroughly. For vines growing up shrubs or trees with green bark, cut the vines at their base and spray thoroughly.

To kill Brush, cut to the ground if taller than 5 feet and then, spray regrowth.

To kill Stumps, cut the living stump close to the ground. Spray thoroughly immediately all remaining surfaces.

#### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store pesticide in original container in a cool, dry place preferably in a locked storage cabinet out of reach of children. Protect from freezing.

**PESTICIDE DISPOSAL: If Partly Filled:** Call you local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**CONTAINER DISPOSAL: If Empty:** Do not reuse this container. Place in trash or offer for recycling if available.

#### WARRANTY—CONDITIONS OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller to the extent consistent with applicable laws. To the extent consistent with applicable laws, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable laws, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

#### Additional statements that may be used on or attached to the label:

- Ready to use – no mixing
- For non-selective Postemergent Weed Control
- Contains Glyphosate, the same active ingredient used in Roundup®
- Fast acting formula – Starts to work in hours
- Kills weeds and grasses down to the roots
- Rainproof in hours
- Ideal for Vegetable Garden Weed Control
- For use around flower beds, Tree, Shrubs, Fences, Walks, Mulch Beds, Gravel and Driveways
- Single application controls (kills) most weeds
- Ideal for spot treatments on driveways, sidewalks and patios
- Kills grass and weeds around flower beds, trees, shrubs and sidewalks
- Kills over 185 types of weeds (as listed on the label)

Roundup® is a registered trademark of Monsanto.

3/6  
Drexel

Drexel Chemical Company

December 5, 2007

**NOTIFICATION**

JAN 14 2008

*Submission of Final Label per EPA's Letter dd. November 21, 2007*  
DREXEL GLYPHOSATE 2% RTU (EPA Reg. No. 19713-607)

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

*Luza Chan*

LUZ G CHAN

Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327  
Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: [info@drexchem.com](mailto:info@drexchem.com) • [www.DrexChem.com](http://www.DrexChem.com)

SINCE 1972



**Drexel Chemical Company**

4/6

December 5, 2007

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

**Re: Submission of Final Label per EPA's Letter dd. November 21, 2007  
DREXEL GLYPHOSATE 2% RTU (EPA Reg. No. 19713-607)**

Reference is made to the above. Herewith:

1. Completed EPA Form 8570-1
2. One (1) copy of the final label (607SP-1207) revised according to the 11/21/07 EPA letter with the exception of the addition of the Physical and Chemical Hazards statement. Per my telephone conversation with Mr. Erik Kraft (Team 25, EPA) and his email dated December 3, 2007, the addition of this statement is not necessary as it does not apply to our above product.
3. Required certification statement

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 Chan*  
Luz Chan  
Registration Manager

