

19713-607

10/8/2009

1 of 6



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Luz G. Chan
Product Registration
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-9327

OCT 8 2009

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Primary Brand Name Change "Imitator RTU" and Alternate Brand
Name "GLYPHOSATE 2% RTU," General Label Changes, and Directions for Use
EPA Reg. No. 19713-607
Application Dated September 9, 2009

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 09/09/09 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) 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 Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

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

2096

Please read instructions on reverse before completing form.

Form Approved,OMB No. 2070-0060, Approval expires 2-28-95



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 _____	NOTIFICATION OCT - 8 2009
<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 with proposed basic brand name (607SP-0909*) plus label updates. Details are in the cover letter accompanying this submission.
Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
					1
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8 & 12 ozs. 1, 2.5, 5, 10, 15, 30, 55 gal; Bulk; Tote		5. Location of Label Directions <input type="checkbox"/>	
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> 2009.09.09 15:37:13 -05'00'		3. Title REGISTRATION MANAGER			
4. Typed Name LUZ G CHAN		5. Date September 9, 2009			



Drexel Chemical Company

September 9, 2009

Submission of Revised Label by Notification
DREXEL GLYPHOSATE 2% RTU (EPA Reg. No. 19713-607)

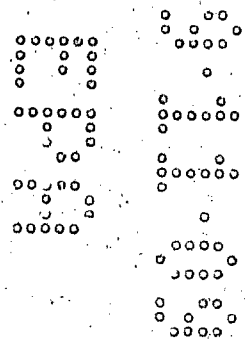
This notification is consistent with the Provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false 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



LUZ G CHAN

Registration Manager



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NOTIFICATION

OCT - 8 2009



Imitator® RTU

Weed and Grass Killer

For Outdoor Residential Use Only

ACTIVE INGREDIENT:

Glyphosate, isopropylamine salt 2.0%

OTHER INGREDIENTS: 98.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-607

EPA Est. No. 19713-XX-XXX

Net Content: _____

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.

USE INFORMATION

IMITATOR 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 are 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
Bahia grass	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	Flaree	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
Burclover	Guineagrass	Pine	Virginia-creeper
Buttercup	Hemp Sesbania	Plantain	Western Red
Canada Thistle	Henbit	Poison Hemlock	Cedar
Canarygrass	Hickory	Poison Ivy	White Clover
Carpentergrass	Honeysuckle	Poison Oak	Whiteweed
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 Mullien	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	Zoysiagrass 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	Sowthistle	

DIRECTIONS FOR USE

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

USE PRECAUTIONS AND RESTRICTIONS

Do not apply this product in a way that will contact any persons or pets, 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 sprays 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

WOLF

This product will kill or injure all green vegetation contacted. Avoid herbicide contact with foliage, green stems, exposed non-wood stems 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, Brussels 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, Olallieberry, 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 fences, poles, or 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.

WARRANTY—CONDITIONS OF SALE

OUR DIRECTIONS 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 law, 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 law, 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
- Ready to use
- Clean up: Walkways, driveways, flower beds
- For non-selective Postemergent Weed Control
- Contains Glyphosate, the same active ingredient used in Roundup®
- Fast acting formula – Starts to work in hours
- Fast acting formula — Even kills the roots
- 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)

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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

Nonrefillable Container (rigid material; less than 5 gallons): 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 and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. 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.

Nonrefillable Container (rigid material; 5 gallons or greater): 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. 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.

Refillable Containers:

Refillable container. Refill this container with this 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 contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

For Residential/Household Use:

PESTICIDE DISPOSAL: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. If empty, place in trash or offer for recycling if available. If partially filled, call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

