



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 26, 2016

Luz Chan  
Registration Manager  
Drexel Chemical Company  
P.O. Box 13327  
Memphis, TN 38113

Subject: Notification per PRN 98-10 – Deleting an advisory statement etc.  
Product Name: Imitator RTU  
EPA Registration Number: 19713-607  
Application Date: February 5, 2016  
Decision Number: 514147

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records. Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false 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) list 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.

If you have any questions, you may contact Shanta Adeeb at 703-347-0502 or via email at [adeeb.shanta@epa.gov](mailto:adeeb.shanta@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Shanta Adeeb" with a small flourish underneath.

Reuben Baris, Product Manager 25  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

# NOTIFICATION

19713-607

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/26/2016

# Drexel

# Imitator® RTU

## 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

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. **You may also call CHEMTREC at 800-424-9300 for emergency medical treatment information.**

### 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 non-selective 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 CONTROLLED

Alder	False Dandelion	Orchardgrass
Artichoke, Jerusalem	Fennel	Oxalis
Bahiagrass	Fescue Grass	Pampasgrass
Barberry	Fiddleneck	<i>Paspalum</i> spp.
Barnyardgrass	Field Bindweed	Pennsylvania
Beggarweed	Field Pennycress	Smartweed
Bentgrass	Field Sandbur	Pennywort
Bermudagrass	Filaree	Pigweed
Bittercress	Florida Pusley	Pine
Blackberry	Foxtail	Plantain
Black Medic	Garden Spurge	Poison Hemlock
Bluegrass	Goosegrass	Poison Ivy
Broadleaf Plantain	Green Foxtail	Poison Oak
Bromegrass	Guineagrass	Prickly Lettuce
Buckhorn Plantain	Hemp Sesbania	Primrose
Buffalograss	Henbit	Prostrate Spurge
Bull Thistle	Hickory	Puncturevine
Burclover	Honeysuckle	Purple Cudweed
Buttercup	Horsenettle	Purslane
Canada Thistle	Horseradish	Quack Grass
Canarygrass	Horseweed or	Quaking Aspen
Carpetgrass	Marestail	Ragweed
<i>Ceanothus</i> spp.	Iceplant	Raspberry
Cherry	Ironweed	Red Clover
Chickweed	Johnsongrass	Redroot Pigweed
Clover	Kikuyugrass	Red Sorrel
Cocklebur	Knapweed	Ryegrass
Cogongrass	Knawel	Shepherdspurse
Common Groundsel	Knotweed	Smartweed
Common Mullen	Kudzu	Smooth Catsear
Common Ragweed	Lambsquarters	Smooth Pigweed
Coral-bead	Lantana	Sowthistle
Coyotebrush	London Rocket	Spotted Spurge
Crabgrass	Lovegrass	Sprangletop
Creeping	Mallow	Spurge
Beggarweed	Manzanita	Sumac
Creeping Charlie	Maple	Sunflower
Curly Dock	Mayweed	St. Augustinegrass
Dallisgrass	Milkweed	Tansy Mustard
Dandelion	Mock Orange	Tansy Ragwort
Dewberry	Mouseear Chickweed	Texas Panicum
Dogfennel	Multiflora Rose	Thistle
Elderberry	Nimblewill	Timothy
Elm	Nutsedge	Toadflax
Evening Primrose	Oak	Torpedograss
Fall Panicum	Oleander	Trailing Lantana

(Continued)

Manufactured By:

## Drexel Chemical Company

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

**SINCE 1972**

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WEEDS CONTROLLED (Cont.)		
Trumpet creeper	Wild Blackberry	Yarrow
Tumble Mustard	Wild Carrot	Yellow Oxalis
Vaseygrass	Wild Geranium	Yellow Starthistle
Velvetleaf	Wild Morningglory	Zoysiagrass or
Virginiacreeper	Wild Mustard	Japanese
Western Red Cedar	Wild Oats	Lawnglass and
White Clover	Wild Sweet Potato	many other weeds
Whitetop	Willow	
Wild Barley	Witchgrass	

### 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.

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, 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.

### 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. (Continued)

### STORAGE AND DISPOSAL (Cont.)

**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 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.

### 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 Post-emergent 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)