

19713-612 5.23.2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 23 2008

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

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request First Aid Statement Changes
EPA Reg. No. 19713-612
Application Dated March 13, 2008

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 03/13/08 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 "L. Arrington".

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



Drexel Chemical Company

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March 13, 2008

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. 2/21/2008
DREXEL GLYPHOSATE K 2% RTU (EPA Reg. No. 19713-612)**

Reference is made to the above. Herewith:

1. Completed EPA Form 8570-1
2. One (1) copy of the final label (612SP-0308) revised to incorporate EPA's comments. Also, the following changes were made:
 - i) In the First Aid box, the words "Emergency phone numbers" was deleted. Instead, Drexel's standard label format which complies with PR Notice 2001-1 was followed.
 - ii) The heading 'Personal Protective Equipment (PPE)' was added.
 - iii) Under 'User Safety Recommendations', the statement was corrected to read "Wash thoroughly.....chewing gum."
 - iv) The heading "Information" was added.
 - v) The Storage and Disposal statements were revised to meet EPA's current requirements.
 - vi) The Warranty statement was revised to Drexel's standard warranty statement.

I highlighted the changes for easy reference.

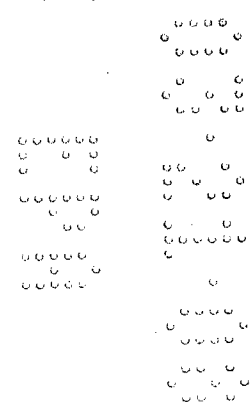
3. Required certification statement

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

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz G Chan
Registration Manager



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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 19713-612	2. EPA Product Manager JIM TOMPKINS	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL GLYPHOSATE K 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>2/21/2008</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.

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

Submission of 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
* 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> 2008.03.13 12:02:53 -05'00'	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date March 13, 2008	

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Drexel

Glyphosate K 2% RTU

Weed and Grass Killer

For outdoor residential use only.

ACTIVE INGREDIENT:

Glyphosate, potassium salt 2.0%

OTHER INGREDIENTS: 98.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

See **FIRST AID** Below

SHAKE WELL BEFORE USING

EPA Reg. No. 19713-612

EPA Est. No. 19713-TN-003

Net Contents: _____

FIRST AID	
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • 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. • 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 Information Center at 1-800-858-7378.	

PRECAUTIONARY STATEMENTS	
Hazards To Humans and Domestic Animals	
CAUTION: Harmful if inhaled. Avoid contact with skin, eyes or clothing. Causes moderate eye irritation. Avoid breathing spray mist.	
PERSONAL PROTECTIVE EQUIPMENT (PPE)	
Wear long-sleeved shirt and long pants, shoes, socks, and chemical-resistant gloves.	

USER SAFETY RECOMMENDATIONS	
Users should: Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking and chewing gum.	

ENVIRONMENTAL HAZARDS
Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters and/or rinsate.

INFORMATION
GLYPHOSATE K 2% RTU is a fast-acting and ready-to-use weed killer (requires no mixing). Kills tough weeds in 1 to 2 weeks, roots and all. Will not build up in the soil to hurt desirable plants growing nearby.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL BEFORE USING. USE ONLY IN ACCORDANCE WITH LABEL INSTRUCTIONS.

KILLS:	Weeds, Grasses, Vines, Brush and Stumps
WHERE TO USE:	As a spot treatment along (around) walkways, fences, driveways, gravel & mulch beds, and patios. Around Flowers, Shrubs and Trees. In Flower beds, Vegetable and Herb gardens. Along fences and foundations. Other areas in your yard.
WHEN TO USE:	When weeds are actively growing. For best results, apply on sunny days with daytime temperatures above 60°F. Apply only when air is calm. Reapply if it rains within 2 hours after application.

USE PRECAUTIONS

GLYPHOSATE K 2% RTU will kill or injure all green vegetations contacted. Do not spray desirable plants or grasses—they will die too. If a desirable plant is accidentally sprayed, immediately rinse it off with plenty of water. Apply when wind is calm. To avoid tracking this product onto desirable plants, keep people and pets off treated areas until spray has dried.

This product is not recommended for spot weed control in lawns since it also kills lawn grasses. To control these weeds without harming the lawn, use a selective herbicide.

HOW TO APPLY

Shake well before use. Adjust nozzle to a coarse spray. Position sprayer tip approximately 1 to 2 feet away from the weeds to be killed. Spray the weeds or grasses you want to kill until thoroughly wet but not dripping. Use a sheet of cardboard or plastic to protect desirable plants from contact with this product.

To kill vines: For vines growing up non-living objects, such as poles and fences, or tree trunks with mature bark, cut the vines to a height of 3 to 4 feet and spray thoroughly. For vines up shrubs or trees with green bark, cut the vines at their base and spray thoroughly. To kill kudzu, apply in mid- to late-Summer when vines are mature and actively growing.

To kill brush taller than 5 feet, cut to the ground and spray regrowth.

To kill stumps, cut living stump close to the ground, then immediately spray all remaining surfaces thoroughly.

For Lawn Replacement: Skip one mowing before spraying. If soil is dry, water before application, and 2 to 3 days after application. Wait 7 days after last application to rake, till, or replant with seed or sod.

To kill Wild caneberries (Blackberry, Raspberry, etc.): Spray any time plants are actively growing. Dead canes should be cut down and removed. Reapplication is often required to kill deep roots.

To kill Poison ivy, Poison oak, or Poison sumac: Be very careful: not to touch living plants. Contact with these plants anytime of the year can cause an allergic reaction. Spray any time plants are actively growing, but at least 4 weeks before the first killing frost in the Fall. Reapply if new growth appears.

For Flowerbed and Garden Preparation: If soil is dry, water before application, and 2 to 3 days after application. Apply evenly over treatment area. Wait at least 1 day before planting.

Do not irrigate treated area immediately after application. Rain or watering 2 hours or more after application will not wash away effectiveness.



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

WHEN TO REPLANT

All ornamental flowers, trees, and shrubs, as well as the following berries, fruits, vegetables, and herbs may be planted 1 day after application: Artichoke (Jerusalem), Beans (all), Beet greens, Blackberry, Blueberry, Boysenberry, Broccoli, Brussels sprout, Cabbage (all), Carrot, Cauliflower, Celery, Chicory, Collards, Currant, Dewberry, Elderberry, Endive, Gooseberry, Horseradish, Huckleberry, Kale, Kohlrabi, Leek, Lentil, Lettuce, Loganberry, Mustard greens, Okra, Orialieberry, Onion, Parsley, Parsnip, Potato, Radish, Rape greens, Raspberry (black and red), Rhubarb, Rutabaga, Spinach, Sweet potato, Swiss chard, Turnip, Yams.

These fruits, vegetables and herbs, may be planted 3 days after application: Corn, Cucumber, Eggplant, Garlic, Gourds, Melons (all), Peas (all), Peppers (all), Pumpkin, Squash (Summer and Winter), Tomatillo, Tomato (by seed), Watercress.

Tomatoes from transplants and fruits, berries, vegetables, and herbs not listed above may be planted 30 days after application.

Lawn grasses may be planted 7 days after application.

WHEN TO HARVEST

If used to control weeds around fruits or nuts, wait the following number of days before harvesting:

- Citrus (Citron, Grapefruit, Kumquat, Lemon, Lime, Mandarin, Orange, Pummelo, Tangelo, Tangerine), Guava, Papaya – 1 day.
- Nuts (Almond, Beechnut, Brazil nut, Butternut, Cashew, Chestnut, Filbert, Hazelnut, Hickory nut, Macadamia, Pecan, Pistachio, Walnut) – 3 days.
- Apple, Avocado, Banana (Plantains), Berries (except Cranberries), Dates, Figs, Grapes, Loquat, Passionfruit, Pear, Persimmon, Pomegranate and Quince – 14 days.
- Apricot, Cherries, Nectarine, Olives, Peach, Plum and Prunes – 17 days.

WEEDS KILLED

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

(Continued)

Wild Morningglory	Willow	Yellow Starthistle
Wild Mustard	Witchgrass	Zoysiagrass
Wild Oats	Yarrow	(Japanese Lawngress)
Wild Sweet Potato	Yellow Oxalis	

STORAGE AND DISPOSAL

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

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

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

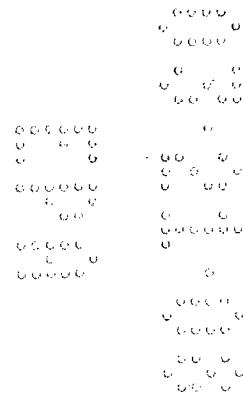
CONTAINER DISPOSAL: If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

Important: It is best to use the entire product in accordance with label directions. If it is necessary to dispose of unused product, please call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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 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.



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Drexel

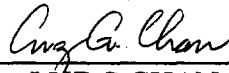
Drexel Chemical Company

March 13, 2008

Submission of Final Label per EPA's Letter dd. February 21, 2008
DREXEL GLYPHOSATE K 2% RTU (EPA Reg. No. 19713-612)

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