

19713-612

7/15/2010

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Luz G. Chan  
Registration Manager  
Drexel Chemical Company  
1700 Channel Avenue  
P.O. Box 13327  
Memphis, TN 38113-0327

JUL 15 2010

Subject: Application for Pesticide Notification (PR Notice 98-10 and PR Notice 2007-4)  
Action: Minor Label  
EPA Registration Number: 19713-612  
Product: Drexel Glyphosate K 2% RTU  
Decision Number: 435164

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated June 3, 2010 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and PRN 2007-4 and finds that the action(s) requested fall within the scope of PRN 98-10 and PRN 2007-4. 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 703-305-1243.

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague".

Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)



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

Registration  
 Amendment  
 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**

Amendment - Explain below.  Final printed labels in response to Agency letter dated \_\_\_\_\_

Resubmission in response to Agency letter dated \_\_\_\_\_  "Me Too" Application.

Notification - Explain below.  Other - Explain below.

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

Submission of updated label.

**Section - III**

1. Material This Product Will Be Packaged In:

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	2. Type of Container <input type="checkbox"/> Metal <input checked="" 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  
 Label  Container

4. Size(s) Retail Container  
less than 5 gallons; 5 gallons or greater

5. Location of Label Directions  
 \_\_\_\_\_ **On the label**

6. Manner in Which Label is Affixed to Product  
 Lithograph Paper glued Stenciled  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
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**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.

2. Signature 	3. Title REGISTRATION MANAGER	6. Date Application Received (Stamped)
4. Typed Name LUZ G CHAN	5. Date June 3, 2010	



**Drexel Chemical Company**

Mh  
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June 3, 2010

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 Revised Label per PR Notice 98-10 and PR Notice 2007-4  
DREXEL GLYPHOSATE K 2% RTU (EPA Reg. No. 19713-612)**

Herewith:

1. Completed EPA Form 8570-1
2. Two copies (marked and unmarked) of the label (612SP-0110\*) with the following revisions:
  - i) Under Refillable Containers, "this product" was changed to "pesticide".
  - ii) "Shake Well Before Using" / "Recirculate Contents Before Use" was deleted as this product is a true solution. Also, under the section "How to Apply", the sentence "Shake well before use." was deleted.

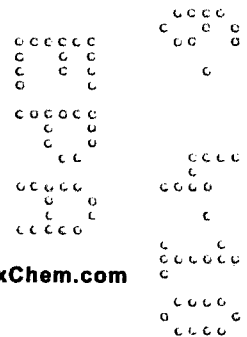
The changes were highlighted for easy reference.

3. Certification statements

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 G. Chan*  
Luz G Chan  
Registration Manager



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NOTIFICATION

JUL 15 2010



# 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

EPA Reg. No. 19713-612

EPA Est. No. 19713-XX-XXX

Net Content: \_\_\_\_\_

FIRST AID	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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	
<b>CAUTION:</b> Harmful if inhaled. Avoid contact with skin, eyes or clothing. Causes moderate eye irritation. Avoid breathing spray mist.	
<b>PERSONAL PROTECTIVE EQUIPMENT (PPE)</b> Wear long-sleeved shirt and long pants, shoes, socks, and chemical-resistant gloves.	

USER SAFETY RECOMMENDATIONS	
<b>Users should:</b> Remove and wash contaminated clothing/PPE 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.**

<b>KILLS:</b>	Weeds, Grasses, Vines, Brush and Stumps
<b>WHERE TO USE:</b>	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.
<b>WHEN TO USE:</b>	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**

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.



Manufactured By:  
**Drexel Chemical Company**  
 P.O. BOX 13327, MEMPHIS, TN 38113-6327  
**SINCE 1972**

The Drexel logo is a registered trademark of Drexel Chemical Company.

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.

**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, Olallieberry, 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	Canarygrass	Dogfennel
Artichoke, Jerusalem	Carpentergrass	Elderberry
Bahiagrass	Ceanothus spp.	Elm
Barberry	Cherry	Evening Primrose
Barnyardgrass	Chickweed	Fall Panicum
Beggarweed	Clover	False Dandelion
Bentgrass	Cocklebur	Fennel
Bermudagrass	Cogongrass	Fescue Grass
Bittercress	Common	Fiddleneck
Blackberry	Groundsel	Field Bindweed
Black Medic	Common Mullien	Field Pennycress
Bluegrass	Common	Field Sandbur
Broadleaf Plantain	Ragweed	Filaree
Bromegrass	Coral-bead	Florida Pusley
Buckhorn Plantain	Coyotebrush	Foxtail
Buffalograss	Creeping Grass	Garden Spurge
Bull Thistle	Creeping Charlie	Goosegrass
Burclover	Curly Dock	Green Foxtail
Buttercup	Dallisgrass	Guineagrass
Canada Thistle	Dandelion	Hemp Sesbania
	Dewberry	Henbit
		Hickory
		Honeysuckle

(Continued)

**WEEDS KILLED (Continued)**

Horsenettle	Pennywort	Texas Panicum
Horseradish	Pigweed	Thistle
Horseweed or Maretail	Pine	Timothy
Iceplant	Plantain	Toadflax
Ironweed	Poison Hemlock	Torpedograss
Johnsongrass	Poison Ivy	Trailing Lantana
Kikuyugrass	Poison Oak	Trumpet creeper
Knawweed	Prickly Lettuce	Tumble Mustard
Knawel	Primrose	Vaseygrass
Knotweed	Prostrate Spurge	Velvetleaf
Kudzu	Puncturevine	Virginicreeper
Lambsquarters	Purple Cudweed	Western Red Cedar
Lantana	Purslane	White Clover
London Rocket	Quackgrass	Whiteweed
Lovegrass	Quaking Aspen	Whiteton
Mallow	Ragweed	Wild Barley
Manzanita	Raspberry	Wild Blackberry
Maple	Red Clover	Wild Carrot
Mayweed	Redroot Pigweed	Wild Geranium
Milkweed	Red Sorrel	Wild Morningglory
Mock Orange	Ryegrass	Wild Mustard
Mouseear	Shepherdspurse	Wild Oats
Chickweed	Smartweed	Wild Sweet Potato
Multiflora Rose	Smooth Catsear	Willow
Nimblewill	Smooth Pigweed	Witchgrass
Nutsedge	Sowthistle	Yarrow
Oak	Spotted Spurge	Yellow Oxalis
Oleander	Sprangletop	Yellow Starthistle
Orchardgrass	Spurge	Zoysiagrass (Japanese Lawngress)
Oxalis	Sumac	
Pampasgrass	Sunflower	
Paspalum spp.	St. Augustine -grass	
Pennsylvania Smartweed	Tansy Mustard	
	Tansy Ragwort	

**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:** 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 pesticide only. Do not reuse this container for any other purpose. Cleaning the container  
 (Continued)

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### STORAGE AND DISPOSAL (Cont.)

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.

