

19713-616

2/5/2010

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

FEB 5 2010

Subject: Label Notification(s) for Pesticide Registration Notice 98-10 and 2007-4
1. Updated trademark ownership statement

Dear Ms. Chan:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 and 2007-4 dated December 31, 2009 for:

EPA Registration 19713-616 Drexel Imitator 62% MUP

The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98-10 and 2007-4 and finds that the label changes requested falls within the scope of PR Notice 98-10 and 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Nicole Williams of my staff at 703-308-5551.

Sincerely,

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 19713-616	2. EPA Product Manager Jim Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL IMITATOR 62% MUP	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>2/24/2010</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
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label. Details are in the cover letter accompanying this submission.

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	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 30, 55 Gal; Bulk, Tote		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" 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  2010.02.02 10:39:29 -06'00'	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date February 2, 2010	



Drexel Chemical Company

December 31, 2009

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 by Notification
DREXEL IMITATOR 62% MUP (EPA Reg. No. 19713-616)**

This submission replaces Drexel's notification submission dated March 3, 2009.

Herewith:

1. Completed EPA Form 8570-1
2. One (1) copy of the label (616SP-1209*) with the following revisions according to the EPA Stamped Accepted label dated February 24, 2009 (copy enclosed for your reference):
 - i) The EPA Reg. No. 19713-616 was added.
 - ii) The Container Disposal statements were updated.

Also, the following revisions were made:

- i) "Shake Well Before Using" was deleted as it is unnecessary. The above product is a true solution.
- ii) The trade mark ownership statement was updated.

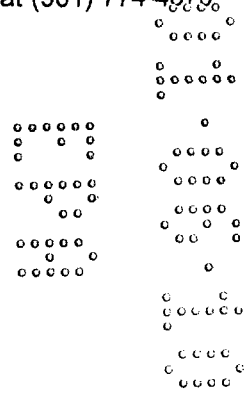
3. Certification Statement

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
Luz G Chan
Registration Manager



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Drexel Chemical Company

December 31, 2009

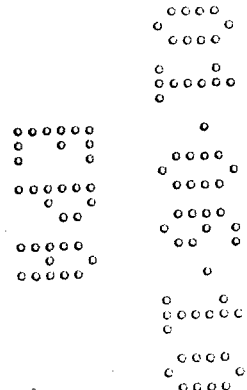
Submission of Revised Label per PR Notice 2007-4
DREXEL IMITATOR 62% MUP (EPA Reg. No. 19713-616)

This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA Regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. 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 requirements of 40 CFR 156.10, 156.140, 156.144, and 156.146 and 156.156, 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





Drexel Chemical Company

December 31, 2009

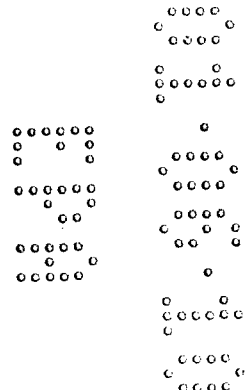
Submission of Revised Label by Notification
DREXEL IMITATOR 62% MUP (EPA Reg. No. 19713-616)

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

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Imitator[®] 62% MUP

For Manufacturing and Formulating Use Only

ACTIVE INGREDIENT:

Glyphosate: N-(phosphonomethyl) glycine,
in the form of its isopropylamine salt 62.0%

OTHER INGREDIENTS: 38.0%

TOTAL: 100.0%

Contains 769 grams per liter or 6.42 pounds per U.S. gallon of the active ingredient glyphosate in the form of its isopropylamine salt. Equivalent to 570 grams per liter or 4.75 pounds per U.S. gallon of the acid glyphosate.

This product may only be reformulated or repackaged into a herbicide for use in aquatic, industrial, turf, ornamental nursery, tree and forestry, including eucalyptus and Christmas trees, and residential sites; fallow land and fallow bed; or some or all of the following food cropping systems; root, bulb, and tuber vegetables, leafy vegetables, brassica and cucurbit vegetables, succulent and dried legume vegetables, fruiting vegetables, fruits (citrus, pome, stone, various tropical fruits, small fruits and berries), tree nuts, cereal grains, animal grasses and forages, herbs, spices, and food crops including asparagus, avocado, banana, canola, coffee, cotton, coconut, cranberry, dates, flax, grapes, kiwi, lychee, mints, olive, palms, peanut, pineapple, soybeans, strawberry, sugar beet, sugarcane, and tea.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No.19713-616

EPA Est. No.19713-XX-XXX

Net Content: _____

FIRST AID
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

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination Systems (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State water board or regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Solutions of this product should be mixed, stored and used only in stainless steel, aluminum, fiberglass, plastic, or plastic-lined containers. DO NOT mix, store, or utilize this product or solutions of this product in galvanized steel or unlined steel (except stainless steel) containers or tanks. This product or solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas could flash or explode, causing serious personal injury, if ignited by open flame, spark, lighted cigarette, welder's torch or other ignition source. In case of spill or leak, soak up and remove to a landfill.

DIRECTIONS FOR USE

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

Use only for manufacturing and formulating herbicides through dilution and blending.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store above 32°F (0°C) to keep from crystalizing. Crystals will settle to the bottom. If allowed to crystallize, warm to 68°F (20°C) and mix well or recirculate to redissolve before using.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state or local procedures.

CONTAINER DISPOSAL:

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 a mix tank. Fill 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 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.



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

SINCE 1972

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WARRANTY—CONDITIONS OF SALE

Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the "DIRECTIONS FOR USE".

To the extent consistent with applicable law, Manufacturer makes no other warranties, expressed or implied, including FITNESS or MERCHANTABILITY. 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. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

IMITATOR and the DREXEL logo are registered trademarks of Drexel Chemical Company.

