



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 27, 2020

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

Subject: Label Amendment – Add uses based on use sites listed on the label for the technical material
Product Name: Drexel Imitator 62% MUP
EPA Registration Number: 19713-616
Application Date: June 03, 2019
Decision Number: 552034

Dear Ms. Chan:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.


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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Theresa Gerber at 703-347-8583 or by email at gerber.theresa@epa.gov.

Sincerely,



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

Enclosure



ACCEPTED

5/27/2020

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 19713-616

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%

This product 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.

KEEP OUT OF REACH OF CHILDREN CAUTION

(See FIRST AID BELOW)
(See Side (Back) Panel for FIRST AID)

EPA Reg. No. 19713-616
 EPA Est. No. XXXXX-XX-X Net Content: _____ Gals. (_____ L)

FIRST AID
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.

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

616SP-0520*P

<p style="text-align: center;">PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals CAUTION</p>

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 System (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, 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.

This product may only be formulated or repackaged into a herbicide for use in the following:

- Crop Groups 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19; acerola; aloe vera; ambarella; asparagus; atemoya; avocado; bamboo; banana; betelnut; biriba; blimbe; breadfruit; buffalo gourd; cacao (cocoa) bean; cactus; canistel; canola; carambola (starfruit); chaya; cherimoya; coconut; coffee; cotton; cranberry; custard apple; dates; dokudami; durian; epazote; feijoa; figs; flax; galangai; globe artichoke; Govenor's plum; gow kee; grapes; (raisin, table, wine); guava; hops; ilama; imbe; imbu; jaboticaba; jackfruit; jojoba; juneberry; kava; kenaf; kiwi; lesquerella; leucaena; ligonberry; longan; lychee; mamey apple; mango; mangosteen; marmaladebox (genip); meadowfoam; mioga; mountain papaya; mustard; noni (Indian mulberry); okra; olive; oregano; palm; papaya; passionfruit; pasture grasses pawpaw; peanut; pepper leaf; peppermint; perilla; persimmon; pine nut; pineapple; pistachio; plantain; pomegranate; pulasan; quinoa; rambutan; rape; rose apple; safflower; salai; sapodilla; sapote (black, mamey, white); sesame; sorghum (milo); soursop; soybean; Spanish lime; spearmint; star apple; stevia; strawberry; sugar apple; sugarbeet; sugarcane; sunflower; Surinam cherry; tamarind; tea; teff; ti; ugli fruit; wasabi; water spinach; watercress; wax jambu; yacon.
- Glyphosate-tolerant crops: Alfalfa; Canola (Spring and Winter varieties); Corn; Corn Hybrids; Cotton; Flex Cotton; Soybeans; Sugar beets.
- Non-crop uses: Bermudagrass release; broadcast and spot weed control; chemical mowing; cut stump application; hollow stem injection; injection and frill; trim-and edge; turfgrass renovation; site preparation; and other uses in, on or around the following sites: airports, apartment complexes; aquatic sites; commercial sites; construction sites; CRP land; ditch banks; dormant turfgrass; driveways; farmsteads; fencerows; forestry; golf courses; industrial sites; landscape areas; lumber yards; non-food tree, shrub, vine, and ornamentals production sites; nurseries; parking areas; parks; recreational and public areas; pastures; rangelands; residential sites; railroads; rights-of-way; roadsides; schools; sports complexes; turf and grass seed production; utility sites; wildlife food plots; woody brush and trees; and other related sites.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed 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 must be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state or local procedures.

CONTAINER HANDLING:

Nonrefillable Container (rigid material; > 5 gallons up to < 250 gallons): Nonrefillable container. Do not reuse or refill this container. 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. Offer for recycling, if available, or dispose of empty container in a sanitary landfill or by or by other procedures allowed by state and local authorities.

Refillable Container (≥ 250 gallons & Bulk): 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. Offer for recycling, if available, or dispose of empty container in a sanitary landfill or by or by other procedures allowed by state and local authorities.

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.

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