

19713-628

2/27/2014

1/15



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

FEB 27 2014

Subject: Notification; Per PR-Notice 98-10
Drexel Imitator 25% Concentrate Weed & Grass Killer
EPA Reg. No. 19713-628
Date Submitted: February 20, 2014

Dear Ms. Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated February 20, 2014 for the product referenced above. 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.

If you have any questions regarding this letter, please contact me at (703) 306-0415 or davis.kable@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", enclosed within a large, loopy oval scribble.

Kable Bo Davis
Product Manager 25
Herbicide Branch
Registration Division (7505P)

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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 19713-628	2. EPA Product Manager Bo Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL IMITATOR 25% CONCENTRATE	PM# 25	
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 type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION FEB 27 2014
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated 2/19/2014	<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 revised label to change the basic brand name to Drexel Imitator 25% Concentrate Weed & Grass Killer plus others. Details are in the cover letter accompanying this submission.
 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.

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 gals; 5 gals. and 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 February 20, 2014	

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Drexel Chemical Company

February 20, 2014

NOTIFICATION

FEB 27 2014

Document Processing Desk (NOTIF)
ATTN: MR. BO DAVIS, PM 25
OPP (7504P), U.S. EPA
2777 Crystal Drive
Rm. S-4900, One Potomac Yard
Arlington, VA 22202

**Re: Submission of Revised Basic Brand Name plus Other Label Changes per EPA's 02/19/2014 Letter
DREXEL IMITATOR 25% CONCENTRATE (EPA Reg. No. 19713-628)**

Dear Mr. Davis,

Reference is made to your letter dated February 19, 2014. Please find:

1. Completed EPA Form 8570-1
2. Two copies (marked and clean) of the label with the revised brand name to **"Drexel Imitator 25% Concentrate Weed & Grass Killer"**.

On page 8, we have reinstated the section heading to read "How to Refill Imitator Ready-to-Use Containers". We have added the word "an" to the statements appearing under this section for better reading.

Also, we have added the following optional marketing statements:

- Cleanup: Walkways . Driveways . Flowerbeds
- Contains glyphosate - The same active ingredient used in Roundup®
- Fast acting fomula - Even Kills the roots!
- Makes over 10 gallons of solution for easy-to-kill weeds and over 5 gallons of solution for tough or established weeds.

If you have any questions regarding this submission, please contact me 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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NOTIFICATION

FEB 27 2014



IMITATOR® 25% CONCENTRATE
Weed & Grass Killer

For Residential and Institutional Use Only and for Applications in Noncrop and Wetland Areas as listed on the label.

ACTIVE INGREDIENT:

Glyphosate in the form of its isopropylamine salt..... 25.0%

OTHER INGREDIENTS: 75.0%

TOTAL: 100.0%

CAUTION

KEEP OUT OF REACH OF CHILDREN

See First Aid Below

EPA Reg. No. 19713-628
EPA Est. No. 19713-TN-3

Net Content: _____

FIRST AID	
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.
<p>Have the 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.</p>	

Manufactured By:



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

628SP-0214*

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

DIRECTIONS FOR USE

Read the Entire Label Before Using this Product.

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. People and pets may enter treated areas after spray has dried.

Apply with plastic or stainless steel tank-type sprayer. DO NOT apply with galvanized or unlined steel (except stainless steel) sprayer or through any irrigation system.

NOTICE: ALL VEGETATION CONTACTED BY THIS PRODUCT CAN BE INJURED OR DESTROYED. Make sure this product does not contact desirable lawn, grasses, flowers, vegetables, shrubs or trees and other desirable plants. Do not contact green bark of trees or shrubs. If necessary, use cardboard or plastic to shield plants. If desirable plant is contacted, immediately rinse with water.

MIXING INSTRUCTIONS

FOR TANK SPRAYER (fiberglass, plastic, plastic-lined steel or stainless steel)

- For easy to kill weeds (such as seedlings): Add 3 fl. ozs. (6 tbsps.) of this product to 1 gallon of water.
- For tough, established weeds / For best results: Add 6 fl. ozs. (12 tbsps.) of this product to 1 gallon of water.
- Spot treat or spray evenly over 300 sq. ft.

Clean sprayer and all sprayer parts after use by rinsing at least three times with water. Spray rinse water on gravel or bare soil. Sprayer may be used for other products once cleaned.

FOR DIAL TYPE HOSE-END SPRAYER

Consider using the Ortho Dial'n Spray®

1. Set the dial to 6 fl. ozs.
2. To sprayer jar, add 6 fl. ozs. of this product (12 tbsps.) for each 300 sq. ft. DO NOT add water.
3. Evenly spray over measured area.
4. Pour back unused product into its original container after spraying.

FOR CONCENTRATE PLUS WATER (HOSE-END) TYPE SPRAYER

1. Determine the amount of this product required.
2. Pour the amount of this product into sprayer jar to the required "fl. oz." level.
3. Add the required amount of water to the "gals." level.
4. Replace sprayer top on jar and apply.

FOR IMITATOR PULL N' SPRAY

- Add entire contents of 13 fl. ozs. of this product to the empty Imitator Pull N' Spray container and fill with water.

1 fl. oz. = 2 tablespoonful; 1 tablespoonful = 3 teaspoonful

HOW TO APPLY

1. Spray the target grasses or weeds thoroughly wet.
2. When spot treating grasses or weeds around desirable plants, shield plants from drift with a plastic or cardboard. Rinse off immediately with water if desirable plants are accidentally sprayed.

Note: DO NOT spray plants or grasses that you like as they may also die. This product is not recommended for spot weed control on lawns since lawn grasses will be killed.

WHEN TO APPLY

- Apply when grasses or weeds are growing actively.
- For best results, apply this product during warm, sunny weather (when temperature is above 60°F) to enhance systemic movement from foliage to the roots.
- Apply this product when air is calm to prevent drift to desirable plants.
- Rain or watering 2 hours after application will not wash away its effectiveness.
- Apply when weeds are small and before formation of seeds. Established or tough weeds may require repeat application.

APPLICATION INSTRUCTIONS

To Kill Vines

- If vines are growing up fences, poles, or tree trunks with mature bark, cut vines to a height of 3 to 4 feet and spray thoroughly the vines.
- If vines are climbing shrubs or tree trunks with green bark, cut vines at the base and treat as directed for stumps below or spray regrowth. If regrowth is sprayed, shield shrubs or green bark from spray drift with a plastic or cardboard.

To Kill Stumps

- Cut close to the ground living stump.
- Drive/drill 4 to 5 holes into freshly cut stump.
- Pour immediately undiluted product into the holes.

For Lawn Replacement

Use this product to kill lawn and weeds before planting new lawn.

- Skip one mowing before spraying.
- Use 6 fl. ozs. (12 tbsps.) of this product per gallon of water for each 300 sq. ft.
- If soil is dry, water before application and 2 to 3 days after application.
- Reapply if green patches remain after 7 days.
- Wait 7 days after last application to rake, till or replant with seed or sod.

[Alternate text]

- Wait 7 days for lawn and weeds to die. Repeat if necessary.
- Rake or till to prepare area for planting seed or sod.

For Lawn Renovation

Use this product for replacing worn out lawns.

- Under dry conditions, water lawn every other day for a week before using this product.
- For best results, apply in the Spring or Fall when daytime temperatures are at least 60°F.
- Do not mow for 7 days before and after application.

- After 7 days, prepare the soil for planting by raking or rototilling the lawn. Rake up and remove loosened thatch or debris. Mix in starter fertilizer and other amendments, if needed. Apply seed according to directions in the seed package or install sod. Grass seed must have good contact with soil to germinate.

For Kudzu

- For best results, apply this product in mid to late summer when vines are mature and actively growing.

For Wild Blackberry

- Spray actively growing plants anytime. Dead canes should be cut down and removed. Reapplication is often needed to kill deep roots.

For Poison Ivy and Poison Oak

- Contact with these plants anytime of the year can cause allergic reactions. Spray actively growing plants anytime, but at least 4 weeks prior to first killing frost in the Fall. Reapply if new growth appears. Wear rubber gloves to handle dead plants. Dispose of plants and rubber gloves in tightly sealed garbage bags.

To Prepare Flowerbed and Garden (plot)

Use this product to kill grasses, weeds, and brush before planting flowers, fruits, herbs or vegetables, berries and small fruits, shrubs and trees.

- See "When to Reseed or Replant Sprayed Areas" section of this label for listing of plants that may be planted after spraying this product. Observe the number of days specified before planting.
- If the soil is dry, water before application and 2 to 3 days after application.
- Evenly apply over treatment area.

Spot Spraying / Trim and Edge:

Use this product in and around ornamental trees, flower beds, fruit and nut trees (such as citrus, almonds, beechnut, cashew, chestnut, hazelnut, pecan, pistachio, walnut, apples, avocado, bananas [plantains], berries [such as blackberry, blueberry, boysenberry, cranberry, currant, dewberry, elderberry, gooseberry, huckleberry, loganberry, ollalieberry, raspberries], dates, figs, grapes, kiwi fruit, loquat, passion fruit, pears, persimmon, pomegranate, quince, apricot, cherries, nectarines, olives, peaches, plums, prunes), grapevines, shrubs, fences, driveways and walkways.

Use Precautions and Restrictions:

- Allow the specified number of days in the "When To Harvest" section of this label before harvesting fruits and nuts.
- Do not use for spot weed control in lawns since this product kills all green plants including lawn grass.

General Weed Control:

Use this product along fences, paths, sidewalks, driveways, patios, around ornamental plantings, flower beds, shrubs, trees, around building structures, and in brick and gravel walkways.

- Use to trim and edge landscape areas.
- Do not use for spot weed control in lawns since this product kills all green plants including lawn grass.

WHEN TO RESEED OR REPLANT SPRAYED AREAS

- The following may be planted **1 day** after application of this product:

All ornamental flowers, shrubs, and trees	Currant	Parsley
Artichoke (Jerusalem)	Dewberry	Parsnips
Beans (all)	Elderberry	Potato
Beet greens	Endive	Radish
Blackberry	Gooseberry	Rape greens
Blueberry	Horseradish	Raspberry (black, red)
Boysenberry	Huckleberry	Rhubarb
Broccoli	Kale	Rutabaga
Brussels sprouts	Kohlrabi	Spinach
Cabbage (all)	Leek	Sweet potato
Carrot	Lentils	Turnip
Cauliflower	Lettuce	Yams
Celery	Loganberry	
Chard (Swiss)	Mustard greens	
Chicory	Okra	
Collards	Olallieberry	
Cranberry	Onion	

- The following may be planted **3 days** after application of this product:

Corn	Melons (all)	Tomatillo
Cucumber	Peas (all)	Tomato (by seed)
Eggplant	Peppers (all)	Watercress
Garlic	Pumpkin	
Gourds	Squash (summer, winter)	

- The following may be planted **7 days** after application of this product:

Lawn grasses

- The following may be planted **30 days** after application of this product:

Tomatoes (from transplant)	Unlisted fruits, herbs, and vegetables
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WHEN TO HARVEST

If this product is used to control weeds around fruits or nuts, allow the following number of days before harvesting:

FRUITS AND NUTS	Number of Days After Last Application of this Product
Citrus (citron, grapefruit, lemon, lime, mandarin, orange, tangelo, and tangerine)	1
Nuts (almonds, beechnut, cashew, chestnut, hazelnut, pecan, pistachio, walnut)	3
Apples, Avocado, Bananas (plantains), Berries (except cranberries), Dates, Figs, Grapes, Kiwi fruit, Loquat, Passion fruit, Pears, Persimmon, Pomegranate, Quince	14
Apricot, Cherries, Nectarines, Olives, Peaches, Plums, Prunes	17
Cranberry	30

HOW THIS PRODUCT WORKS

This product enters the plant through the foliage and moves systemically to the roots, killing weeds by stopping the production of a substance found in plants. Any product not absorbed by the plant breaks down into natural materials without moving in or on the soil to untreated plants. Weeds usually will yellow and wilt within 2 to 4 days with complete kill in 1 to 2 weeks.

WEEDS CONTROLLED

Kills all types of weeds, grasses and sedges

Weeds including: Artichoke thistle, Beggarweed, Black medic, Blue mustard, Blue toadflax, Brassbuttons, Broadleaf plantain, Burclover, Buttercup, Canada thistle, Cattail, Chickweed, Cocklebur, Common groundsel, Common mullein, Common plantain, Common ragweed, Creeping beggarweed, Creeping Charlie, Curly dock, Dandelion, Dog fennel, Evening primrose, False dandelion, Fiddleneck, Field bindweed (wild morningglory), Field pennycress, Filaree, Florida pusley, Garden spurge, Henbit, Horsenettle, Horseradish, Horseweed/Marestail, Iceplant, Knapweed, Knotweed, Lambsquarters, Lantana, Little bittercress, London rocket, Mallow, Mayweed, Milkweed, Mouseear chickweed, Narrowleaf (buckhorn) plantain, Nightshade (silverleaf), Oldenlandia, Oxalis, Pennsylvania smartweed, Pennywort, Poison hemlock, Prickly lettuce, Primrose, Prostrate spurge, Puncturevine, Ragweed, Red clover, Redroot pigweed, Sheperdspurge, Smooth catsear, Smooth pigweed, Sowthistle, Spotted spurge, Tansy ragwort, Tansymustard, Teaweed, Trumpet creeper, Tumble mustard, Virginia creeper, White clover, Whitetop, Wild barley, Wild mustard, Wild oats, Wild sweet potato, Yellow starthistle, and other broadleaved weeds.

Grasses including: Annual bluegrass, Annual ryegrass, Bahiagrass, Barnyardgrass, Bentgrass, Bermudagrass, Bromegrass, Cogongrass, Crabgrass, Creeping bentgrass, Dallisgrass, Fall panicum, Fescue, Field sandbur, Foxtail, Goosegrass, Guineagrass, Johnsongrass, Kentucky bluegrass, Kikuyugrass, Lovegrass, Maidencane, Nimblewill, Orchardgrass, Pampas grass, Perennial ryegrass, Quackgrass, Sandspur, Smooth bromegrass, Sprangletop, St. Augustinegrass, Tall fescue, Texas panicum, Timothy, Torpedograss, Vaseygrass, Witchgrass, Zoysia, and other grass weeds.

Sedges: Nutsedge, Purple nutsedge, Yellow nutsedge

Brush (tough weeds), Unwanted Trees, Shrubs and Vines including: Alder, Ash, (quaking) Aspen, Blackberry, Bluegum eucalyptus, Broom (French, Scotch), Buckwheat, Ceanothus, Chamise, Cherry, Coyote brush, Dewberry, Elderberry, Elm, Eucalyptus, Giant reed, Hawthorn, Hazel, Honeysuckle, Kudzu, Locust, Madrone, Maple, Oak, Persimmon, Poison oak, Poison ivy, Poplar, Raspberry, Sage, Sagebrush, Salmonberry, Saltcedar, Sassafras, Sumac, Sweetgum, Tan oak, Thimbleberry, Tree tobacco, Wild rose (multiflora), Willow, and other tough weeds,

APPLICATIONS IN NONCROP AREAS (Such as Forestry, Utility Rights-of-way, Roadsides and similar Industrial or Noncrop Areas)

TREE INJECTION APPLICATIONS:

Apply the equivalent of 2 mL of this product for each 2 inches of trunk diameter. This is best achieved by applying this product either to a continuous frill around the tree or to cuts spaced evenly around the tree below all branches. As tree diameter increases in size, better results are achieved by applying to a continuous frill or more closely spaced cuttings.

Avoid application techniques that allow runoff to occur from frill or cut areas in species that freely exude sap after frilling or cutting. In species like this, make frill or cut at an oblique angle so as to produce a cupping effect. Use undiluted product. For best results, applications should be made during periods of active growth and after full leaf expansion.

CUT STUMP APPLICATIONS:

Woody vegetation may be controlled by treating freshly cut stumps of trees and resprouts with this product using suitable equipment to ensure thorough coverage of the entire cambium. Apply this product undiluted immediately after cutting trees. Delay in applying this product may result in reduced performance. For best results, trees should be cut during periods of active growth and full leaf expansion.

Cut vegetation close to the soil surface. Avoid wash off of product from treated stumps by rainfall or other means within 6 hours of application.

WOODY BRUSH AND TREES CONTROLLED:

When applied as directed under the conditions described, this product will control or partially control most woody brush and tree species, some of which are listed below:

Alder (<i>Alnus</i> spp.)	Maple (<i>Acer</i> spp.)	Sweetgum (<i>Liquidambar styraciflua</i>)
Coyote brush (<i>Baccharis consanguinea</i>)	Oak (<i>Quercus</i> spp.)	Sycamore (<i>Platanus occidentalis</i>)
Dogwood (<i>Cornus</i> spp.)	Poplar (<i>Populus</i> spp.)	Tan oak (<i>Lithocarpus densiflorus</i>)
Eucalyptus (<i>Eucalyptus</i> spp.)	Saltcedar (<i>Tamarix</i> spp.)	Willow (<i>Salix</i> spp.)
Madrone (<i>Arbutus menziesii</i>)		

APPLICATION IN WETLAND SITES

This product may be applied as directed around water and in wetland areas including land adjacent to and surrounding domestic water supply reservoirs, supply streams, lakes and ponds.

Consult local public water control authorities before applying this product around public water. Permits may be required to treat in such areas.

DO NOT apply this product directly to water.

HOW TO REFILL IMITATOR READY-TO-USE CONTAINERS

• **24 fl. ozs. of this product ready-to-use:**

To an empty container, add 1 fl. oz. of this product, then very slowly fill with water to avoid foaming.

• **1 qt. of this product ready-to-use:**

To an empty container, add 1.5 fl. ozs. of this product, then very slowly fill with water to avoid foaming.

• **2 qts. of this product ready-to-use:**

To an empty container, add 3 fl. ozs. of this product, then very slowly fill with water to avoid foaming.

• **1 gal. of this product ready-to-use:**

To an empty container, add 6 fl. ozs. of this product, then very slowly fill with water to avoid foaming.

• **1.33 gals. of this product ready-to-use:**

To an empty container, add 8 fl. ozs. of this product, then very slowly fill with water to avoid foaming.

• **2 gals. of this product ready-to-use:**

To an empty container, add 12 fl. ozs. of this product, then very slowly fill with water to avoid foaming.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep container closed to prevent spills and contamination. Store in original container in cool, dry place.

PESTICIDE DISPOSAL: Wastes resulting from this product may be disposed on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: 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 and Home & Garden 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 directed, 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 the 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 the directions given herewith. 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. All other brand names, product names, or trademarks belong to their respective owners.

[OPTIONAL PRODUCT FACT BOX]

PRODUCT FACTS	
What it Does:	⋮
This product kills all types of grasses and weeds.	⋮
Where to Use:	⋮
(icon outdoors) On patios, driveways, walkways, gravel or mulch beds; around flowers, shrubs or trees; around fruits, vegetables; along fences; in large areas for lawn replacement or for preparation of garden plots; other areas in the yard.	⋮
When to Use:	⋮
Apply during warm, sunny weather (above 60°F) for best results.	⋮
Questions & Comments:	
(phone icon) (computer icon) Call (901) 774-4370 or visit our website at www.drexchem.com .	

[OPTIONAL MARKETING STATEMENTS]

- Absorbed into both broadleaved and grassy weeds
- Absorbed on contact, starts work immediately
- Absorbs on contact, starts working immediately
- Also used for large jobs such as lawn renovation and vegetable and flower garden preparation
- Approved for most (many) lawn and garden uses
- Before [weed graphics] / After [weed graphics]
- Begins absorbing on contact
- Breaks down into natural materials
- Can be used around (small) fruits and vegetables
- Can reseed or sod lawns 7 days after treatment
- Cleanup: Walkways. Driveways. Flowerbeds
- Concentrated for extra value
- Contains glyphosate
- Contains glyphosate - The same active ingredient used in Roundup®
- Controls (hardy) (tough) (hard-to-kill) weeds
- Covers up to 300 sq. ft. per gallon of spray
- Dead weeds guaranteed
- Dead weeds guaranteed or your money back
- Does not have soil activity
- Economical
- Economical concentrate formula
- Easy to apply with an Ortho Dial 'n Spray®, hose-end, tank or (handheld) trigger sprayer
- Eliminates [kills] all common weeds and grasses
- Fast acting
- Fast and [&] complete
- Fast acting formula - Even kills the roots!
- For control that doesn't (won't) wash away 2 hours after application
- For general weed control – kills weeds and grasses in 2 to 4 weeks – roots and all
- Ideal for vegetable garden weed control
- For use [Ideal] [Can be used] [Use in and around] [in] [for] [along] [vegetable gardens] [around small fruits and vegetables] [flower beds] [and] [vegetable gardens] [vegetable garden and weed control] [as listed]

- For use [Ideal] [Can be used] [Use in and around] [in] [for] [along] [around] [fences] [driveways] [walkways] [shrubs] [trees] [ornamentals] [walks] [mulch beds] [gravel] [and] [driveways] [curbs]
- Ideal for vegetable garden weed control
- Improved extra strength formula
- Improved formula, completely kills even the toughest weeds and grasses
- Improved formulation – now rain fast – fast uptake
- Kills almost all (annual and perennial) weeds, grasses and other unwanted plants
- Kills existing weeds only, no residual activity in soil
- Kills more weeds in more places
- Kills the entire plant
- Kills over 100 weeds
- Kills over 175 varieties of broadleaved and grassy weeds [as listed]
- Kills over 175 types of weeds [as listed]
- Kills (to) the root
- Kills the root so weeds don't come back
- Kills the roots so weeds won't grow back
- Kills the roots of (both) broadleaved and grassy weeds
- Kills the weed you see and the root you don't
- Kills unwanted weeds and grasses, roots and all
- Kills weeds in flowerbeds, around trees, shrubs and fences and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard
- Kills weeds, roots and all
- Lawns and gardens can be reseeded or planted soon after treatment
- Make only what you need
- Makes over 10 gallons of solution for easy-to-kill weeds and over 5 gallons of solution for tough or established weeds.
- Multipurpose grass and broadleaved weed control
- No odor
- No root. No weed. No problem.
- No soil activity, must be applied to foliage
- Now a shorter wait for replanting
- Now with glyphosate
- Once it enters the plant, it won't wash off
- Ornamental gardens can be reseeded or planted 1 day after treatment
- Rain fast in hours – enters the plant on contact
- Rain fast in 2 hours for control that doesn't wash away [won't wash away]
- Rainproof in 2 hours
- Rainproof in 2 hours for control that won't wash away
- Satisfaction guaranteed or we will gladly refund purchase price
- Satisfaction guaranteed or your money back [with proof of purchase]
- Speeds absorption to the root for complete kill
- [Spot] Treatment for [lawn] [garden] replanting
- Spray weeds (Use) in flowerbeds, around trees, shrubs and around fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard
- Stronger
- Systemic weed and grass killer for [spot] treatment of unwanted weeds and grasses
- Use around fruits and vegetables
- (Use) For brush control
- (Use) For general weed control: Along fences, paths, patios, sidewalks, and driveways, around trees, shrubs, ornamental plantings, flowerbeds, and buildings and in brick and gravel walkways
- Use to trim and edge landscape areas
- (Use) For landscaping: Use to prepare areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flowerbeds or similar plantings.

- Use for large jobs like garden plot preparation and lawn replacement (renovation)
- (Use) For lawn renovation
- (Use) For spot spraying: Use in and around flowerbeds, ornamental, fruit and nut trees, grapevines, shrubs, fences, driveways, and walkways
- (Use) For stumps
- (Use) For wildlife areas: Use to prepare areas for planting wildlife food. Exotic or undesirable plants can be controlled to allow for planting or recovery of native plant species. Spot treatments can be made to selectively remove unwanted plants
- (Use in) Apply with a Big Shot™ Multi-Purpose Sprayer or other tank sprayer, Ortho Dial 'n Spray or other hose-end sprayer, or a (handheld) trigger sprayer
- Use to refill Imitator Ready-To-Use containers
- Use to prepare sites: for large plantings, for planting flowerbeds, fruit trees, ornamentals, vegetables and gardens, and for renovating lawns
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction
- Visible results in 2 to 4 days
- Water-based formula
- (Weeds) start dying in 1 day (24 hours)
- Won't wash off
- Won't wash away
- Works first time, every time, kills the weeds you see and the root you don't
- Works only when absorbed by the foliage of weeds