

19713-633

03-02-2011

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

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

MAR 02 2011

Subject: Notification of Minor Label Changes Following Registration Transfer  
Product Name: Drexel Phosphorus Acid Technical  
EPA Reg. No: 19713-633  
Your Submission Dated January 28, 2011

Dear Ms. Chan:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notices (PRNs) 98-10 and 2007-4, dated above. A screen of the request has been conducted for its applicability under PRNs 98-10 and 2007-4, and it has been determined that the action request falls within the scope of these documents. Our records have been duly noted, and the label submitted with this application has been stamped "Notification Accepted" and will be placed in our records as current and updated. Should you have any questions regarding this action, you may contact Gina Casciano at (703) 605-0513 or via email at [casciano.gina@epa.gov](mailto:casciano.gina@epa.gov).

Sincerely,

*Linda Hollis*

Linda A. Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)



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

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 19713-633	2. EPA Product Manager Linda Hollis, Chief	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL PHOSPHOROUS ACID TECHNICAL	PM# 91 BPPD	
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 being reviewed under expedited review and labeling to: <b>Notification Accepted</b> EPA Reg. No. <u>                    </u> Date: <u>3/2/11</u> Product Name <u>                    </u> Reviewer: <u>G. Casciano</u>	

**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 (633SP-0111\*). Details are in the cover letter accompanying this submission.

**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  
greater than 5 gallons

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  
*Luza Chan*

3. Title  
REGISTRATION MANAGER

4. Typed Name  
LUZ G CHAN

5. Date  
January 28, 2011

6. Date Application Received  
**(Stamped)**



**Drexel Chemical Company**

January 28, 2011

***Submission of Revised Label per PR Notice 2007-4***  
**DREXEL PHOSPHOROUS ACID TECHNICAL (EPA Reg. No. 19713-633)**

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**

January 28, 2011

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 EPA's Letter dated January 19, 2011 and per PR Notices 98-10 and 2007-4  
DREXEL PHOSPHOROUS ACID TECHNICAL (EPA Reg. No. 19713-633)**

Herewith:

1. Completed EPA Form 8570-1
2. Copy of EPA's Transfer of Pesticide Registration acceptance dated January 19, 2011.
3. Copy of Plant Synergist Phosphorous Acid Technical's most current EPA Stamped Accepted label dated August 15, 2003.
4. Two copies (marked and unmarked) of the label (633SP-0111\*) with the following updates:
  - i) The registration number was changed to "19713-633".
  - ii) The referral statement was changed to "See First Aid Below".
  - iii) Under the 'Directions for Use', the statement "Before using this product.....which is available from the manufacturer." was deleted.
  - iv) The container disposal statements were revised per PR Notice 2007-4..
  - v) The address of the manufacturer was changed to Drexel Chemical Company.
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 Chan  
Registration Manager

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# PHOSPHOROUS ACID TECHNICAL

<b>ACTIVE INGREDIENT:</b>	
Phosphorous acid.....	98.5%
<b>OTHER INGREDIENTS:</b> .....	1.5%
<b>TOTAL:</b> .....	100.0%

**KEEP OUT OF REACH OF CHILDREN  
DANGER / PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

**See First Aid Below**

**EPA Reg. No. 19713-633**  
**EPA Est. No. 19713-XX-XXX**

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

<b>FIRST AID</b>	
<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>
<b>If Swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<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 by 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>
<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>	

633SP-0111\*

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if inhaled, swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid breathing vapor or spray mist, and avoid contact with skin. Wear protective goggles or face shield and dust mask while handling, mixing, or loading. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminate clothing and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS**

For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of in washwater. This pesticide is toxic to fish and aquatic organisms. Do not apply to water. Drift and runoff from treated area may be hazardous to fish and aquatic organisms in adjacent aquatic sites.

**DIRECTIONS FOR USE**

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

For use only in formulating agricultural fungicidal formulations. It is the responsibility of formulators using this product to register all formulations made from it with the EPA as a fungicide.

**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 the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:**

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. 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.

**WARRANTY – CONDITIONS OF SALE**

Manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth on the label when used according to directions under normal use conditions. There are no other warranties, expressed or implied, including warranty of fitness for a particular purpose. This warranty does not extend to the handling or use of this product contrary to label instructions.

**Manufactured By:**  
Drexel Chemical Company  
P.O. Box 13327  
Memphis, TN 38113-0327