

19713-633

3/30/2011

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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
1700 Channel Avenue
P.O. Box 13327
Memphis, TN 38113

MAR 30 2011

Subject: Notification to Revise Storage and Disposal Statement per PRN 2007-4
Product Names: Drexel Phosphorous Acid Technical
EPA Reg. No: 19713-633
Your Submission Dated March 10, 2011

Dear Ms. Chan:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 2007-4, as referenced above. A screen of this request has been conducted for applicability under PRN 2007-4, and it has been determined that the action request falls within the scope of this document. Our records have been duly noted, and the product 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.

Sincerely,

Linda Hollis

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



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 19713-633	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# 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 Notification with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Date: MAR 30 2011 Reviewer: <i>G. Casiano</i> Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<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.

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

Submission of updated label (633SP-0311*). 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	Metal <input checked="" type="checkbox"/> Plastic Glass Paper <input checked="" type="checkbox"/> Other (Specify) <u>supersack</u>		
* 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 <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container less than 50 lbs.; 50 lbs. or more		5. Location of Label Directions <input type="checkbox"/> On the label <input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued 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	
<p align="center">Certification</p> <p>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.</p>					6. Date Application Received (Stamped)
2. Signature <i>Luza Chan</i>			3. Title REGISTRATION MANAGER		
4. Typed Name LUZ G CHAN			5. Date March 10, 2011		

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Drexel Chemical Company

March 10, 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 by Notification
DREXEL PHOSPHOROUS ACID TECHNICAL (EPA Reg. No. 19713-633)

Herewith:

1. Completed EPA Form 8570-1
2. Two copies (marked and unmarked) of the label (633SP-0311*) with the following change:

On page 2, under Storage and Disposal, the correct Pesticide Disposal statements were reinstated based on the August 15, 2003 EPA Stamped Accepted label for Plant Synergist Phosphorous Acid Technical (EPA Reg. No. 75499-2) that was transferred to L&L Formulators (EPA Reg. No. 81309-2) and subsequently to Drexel Chemical Company (19713-633).

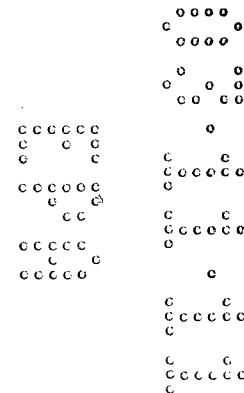
3. Certification statement

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 Chan
Luz Chan
Registration Manager





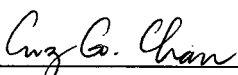
Drexel Chemical Company

March 10, 2011

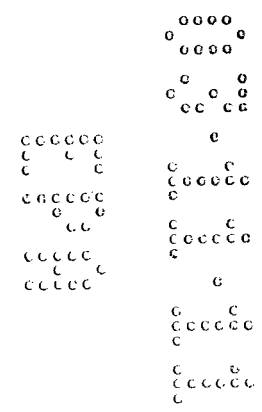
Submission of Revised Label by Notification
DREXEL PHOSPHOROUS ACID TECHNICAL (EPA Reg. No. 19713-633)

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



Notification Accepted

Date: MAR 30 2011

Reviewer: G. Casciano



PHOSPHOROUS ACID TECHNICAL

ACTIVE INGREDIENT:

Phosphorous acid..... 98.5%

OTHER INGREDIENTS: 1.5%

TOTAL: 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: _____

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.
If Swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If Inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth to mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • 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>	

633SP-0311*

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 contaminated 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: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to the label instructions, contact your State pesticide or Environmental Protection Agency Regional Office for guidance.

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