

19713-641

3/26/2014

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Scott A. Pace
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

MAR 26 2014

Notification revising label with corrected ingredient statement adding "(dry basis)"
Drexel 2,4-D Technical
EPA Reg. No. 19713-641
Application Dated: January 17, 2014

Dear Mr. Pace

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the subject product.

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 this notice. The revised label has been stamped "Notification" and will be placed in our records, replacing all previously submitted versions.

If you have any questions regarding this letter, please feel free to contact Grant Rowland at (703) 347-0254 or rowland.grant@epa.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

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United States Environmental Protection Agency Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-641	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL 2,4-D TECHNICAL	PM# 23/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 _____	

NOTIFICATION
MAR 26 2014

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input 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 revised label. 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:				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 <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Polywoven bag		
* 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 pounds; 50 pounds and greater		5. Location of Label Directions <input checked="" type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph 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 Scott Pace	Title Director of Registrations	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 	3. Title Director of Registrations	
4. Typed Name Scott Pace	5. Date January 17, 2014	

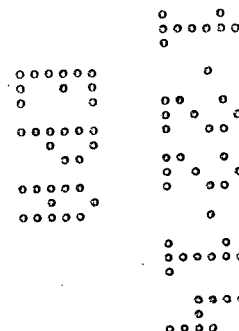


Drexel Chemical Company

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January 17, 2014

Document Processing Desk (NOTIF)
ATTN: Ms. Kathryn Montague, PM 23
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive, Arlington, VA 22202



Re: Submission of Revised Label
Drexel 2,4-D Technical (Reg. No. 19713-641)

Dear Ms. Montague:

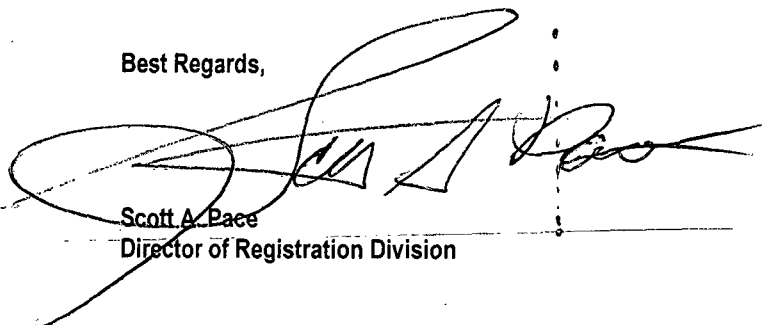
Per our conversation regarding the correction of the ingredient statement on the label to accurately reflect the chemistry as has been done for other products and A.I. for other companies via notification submission, please find enclosed the following:

1. Completed form 8570-1
2. Two copies of the revised label with the corrected ingredient statement adding "(dry basis)". The addition of "(dry basis)" after the ingredient statements precisely reflects the chemistry and registration of the above product. No other changes were made on the label.

One copy of the label has the above change highlighted for easy reference.

If there is anything else that is needed in order to process quickly, please do not hesitate to contact us at #901-774-4370 or Luz Chan : lchan@drexchem.com or Scott Pace : space@drexchem.com

Best Regards,



Scott A. Pace
Director of Registration Division

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NOTIFICATION
MAR 26 2014

2,4-D Technical

For Manufacturing of Herbicides and Plant Growth Regulator Only.

ACTIVE INGREDIENT:

2,4-Dichlorophenoxyacetic acid (dry basis).....	98.78%
OTHER INGREDIENTS (dry basis).....	1.22%
TOTAL:	100.00%

**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. 19713-641
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 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. 	
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 mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice. 	
IF SWALLOWED:	
<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious or convulsing person. 	
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.	
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.	

Manufactured For:



641SP-014*P

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if absorbed through skin, if inhaled or if swallowed. Avoid contact with skin or clothing. Do not get in eyes. Wear protective eyewear (goggles, face shield or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Avoid breathing dust.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. 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.

DIRECTIONS FOR USE

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

For Manufacturing Use Only.

Only for formulation into a herbicide and/or plant growth regulator for the following use(s):

- 1. **Agricultural Crops:**
 Asparagus; Blueberries; Cereal grains (Barley, Millet, Oat, Rye, Wheat); Corn (Field, Pop, Sweet); Cranberries; Crop stubble; Fallow cropland; Grapes (only in California); Grasses (annual or perennial); Grasses grown for seed or sod; Hops; Pastures; Rangeland; Orchard floors (Citrus, Filberts, Nut trees, Pistachios, Pome fruits, Stone fruits); Potatoes (fresh market only), Rice, Sorghum (grain and forage), Soybeans (preplant), Strawberries, Sugarcane, Teff, Turf grown for seed or sod; Vegetables (root and tuber), Wild rice; Conservation Reserve Program (CRP).
- Forestry Sites:**
 Christmas trees; Established conifer release; Forest roadsides; Forest site preparation; Tree and brush control; Tree injection treatments, Reforestation areas.
- Terrestrial Non-food Crops:**
 Uncultivated non-agricultural areas (including ditches, fencerows, hedgerows, roadsides, rights-of-way, utility power lines, railroads, airports, industrial sites), General soil treatment; Recreation areas; Paved areas; Outdoor areas; Ornamental trees, shrubs, and vines; Turf (including golf courses, cemeteries, parks, sports fields, turfgrass, lawns and other grass areas); Uncultivated agricultural areas; Woody plants.
- Aquatic Sites:**
 Agricultural irrigation water and ditches; Agricultural drainage water and ditches; Lakes, ponds and impounded water; Canals, rivers, and streams; Industrial ponds; Swamps, marshes, wetlands; Estuaries, tidal marshes and commercial and sport fish bearing waters.

- 2. Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 3. Uses for experimental purposes that are in compliance with U.S. EPA requirements.

Wettable powder formulations must be packaged in water-soluble packages.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a secured area preferably cool and dry. Open containers in well ventilated areas. Keep container tightly closed when not in use. Store only in original container unless it is damaged and requires to be replaced. In such case, clearly label contents.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. If container is damaged or pesticide has leaked, clean up all spilled materials and place in closed labeled container. 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 label instructions, contact your State Pesticide Environmental Control Agency or the Hazardous Wastes representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

Nonrefillable container. Do not reuse or refill this container. Completely empty bag into manufacturing equipment by shaking and tapping sides and bottom to loosen clinging particles. Then offer for recycling if available or dispose of empty bag 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

To the extent consistent with applicable law, Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes referred to in the "DIRECTIONS FOR USE". 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 and is accepted as such by the Buyer.

The Drexel logo is a registered trademark of Drexel Chemical Company.