



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

April 29, 2022

Mandy K. Styles  
Registration Manager  
Drexel Chemical Company  
P.O. Box 13327  
Memphis, TN 38113-0327

Subject: Notification per PRN 98-10 – Change Primary Brand Name  
Product Name: IMITATOR WEED KILLER CONCENTRATE  
EPA Registration Number: 19713-713  
Application Date: April 18, 2022  
Decision Number: 583921

Dear Mandy Styles:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced 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 PRN 98-10. The label submitted with the application has been stamped “Notification” and will be placed in our records.

The primary brand name for this product has been changed from “DREXEL MH + PA CONCENTRATE” to **“IMITATOR WEED KILLER CONCENTRATE”** and updated in our records.

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 (FIFRA) 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.

If you have any questions, please contact me at [ondish.mindy@epa.gov](mailto:ondish.mindy@epa.gov) or at 202-566-2857.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish".

Mindy Ondish  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

**NOTIFICATION**

19713-713

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

04/29/2022



**IMITATOR WEED KILLER  
CONCENTRATE**

<b>ACTIVE INGREDIENTS:</b>	
Ammoniated soap of fatty acids.....	22.11%
Maleic hydrazide .....	3.00%
<b>OTHER INGREDIENTS:</b> .....	<u>74.89%</u>
<b>TOTAL:</b> .....	100.00%

This product contains 1.86 pounds of Ammoniated soap of fatty acids and 0.25 pound of Maleic hydrazide per gallon.

**KEEP OUT OF REACH OF CHILDREN  
WARNING**

(See **FIRST AID** Below)  
(See Side Panel for “**FIRST AID**”)  
(See Back Panel for “**FIRST AID**”)  
(See Page \_\_\_ for “**FIRST AID**”)  
(See Attached Booklet (Labeling) for Complete Directions for Use)

(Please read the) (See) (inner label) (inner peel-back label) (booklet) for (first aid) (precautionary statements) (storage and disposal) (directions for use)

**SHAKE WELL BEFORE USING  
(RECIRCULATE CONTENTS BEFORE USE)**

EPA Reg. No. 19713-713  
EPA Est. No. 19713-XX-XXX

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

<b>FIRST AID</b>
<p><b>IF IN EYES:</b></p> <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> <p>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.</p>

Manufactured By:



713SP-1020\*

## **PRECAUTIONARY STATEMENTS**

### **Hazards to Humans and Domestic Animals**

**WARNING:** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. 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.

### **ENVIRONMENTAL HAZARDS**

This product may be hazardous to aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface water. Applying this product in calm weather when rain is not predicted for 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 system.

**Surface Water Advisory:** Under some conditions, maleic hydrazide may have a significant potential for runoff into surface water (primarily via dissolution in runoff water) for several days post-application. Conditions favoring runoff include poorly draining soils or wet soils with readily visible slopes, frequently flooded areas, areas where an intense or sustained rainfall is forecast to occur within 48 hours, areas overlying extremely shallow ground water and areas overlying tile drainage systems that flow to surface water.

## **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Keep children and pets out of the treated area until sprays have dried.

### **APPLICATION DIRECTIONS**

Shake well before using.

Mix 1 part of this product with 5 parts of water (25.6 fl. ozs. of this product in 1 gal. of water). Spray weeds until foliage is wet.

### **[ALTERNATIVE STATEMENTS – BASED ON CONTAINER SIZE**

Mix 1 fluid ounce of this product in 5 fluid ounces of water. Spray weeds until foliage is wet.

Mix 16 fluid ounces of this product in 80 fluid ounces of water. Spray weeds until foliage is wet.

Mix 24 fluid ounces of this product in 120 fluid ounces of water. Spray weeds until foliage is wet.

Mix 25.6 fluid ounces of this product in 128 fluid ounces (1 gal.) of water. Spray weeds until foliage is wet.

Mix 32 fluid ounces of this product in 160 fluid ounces (1.25 gals.) of water. Spray weeds until foliage is wet.

Mix 65 fluid ounces of this product in 325 fluid ounces (2.5 gals.) of water. Spray weeds until foliage is wet.

Mix 1 gallon of this product in 5 gallons of water. Spray weeds until foliage is wet.】

Best results are obtained with young, actively growing weeds, less than 5 inches high. Thorough coverage is important.

This product can be used any time during the year and works best during warm and dry conditions when the soil is moist. Application during cold weather may delay appearance of plant damage. It can be used in cultivated areas prior to planting grass, flowers and vegetables. Areas can be re-sown 5 days after treatment.

For spot treatment of individual weeds, apply the mixed solution to the center of the plant. Apply this product to control new weeds growing from seed and regrowth from biennial and perennial weeds. Avoid spraying desirable plants. Contents of this container will cover [XXXX\*] square feet.

Inadvertent overspray of this product does not stain concrete, pavement, stucco or wood.

[\*1 QUART will treat 600 SQ. FT.]

### **USE SITES**

Use on [weeds], [grass], [moss], [algae], [brush], [vines] and [in areas where tough weeds are invading your yard/property] including around and on buildings and other structures, sidewalks, fences, driveways, patios, foundations, gravel, flower gardens, landscaped areas, trees, shrubs, and wooded and vacant lots, fields, trails, garden plot preparation and other areas of your yard/property.

### **PESTS**

Controls or suppresses listed weeds, grasses, moss and algae including Annual bluegrass, Barnyardgrass, Black medick, Broadleaf filaree, Broom\*, Burclover, Cat's-ear, Common chickweed, Common groundsel, Common lamb's-quarters, Corn spurry, Creeping buttercup, Curled dock, Dandelion, English daisy, False dandelion, Fiddleneck, Fleabane\*, Foxtail fescue, Geranium species, Horsetail\*, Kudzu\*, Large crabgrass, Lady's-thumb, Locoweed, Low cudweed, Lupine, Mouse-eared chickweed, Mustard species, Oxalis, Plantain species, Poison ivy\*, Poison oak\*, Poison sumac\*, Red clover, Redroot pigweed, Round leaved mallow, Rush, Sheep sorrel, Shepherd's-purse, Spiny annual sowthistle, Stinkweed, Wild blackberry\*, Wild carrot, Wild hyacinth and White clover.

\*Not registered for use in California

**Precautions:** Contact with Poison ivy, Poison oak or Poison sumac anytime of the year can cause an allergic reaction. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.

Use with care as contact of this product with lawn grass can cause injury to the lawn.

### **Use Restrictions:**

- Do not make more than 1 application of this product ([Insert Product Name]) per year.
- Do not apply more than 6.1 lbs. a.i. of maleic hydrazide in a year from any source.

## **STORAGE AND DISPOSAL**

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material tightly closed in original container only away from open flame. Do not store at temperatures below 39°F.

**PESTICIDE DISPOSAL:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**CONTAINER HANDLING:** 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.

### **[ALTERNATIVE STATEMENTS**

[Buyer assumes all responsibility for safety and use not in accordance with directions.]

[(Company Name) guarantees this product to the extent of the purchase price, only when used according to directions on the label. Buyer assumes all responsibility for safety and use not in accordance with this label.]

## OPTIONAL MARKETING STATEMENTS:

{Note: Text in ( ) are alternate or optional text that could be used in the statement.  
Bracketed text [ ] is for internal use or serves as a placeholder.}

- (This Product) ([Insert Product Name]) Can be used at any time during the year.
- (This Product) ([Insert Product Name]) Can be used in cultivated areas prior to planting grass, flowers and vegetables.
- (This Product) ([Insert Product Name]) Can be used on listed (weeds), (grasses), (algae), (vines), (brush), or (moss) growing on or around (buildings), (sidewalks), (fences), (trees), (bark mulch), (driveways), (patios) and (gravel).
- (This Product) ([Insert Product Name]) Controls listed (weeds), (grasses), (algae), (vines), (brush), (moss)
- (This Product) ([Insert Product Name]) Controls and suppresses the growth of many common annual, bi-annual and perennial weeds as listed.
- (This Product) ([Insert Product Name]) Controls or suppresses many (weeds), (grasses), (algae), (vines), (brush) and (moss) as listed.
- (This Product) ([Insert Product Name]) Does not stain (concrete), (pavement), (stucco) or (wood).
- (This Product) ([Insert Product Name]) is a fast-acting (weed), (grass), (algae), (vines), (brush) and (moss) killer.
- (This Product) ([Insert Product Name]) is a fast-acting, non-selective weed, grass, algae and moss killer and growth inhibitor.
- (This Product) ([Insert Product Name]) is a non-selective herbicide that controls many common listed annual weeds.
- (This Product) ([Insert Product Name]) Kills the listed tough brushy & vine weeds, roots and all.
- (This Product) ([Insert Product Name]) Suppresses many (weeds), (grasses), (algae), (moss) as listed.
- (This Product) ([Insert Product Name]) Suppresses the growth of many biennial and perennial weeds as listed.
- (This Product) ([Insert Product Name]) Will not stain (concrete), (pavement), (stucco) or (wood).
- (Use) For Brush Control
- (Use) For Lawn Renovation
- (Use) For Spot Spraying: Use in and around flowerbeds/ ornamental trees/ shrubs/ fences/ driveways and walkways
- (Use) For Stumps
- (Use) For Weed Control: Use along fences/ paths/ patios/ sidewalks and driveways/ around trees/ shrubs/ ornamental plantings/ flowerbeds/ and buildings/ and in brick and gravel walkways.
- (Provides) Visible (see) results in [3 hours](days)
- A broad spectrum herbicide for vegetation burndown and regrowth prevention
- Absorbed into both broadleaf and grassy weeds
- Absorbs on contact, starts working immediately
- Acts fast
- Acts quickly
- Acts rapidly
- Also use for large jobs such as lawn renovation and vegetable and flower garden preparation
- Ammoniated salts of fatty acids burn down weeds and Maleic hydrazide prevents regrowth
- Apply with tank sprayer, or a (hand held) trigger sprayer
- Approved for many lawn and garden uses
- Areas can be re-sown five (5) days after treatment.
- Before [weed graphics]/ After [weed graphics]
- Begins absorbing on contact
- Begins to work in hours.

- Best results are obtained with young, actively growing weeds, less than five (5) inches in size.
- Blackberry\*, brush and vine killer
- Brush and vine killer
- Can be used on patios, walkways, and driveways; along fences; in landscaping beds; or around flowers, shrubs and trees
- Can reseed or sod lawns 5 days after treatment
- Clock image
- Concentrate
- Concentrated for extra value
- Concentrated formula
- Controls (weeds), (grasses), (algae), (vines), (brush) and (moss)
- Controls many listed weeds and grasses for up to 6 weeks.
- Does not (Doesn't) stain (bricks), (concrete) or (asphalt)
- Down Arrow image
- Easy to apply with an Ortho Dial 'n Spray@, hose-end, tank or (hand held) trigger sprayer
- Economical
- Economical concentrate formula
- Eliminates roots and weeds
- Eliminates unwanted vegetation quickly
- Fast Acting
- Fast-acting (weed), (grass), (algae), (vines), (brush) and (moss) killer.
- Fast-acting for visible results in 12 hours
- Fast-acting formula
- Fast-acting formula absorbs to root more quickly
- For control of listed weeds
- For Outdoor Use around the Home
- For use (with) (in) [sprayer delivery name]
- For Use on Borders, Around Patios, Driveways, and Sidewalks
- For weed control - kills listed weeds and grasses in 1 to 2 weeks - roots and all
- Garden care (product) range (of products)
- Get down to the root(s)
- [Graphic of dead listed weed(s)]
- Great quality. Great Price. Guaranteed. \*Our guarantee is a promise that you'll be fully satisfied with the quality of every (Product Brand Name) product. If for any reason you aren't happy, we'll replace it or return your money – whichever you prefer. All you need to do is return the, empty packaging. It's that simple. Guaranteed. Guaranteed within 1 year of the date of purchase.
- Kills weeds and grasses and brush as listed.
- Kills (spray) listed weeds in flower beds and around fences, trees, shrubs, driveways, walkways and shrubs, in and around fences, patios, paths, sidewalk cracks, walkways.
- Kills (the toughest listed weeds and grasses) the root so weeds (they) don't come back
- Kills (to) the root(s)!
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) fast (and effectively)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) quickly (and effectively)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) rapidly (and effectively)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) within (minutes) (hours)
- Kills listed (annual and perennial) weeds, grasses.
- Kills more listed weeds in more places.
- Kills nuisance blackberry\* plants
- Kills over 45 listed weeds
- Kills different listed weeds and grasses, roots and all
- Kills Poison ivy\* and Poison oak\* in non-garden areas- around homes, cabins, buildings, fences, and



trails

- Kills rapidly
- Kills Roots! (Down Arrow)
- Kills the root
- Kills the root so weeds won't grow back
- Kills the roots of (both) broadleaf and grassy weeds as listed.
- Kills the roots so treated weeds don't (won't) come back ([zap arrow illustration])
- Kills the toughest (weeds), (grasses) and (brush) including (Poison Ivy\*), (Poison Oak\*), (Broom\*), (Kudzu\*), (Wild Blackberry\*) and other listed plants.
- Kills the weed you see and the root(s)
- Kills the weed you see and the root(s) you don't
- Kills tough listed (brush)(blackberry\*)(poison ivy\*)(broom\*) and (weeds)- Roots & All
- Kills tough listed weeds
- Kills tough weeds as listed – roots and all
- Kills tough, brushy, hard-to-control weeds as listed
- Kills unwanted listed weeds and grasses, roots and all
- Kills listed Weeds & (and) Grasses (down to the root)
- Kills listed weeds and grasses in - Patios - Driveways - Sidewalks - Ornamental Gardens and other non-lawn areas
- Kills listed weeds in flowerbeds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard/property.
- Kills listed weeds, roots and all
- Kills within hours
- Lawns and gardens can be reseeded or planted soon after treatment
- Long lasting
- Long term control
- Made in the USA
- Make only what you need
- Maleic hydrazide prevents regrowth (from the roots up)!
- Mix into tank sprayer
- Money Back Guarantee. See Back panel for details.\*
- Multipurpose grass and broadleaf weed control
- New [This claim is valid for 6 months of product launch]
- Next day (this weekend) results: Begins killing on contact, visible results in 12 hours
- No root. No weed. No problem (!)
- Non-selective
- Non-Selective: Kills listed weeds & grasses
- Non-staining (formula)
- Once it enters the plant, it won't wash off.
- One application kills over 45 weeds and grasses/ roots and all (maximum effectiveness)
- Ornamental gardens can be reseeded or planted 1 day after treatment
- Plant damage will be visible from a few hours to 2 days after spraying.
- Prevents plant regrowth for up to 6 weeks.
- Proven (trusted) performance
- Provides maximum control: Kills weeds to the root so they don't ever come back
- Questions or comments? Call (Tel. No.)
- Quick-action formula lets you see results fast
- Quickly kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss)
- RainFast in 3 hours - enters the plant on contact
- Rapid action (herbicide)
- Rapidly kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss)
- Replant (lawn grasses/ herbs/ vegetables (and fruits) 5 days after application



- Same effective results even if it rains within 3 hours
- See attached booklet for (application directions) (directions for use)
- See rapid results
- See results fast
- See results in hours
- See results quickly
- Single application controls (kills) many weeds as listed
- Penetrating formula kills even the toughest weeds as listed
- Spray weeds until thoroughly wet
- Starts to work immediately
- This convenient ready-to-use formula controls (Poison Ivy\*), (Poison Oak\*), (Blackberries\*) and (Kudzu\*)
- To kill Kudzu\*: For best results, apply in mid to late summer when vines are mature and actively growing.
- To kill vine weeds: If vines are growing up poles, fences or tree trunks with mature bark, cut vines at base and treat as directed. If spraying regrowth, shield shrubs and tree trunks from spray drift with a sheet of cardboard or plastic.
- To kill Wild Blackberry\*: Spray anytime plants are actively growing. Dead canes should be cut down and removed. Re-application is often required to kill deep roots.
- Use along fences; in cracks of walks, drives and patios; and around flower beds, trees and shrubs
- Use anytime during the year!
- Use as a spot treatment along sidewalks, fences, driveways, and patios.
- Use for large jobs like garden plot preparation and lawn replacement (renovation)
- Use to prepare sites: for large plantings/ for planting flowerbeds/ fruit trees/ ornamentals/ vegetables and gardens/ and for renovating lawns
- Use to trim and edge landscape areas.
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction.
- Visible (Provides) results in 3 hours (clock image).
- Visible Results in Hours
- Watch it work!
- Weed Eliminator(!)
- Weed Killer(!)
- Won't stain (bricks), (concrete) or (asphalt)
- Works fast!
- Works quickly!
- Works rapidly!
- Works systemically, killing weeds to the root