

19713-20206

11/67/2005

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|--|--|
| 1. Company/Product Number 19713-20206 | 2. EPA Product Manager Marion Johnson | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) DREXEL ROACH POWDER | PM# 10/Insecticide 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 _____ | |

Section - II

| | | |
|--|---|-------------------------------------|
| <input type="checkbox"/> Amendment - Explain below. | <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____ | NOTIFICATION NOV - 7 2005 |
| <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.)

One copy of 202SP-1005 is submitted per PR Notice 2001-6. The required certification statement is also submitted. Thank you.

Section - III

| | | | | | |
|--|---|--|---|---|----------------------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Metal | <input type="checkbox"/> Plastic |
| * Certification must be submitted | | If "Yes" Unit Packaging wgt. No. per container | If "Yes" Package wgt. No. per container | <input type="checkbox"/> Glass | <input type="checkbox"/> Paper |
| 3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container | | 4. Size(s) Retail Container | | 5. Location of Label Directions <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) 774-4300 |
| <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 (Stamp) |
| 2. Signature | 3. Title REGISTRATION MANAGER | |
| 4. Typed Name LUZ G CHAN | 5. Date October 21, 2005 | |



Drexel Chemical Company

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October 21, 2005

Submission of Revised Label per PR Notice 2001-6
DREXEL ROACH POWDER (EPA Reg. No. 19713-20206)

This notification is consistent with the Provisions of PR Notice 2001-6 and the requirements of EPA Regulations at 40 CFR 156.10 and 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 guidance of PR Notice 2001-6 and the requirements of 40 CFR 156.10 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

NOV - 7 2005

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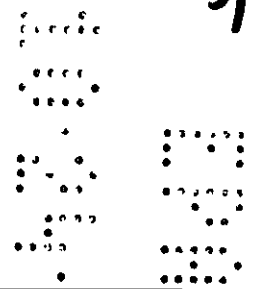
NOTIFICATION

NOV - 7 2005

Drexel

Roach Powder

Kills Roaches, Ants and Silverfish



ACTIVE INGREDIENT:

Boric Acid 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

Read Entire Label Before Using This Product

EPA Reg. No. 19713-20206

EPA Est. No. 19713-GA-1 Net Contents: _____

FIRST AID

IF SWALLOWED:

- 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.

IF IN EYES:

- 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.

IF ON SKIN OR CLOTHING:

- 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. 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

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.

USE RESTRICTION

Children and pets should not be in treatment area until after application is completed. Do not treat pets with this product. Avoid contamination of feed and foodstuffs. Avoid contamination of ornamental plants

DIRECTIONS FOR USE

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

To Control Cockroaches (also known as Palmetto Bugs), Ants and Silverfish: Apply liberally, scattering under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer, tubs, into openings around drains, water pipes and electrical conduits and in cracks and crevices along baseboards and corners of cabinets, cupboards and closets. Remove all lower drawers in kitchen and bathroom cabinets, bedroom dressers and chests of drawers, then scatter liberally in drawer wells. Reapply as necessary. Any powder visible after application must be brushed into cracks and crevices or removed. Apply only in areas inaccessible to children and pets. Avoid contamination of feed and foodstuffs.

Directions for applying in new construction to control Cockroaches. When treating large areas, such as wall voids, soffit and sub-cabinet voids in new and existing construction, dust liberally using dusting application equipment.

Directions for applying as a mop solution to control Cockroaches. Add 1 cup of powder to each gallon of rinse water. Apply to floor areas only. Make only enough for each application. Supplemental treatment only.

This product may be used in homes, restaurants and other food and feed handling establishments, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, industrial plants, theaters, ships, boats, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities and sewers.

CRACK AND CREVICE TREATMENT

Food and Feed Handling Establishments: Places other than private residences in which food or feed is held, processed, prepared or served.

Food Area Application Limited To Crack And Crevice Treatment Only: Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation) also would be considered a food area. Apply in small amounts directly into cracks and crevices using a bulbous duster or other suitable equipment capable of applying insecticide directly into cracks and crevices, in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases, conduits, motor housing and electrical switch boxes where Cockroaches hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces. Application of this product in the food areas of food handling establishments, other than as a crack and crevice treatment are not permitted.

Serving Areas: Facilities where prepared foods are served, such as dining rooms, but excluding areas where food may be prepared or held. Apply as a spot treatment to selective surfaces such as baseboards, under elements of construction into cracks and crevices. Avoid treating surfaces likely to be contacted by food. Do not apply when facility is in operation or foods are exposed.

Non-Food Areas: Include garbage rooms, lavatories, floor drains (to sewer and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Apply to baseboard areas, around water pipes, surfaces behind and beneath sinks, lockers, tables, pallets and similar areas where insects hide or through which they may enter.

Manufactured By

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

202SP-1005

ROACH POWDER Page 1 of 2

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STORAGE AND DISPOSAL

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

STORAGE INSTRUCTIONS: Store in a dry place. Do not store where children or animals may gain access.

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: Completely empty bag into application equipment. Then 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.

CONTAINER DISPOSAL: (For Residential/Household Uses):

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY—CONDITIONS OF SALE

OUR RECOMMENDATIONS 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 recommended and other influencing factors in the use of this product are beyond the control of the Seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

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 directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.



Drexel Chemical Company

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October 21, 2005

Document Processing Desk (**NOTIF**)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm. 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202

**Re: Submission of Revised Label by Notification per PR Notice 2001-6
DREXEL ROACH POWDER (EPA Reg. No. 19713-20206)**

Herewith:

1. Completed EPA Form 8570-1
2. One (1) copy of the label (202SP-1005) with container disposal statements for residential/household uses per PR Notice 2001-6 added.

I highlighted the revisions for easy reference.

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 G Chan
Registration Manager

