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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Luz G. Chan
Registration Manager
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

JAN 28 2010

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Ms. Chan:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notices (PRN) 2007-4 dated November 13, 2009 for:

EPA Registration 19713-105	Drexel Leven-38
EPA Registration <u>19713-1</u>	Drexel Sucker-Stuff
EPA Registration 19713-510	Drexel Drexalin Plus

The Registration Division (RD) has conducted a review of this request for applicability under PR Notices 2007-4 and finds that the label changes requested falls within the scope of PR Notices 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Nicole Williams of my staff at 703-308-5551.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-1	2. EPA Product Manager TONY KISH	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL SUCKER-STUFF	PM# 22/Fungicide 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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____ **NOTIFICATION**
 Resubmission in response to Agency letter dated _____ "Me Too" Application. **JAN 28 2010**
 Notification - Explain below. Other - Explain below.

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

Submission of revised label per PR Notices 2007-4. Thank you.

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 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
					1
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5, 10, 15, 30, 55, 265 Gal; Bulk		5. Location of Label Directions <input type="checkbox"/> _____ <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> 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 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 <i>LuZ G Chan</i> 2009.11.13 08:47:45 -06'00'	3. Title REGISTRATION MANAGER	6. Date Application Received (Stamped)
4. Typed Name LUZ G CHAN	5. Date November 13, 2009	



Drexel Chemical Company

November 13, 2009

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 PR Notices 2007-4
DREXEL SUCKER-STUFF (EPA Reg. No. 19713-1)**

Herewith:

1. Completed EPA Form 8570-1
2. One copy of the label (1SP-1109*) with the following revision per PR Notice 2007-4 :


Under Refillable Containers, "this product" was changed to simply read "pesticide".

The change was highlighted for easy reference.
3. Certification Statement

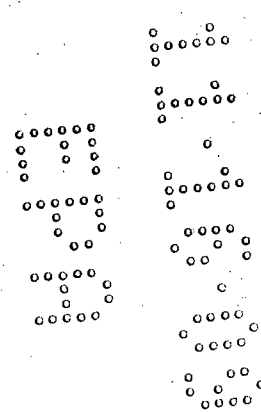
If you have questions/clarification regarding this submission, I can be reached at (901) 774-4370
or e-mail Lchan@drexchem.com.

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY


Luz Chan
Registration Manager

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NOTIFICATION

JAN 28 2010

MH SYSTEMIC

Drexel

Sucker - Stuff[®]

Liquid Growth Retardant

For preventing growth of Tobacco suckers.

ACTIVE INGREDIENT:

Potassium salt of 6-hydroxy-3-(2H)-pyridazinone* 30.2%

OTHER INGREDIENTS: 69.8%

TOTAL: 100.0%

*Hereafter called Potassium salt of maleic hydrazide.

This product contains 2.25 pounds of Maleic hydrazide equivalent per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See **FIRST AID** Below

SHAKE WELL BEFORE USING

EPA REG. NO. 19713-1

EPA EST. NO. 19713-XX-XXX 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.

IF INHALED:

- 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 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: Causes moderate eye irritation. Harmful if swallowed, absorbed through skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride and shoes plus socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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 drained 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 groundwater and areas overlying tiles 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. Do not apply this product through any type of irrigation system. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval (REI). The requirements in this box only apply to uses of this product that are covered by the WPS. Do not enter or allow worker entry into treated areas during the REI of 12 hours.

PPE required for early entry to treated areas that is permitted under the WPS and that involves contact with anything that has been treated, such as plants, soil or water is: Coveralls, chemical-resistant gloves made of any waterproof material and shoes plus socks.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-C327

SINCE 1972

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TO PREVENT SUCKER DEVELOPMENT (FLUE-CURED, BURLEY, DARK-FIRE, MD AND CIGAR (PA AND WI), TOBACCO

SUCKER-STUFF, a plant growth inhibitor, offers a new method of controlling sucker growth by keeping suckers from growing rather than by killing them. Since this product is absorbed and moves inside the Tobacco plant, spraying the whole plant is not necessary. Best results are obtained by spraying the upper one-third to one-half of the plant. It is very important to apply equal amounts of this product to each plant at the correct time to obtain satisfactory control.

WHEN TO SPRAY FOR FLUE-CURED, BURLEY, DARK-FIRE AND MD TOBACCO

1. If all plants flower at about the same time; proceed as follows: As soon as the plants are in full flower, top, pull all suckers from early-maturing plants and spray this product uniformly onto the entire field within 24 hours after topping (See "NOTES" 1-14).
2. If there is a wide range in the time of flowering, the following procedure should be used:
 - a. Go through the field and top the few early-flowering plants.
 - b. Wait until the remaining plants are in full flower, top them, remove all suckers from the entire field and apply this product within 24 hours after topping (See "NOTES" 1-14).

Tip leaves to be harvested should be at least 6 inches long at time of spraying.

WHEN TO SPRAY FOR PA CIGAR TOBACCO

1. If your field flowers uniformly:
 - a. Top when about one-fourth to one-half of your plants show one or more open flowers on each head.
 - b. Wait three days after topping.
 - c. Spray this product. For best results, this product should be sprayed on dry or nearly dry leaves. Avoid spraying on leaves covered with dew.
2. If your field does not flower uniformly:
 - a. When flowering in your field is particularly uneven, you should top when about 50% to 60% of the plants show one or more open flowers per head.
 - b. Wait three days after topping and remove, by hand, any suckers more than 2 inches long.
 - c. Spray this product over your entire field.

WHEN TO SPRAY FOR WI CIGAR TOBACCO

1. Top the field when most of the plants in your field are in full flower.
2. Remove, by hand, any suckers larger than one or two inches.
3. Spray within 24 hours after topping and removal of suckers.

HOW TO SPRAY

This product may be applied with either a tractor drawn insecticide sprayer or with a compressed air shoulder sprayer.

1. **Tractor-drawn insecticide sprayers:** Any number of nozzles may be used (See "NOTE" 6). Can be applied in the same manner as insecticide, spraying one or more rows at a time, wetting upper one-third or one-half of plant.
2. **Compressed air shoulder sprayer with single nozzle spraying a wide cone:** Spray one side of each Tobacco row while walking at a constant rate. Use an up and down motion of spray nozzle to moisten upper 6 to 8 leaves of each plant. Apply equal amounts of spray to each plant.

AMOUNT OF SPRAY

Apply the recommended amounts of this product in 30 to 50 gallons of water per acre. Do not use less than 30 gallons of water per acre.

FOR FLUE-CURED, BURLEY, CIGAR (PA and WI) AND MD TOBACCO

Apply 1 pint of this product per 1,000 plants.
Example: Use 1 gallon of this product for 8,000 plants per acre.

FOR DARK TOBACCO

Apply 2 pints of this product per 1,000 plants.
Example: Use 2 gallons of this product for 8,000 plants per acre.

NOTES:

1. To control Tobacco suckers, apply this product at the proper time. Too early spraying may prevent normal development of top leaves. Too late spraying will allow some sucker growth. **FULL FLOWER** is the stage when 90% of your plants have begun to shed their first flowers.
2. Rains occurring within 6 hours after spraying may reduce effectiveness.
3. At 40°F and below, the formulation will form solids. It readily redissolves, but must be warmed to 50°F or above. The larger the container, the more time is needed to completely redissolve the precipitate.
4. Follow dosage recommendations carefully. Spray field uniformly and do not use less than the minimum amount of water recommended on Tobacco.
5. Do not use on Tobacco plants grown for seed production.
6. Do not spray Tobacco in the middle of hot, dry days when leaves are severely wilted. For best results, spray during early morning, all day on cloudy days, avoiding the late afternoon or night applications. (Use a nozzle delivering a fine mist spray. Do not

use a broad jet (of spray.)

7. Closely hand-sucked or Tobacco treated with this product will not ripen as rapidly as poorly suckered Tobacco. Also, under some conditions, tips treated with this product have a tendency to turn yellow prematurely. This is not harmful and does not mean that your Tobacco is ripe. Therefore, do not harvest Tobacco treated with this product by using time and color of the leaves as your only guide to ripeness. Use other characteristics indicative of ripeness such as (a) Fading of color from midrib, and (b) Change in apparent leaf texture.
8. If Tobacco plants have been grown under drought conditions, absorption of this product will be slow and results may not be as good as plants grown under more favorable moisture conditions.
9. Too little of this product will result in less than desired control. Too much is wasteful and may cause burning of leaves and may reduce quality of tips.
10. This product is not corrosive to spray equipment.
11. Rinse spray equipment with water after application. Do not contaminate water supplies by cleaning of equipment or disposal of wastes.
12. Use only one application of this product to Tobacco per season.
13. Allow at least 7 days after application before harvest of Tobacco.
14. Should washoff occur within 6 hours of application to Tobacco, a single repeat application may be made.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Storage should be under lock and key in a ventilated room and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Do not stack containers over 2 pallets high. Move containers by handles or case. Do not move containers from one area to another unless they are securely sealed. Keep containers tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original containers only. If the contents are leaking or material is spilled, follow these steps:

1. Contain spill. Absorb with a material such as sawdust, clay granules or dirt.
2. Collect and place in suitable containers for disposal.
3. Wash area with soap and water to remove remaining pesticide.
4. Follow washing with clean water rinse.
5. Place a leaking container in a plastic tub and transfer contents, as soon as possible, to an empty, original container.
6. Do not allow runoff to enter sewer or contaminate water supplies.
7. Dispose of waste as indicated below:

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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 or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

Nonrefillable Container (rigid material; less than 5 gallons): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. 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.

Nonrefillable Container (rigid material; 5 gallons or greater): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Staff the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. 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.

Refillable Containers:

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container.

(Continued)

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STORAGE AND DISPOSAL (Cont'd)

Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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

