



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Ms Luz G Chan Drexel Chemical Company PO BOX 13327 Memphis, TN 38113-0327

'JUL 3 0 2013

Subject:

Notification for label changes per PRN 98-10 and 2007-4: Storage disposal update

and other change

Submission date: 7/10/13

Product Name: Drexel Sucker Stuff

EPA Reg. No. 19713-1 Decision Number 481063

Dear Ms Chan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 and 2007-4 dated 7/10/13 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and 2007-4, and finds that the action(s) requested fall within the scope of PRN 98-10 and 2007-4. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have questions concerning this letter, please call Banza Djapao at 703-305-7269 or you may call me at 703-308-9443.

Sincere

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Tony Kish

Product Manager 22 Fungicide Branch

Registration Division (7504P)

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		Application fo	r Pesticide -	Section				
. Company/Product Number 19713-1		2. EPA Product Manager Tony Kish			3. Pt	3. Proposed Classification None Restricted		
. Company/Product (Name DREXEL SUCKER-S			PM# 22 / Fungio	cide Branc	h		Noue	Nestricted
Name and Address of A rexel Chemical Company O. Box 13327 lemphis. TN 38113-0327	pplicant (Include ZIP Cod	de)	(b)(i), my pr to: EPA Reg.	oduct is sir			FIFRA Section emposition and	
			Product Nection - II	ame				
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July 10, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Adding the Specific Pack Size for Refillable and Nonrefillable Containers & Others
DREXEL SUCKER-STUFF (EPA Reg. No. 19713-1)

Sir / Madam:

In conjunction with the above, please find:

- 1. EPA Form 8570-1
- 2. Marked and clean copy of the revised label with the following changes:
 - "Shake Well Before Using" was deleted as it is not relevant for this product.
 - The pack sizes for nonrefillable and refillable containers were specified for clarity.

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,
DREXEL CHEMICAL COMPANY

Luz G Chan

Registration Manager

NOTIFICATION

JUL 3 0 2013





Sucker-Stuff®

Liquid Growth Retardant

For preventing growth of Tobacco suckers.

ACTIVE INGREDIENT:

Potassium salt of 6-hydroxy-3-

*Hereafter called Potassium salt of maleic hydrazide.
This product contains 2.25 pounds of Maleic hydrazide equivalent per

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

CAUTION See FIRST AID Below

EPA Reg. No. 19713-1 EPA Est. No. 19713-XX-X

Net Content:

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 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 run-off into surface water (primarily via dissolution in run-off water) for several days post-application. Conditions favoring run-off 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 green dwater and areas overlying tiled 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 of 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.

Manufactured By:

Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972

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 nterval (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.

TO PREVENT SUCKER DEVELOPMENT ON 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

- 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 earlymaturing plants and spray this product uniformly onto the entire field within 24 hours after topping (See "NOTES" 1-14).
- 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.
 - 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.

- 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 the spray nozzle in an up and down motion to moisten upper 6 to 8 leaves of each plant. Apply equal amounts of spray to each plant.

AMOUNT OF SPRAY

Apply the recommended an ounts 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.

- To control Tobacco suckers, apply this product at the proper time. Spraying too early may prevent normal development of top leaves. Spraying too late will allow some sucker growth. FULL FLOWER is the stage when 90% of your plants have begun to shed their first flowers.
- Rains occurring within 6 hours after spraying may reduce effectiveness.
- 3. At 40°F and below, the formulation will become solid. 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.
- 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 type of spray.)
- 7. Closely hand-suckered 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.
- 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.
- 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 gersons and children. Storage should be in &cook, day 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 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, collow these steps:

- 1. Contain spill. Absorb with a material such as sawdust, വഴ 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.
- Place a leaking container in a plastic tub and transfer contents, as soon as possible, to an empty, original container.
- 6. Do not allow run-off to enter sewer or contaminate water supplies.
- 7. Dispose of waste as indicated below:

(Continued)

STORAGE AND DISF SAL (Cont

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 up to < 250 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. 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. Stand 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 Container (≥ 250 gallons & Bulk): 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. 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—CONFOONS OF SALE

OUR DIRECTIONS FOR build 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.

SUCKER-STUFF and the DREXEL logo are registered trademarks of Drexel Chemical Company.

NOTIFICATION
JUL 3 0 2013