



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 22, 2015

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

Subject: Notification per PRN 98-10 – Minor Label Revisions
Product Name: DREXEL SUCKER STUFF
EPA Registration Number: 19713-1
Application Date: 5/14/2015
Decision Number: 505300

Dear Ms. Chan:

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.

If you have any questions, you may contact Angela Hollis at 703-347-0216 or via email at hollis.angela@epa.gov.

A handwritten signature in cursive script that reads "Shaja B. Joyner".

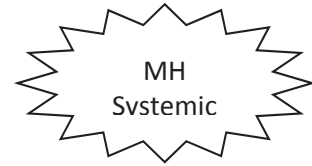
Shaja B. Joyner, Product Manager 20
Fungicide-Herbicide Branch
Registration Division 7505P

NOTIFICATION

19713-1

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:

06/22/2015



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

EPA Reg. No. 19713-1

EPA Est. No. 19713-TN-1

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 do so by a poison control center or doctor.
- Do not give anything 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.
- Call a poison control center or doctor for treatment advice.

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.

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 further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 800-424-9300 for emergency.

1SP-0515*

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 exist, 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 groundwater 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 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.

PRODUCT INFORMATION

SUCKER-STUFF is a plant growth inhibitor that offers a new method of controlling sucker growth by keeping suckers from developing in Flue-cured, Burley, Dark-fire, Maryland and Cigar (Pennsylvania and Wisconsin) Tobacco. Because 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 as labeled to obtain satisfactory control.

MIXING INSTRUCTIONS

The diluted emulsion is most easily prepared by adding the required amount of this product into the spray tank one-half filled with water using mild agitation. Then add sufficient water to the spray tank to total the required minimum solution.

Note: In order to minimize the possibility of injury to the Tobacco plants, do not mix this product with other chemicals such as insecticides, fungicides or herbicides or apply this product to plants which have recently been treated with such chemicals.

APPLICATION RESTRICTIONS

- Do not make more than one application per season.
- Do not use on Tobacco plants grown for seed production.
- Allow at least 3 weeks after application of this product before harvest of Tobacco.

APPLICATION INSTRUCTIONS

Rate of Application

Mix 1 to 1.5 gallons of this product in sufficient water totaling a minimum of 50 gallons per acre for all types of Tobacco.

Time of Application

Flue-cured, Burley, Dark Fire and Maryland Tobacco

1. If plant flowering is uniform, proceed as follows: Top Tobacco plant terminals and remove all suckers when 10 to 25% of plants are in early bloom (first flower tube to bloom). Spray this product uniformly onto the entire field within 24 hours after topping.
2. If a wide range in the time of flowering prevails, follow the following procedures:
 - a. Top early-flowering plants and remove all suckers. If no sucker control product has been applied, apply a contact agent such as Sucker-Plucker[®], Antak[®] or a local systemic such as Drexalin[®] Plus, Plucker-Plus[™] to the Tobacco within 24 hours of topping.
 - b. Within 5 to 7 days, top remaining plants, remove all suckers and apply this product within 24 hours after topping.
3. When spraying this product, avoid applications to Tobacco plants covered with dew and immediately following rainfall or irrigation. Optimum times of application are from mid-morning until noon and after daytime peak temperatures subside.
4. Avoid heat of day applications.
5. Avoid late evening or night applications of this product as dew formation on Tobacco leaf surface will produce runoff of the systemic agent in this product, thus reducing effectiveness.

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

Pennsylvania and Wisconsin Cigar Tobacco

1. If plant flowering is uniform, top when 25% of Tobacco plants are in early bloom (first flower tube to bloom). Spray this product uniformly onto the entire field within 24 hours after topping.
2. If plant flowering is non-uniform, top when older plants are 10 to 25% early bloom (first flower tube to bloom) and remove all suckers. If no sucker control product has been applied, apply a contact agent such as Sucker-Plucker, Antak or a local systemic such as Drexalin Plus, Plucker-Plus to the Tobacco within 24 hours of topping. Within 5 to 7 days, top remaining plants, remove all suckers and apply this product within 24 hours after topping.
3. When spraying this product, avoid applications to Tobacco plants covered with dew and immediately following rainfall or irrigation. Optimum times of application are from mid-morning until noon, and after daytime peak temperatures subside.
4. Avoid heat of day applications.
5. Avoid late evening or night applications of this product as dew formation on Tobacco leaf surface will produce runoff of the systemic agent in this product, thus reducing effectiveness.

METHODS OF APPLICATION

Hand Application

This product may also be applied with hand-held equipment or with backpack sprayer. Apply a coarse spray directed downward at the top of the stalk from 6 to 8 inches above the top leaves. Very little tank pressure is required and in no case should more than about 20 pounds per square inch (psi) be used.

Powered Spray Equipment

Broadcast Application: When applying as a broadcast spray or straight boom application, use one nozzle directed over the center of the row and one nozzle directed over the center of the row-middle (TG-3, TG-5 full cone tips or equivalent) spraying one or more rows at a time, wetting upper one-third or one-half of each plant. Maintain a coarse spray using 25 to 35 psi boom pressure. By using TG-3 spray tips, spraying at 25 to 35 psi pressure and operating at a speed of 1.5 to 3 mph, apply in a minimum of 50 gallons of diluted emulsion per acre of Tobacco. By using TG-5 spray tips, spraying at 25 to 35 psi pressure and operating at a speed of 3 to 5 mph, apply in a minimum of 50 gallons of diluted emulsion per acre of Tobacco. Apply the diluted product to Tobacco as a coarse spray from a height of 12 to 16 inches above the top of the stalk.

Directed Application (3 Nozzles): When applying as a directed spray, use three nozzles per row (TG-3, TG-5 full cone tips or equivalent) spraying one or more rows at a time, wetting upper one-third or one-half of each plant. Direct one TG-5 nozzle downward over the center of the row and TG-3 nozzles (9 inches on each side) directed at or slightly above the top of the stalk. Keep boom pressure at 20 to 25 psi and never exceed 30 psi. By using TG-3, TG-5 spray tips, spraying at 20 to 25 psi pressure and operating at a speed of 2.5 to 3 mph, apply a minimum of 50 gallons of diluting emulsion per acre of Tobacco. Apply the diluted product to Tobacco as a coarse spray from a height of 12 to 16 inches above the top of the stalk.

Use Precautions

If allowed to stand for extended periods of time, the diluted emulsion may separate. Always remember to mix well immediately before using and maintain agitation during application. Be sure that all spray equipment has been carefully cleaned prior to using.

NOTES:

1. For best Tobacco sucker control, apply this product at the proper time. Spraying too early may prevent normal development of top leaves. Spraying too late may allow some sucker growth.
2. At 40°F and below, the formulation will become solid. It readily re-dissolves, but must be warmed to 50°F or above. The larger the container, the more time is needed to complete and re-dissolve the precipitate.
3. Follow rate use directions carefully. Spray field uniformly and do not use less than the minimum amount of water specified.
4. Do not spray Tobacco in the heat of day on dry days when leaves are severely wilted. For best results, spray from mid- morning until heat of day, resuming spray applications after daytime temperature peaks subside.
5. Avoid late evening or night applications of this product as dew formation on Tobacco leaf surface will produce run-off of the systemic agent in this product, thus reducing effectiveness.
6. 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.
7. If Tobacco plants have been grown under drought conditions, absorption of this product will be slow and control may not be equal to plants grown under more favorable moisture conditions.
8. When preparing the diluted emulsion of this product, it is most easily prepared by adding the required amount of this product to your spray tank one-half filled with water using mild agitation and then adding water for the required minimum solution.
9. This product is non-corrosive to spray equipment.
10. Clean spray equipment with water after applications are completed. Do not contaminate water supplies when cleaning of equipment or disposal of wastes.
11. Should rainfall produce an occurrence of wash-off within 6 hours of application to Tobacco, a single repeat application of this product may be made.

STORAGE AND DISPOSAL

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

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 cases. 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. Avoid contamination with oxidizing materials. 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 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

(Continued)

(Continuation)

CONTAINER HANDLING:

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 (\geq 250 gals. & 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—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.

Manufactured By:



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