

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 18, 2020

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

Subject: Registration Review Label Mitigation for Maleic Hydrazide

Product Name: Drexel Sucker Stuff EPA Registration Number: 19713-1 Application Dates: 11/03/2016 Decision Numbers: 525763

#### Dear Luz Chan:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Maleic Hydrazide Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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 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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

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If you have any questions about this letter, please contact Quinn Gavin by phone at 703-347-0325, or via email at <a href="mailto:gavin.quinn@epa.gov">gavin.quinn@epa.gov</a>.

Sincerely,

Linda Arrington, Branch Chief Risk Management and Implementation Branch 4 Pesticide Re-Evaluation Division Office of Pesticide Programs

Enclosure

## MASTER LABEL FOR EPA REG. NO. 19713-1

## **Contains the following Brand Names:**

- DREXEL SUCKER-STUFF (Label For Use on Tobacco)
- DREXEL RETARD
   (Label For Growth Inhibition of Trees, Shrubs, Ivy, Grass and control of Wild Onions and Wild Garlic)

### ACCEPTED

Dec 18, 2020

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 19713-1

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Dec 18, 2020

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 19713-1







Liquid Growth Retardant

For preventing growth of Tobacco suckers and for use against Bacterial wilt.

#### **ACTIVE INGREDIENT:**

OTHER INGREDIENTS: 69.8% 

This product contains 2.25 pounds of maleic hydrazide acid equivalent (a.e.) per gallon.

### **KEEP OUT OF REACH OF CHILDREN** CAUTION

#### See FIRST AID Below

EPA Reg. No. 19713-1 EPA Est. No. 19713-TN-1

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#### **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 person.

#### IF IN EYES:

- Hold eve 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-tomouth, 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 call CHEMTREC at 800-424-9300 for emergency medical information.

1SP-1220\*P

<sup>\*</sup>Hereafter called Potassium salt of maleic hydrazide.

#### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

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

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

#### Applicators and other handlers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves made of any waterproof material including 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.

#### **ENGINEERING CONTROLS**

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:

- · Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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 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, including 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 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 amount of this product to each plant as labeled to obtain satisfactory control.

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.

Applications of this product can also influence the severity of Bacterial wilt on Tobacco during topping and harvesting. Reduction and suppression of Bacterial wilt on Tobacco is dependent on timing of application of maleic hydrazide (MH).

This product is not corrosive to spray equipment.

#### **USE PRECAUTIONS**

- 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.
- In order to minimize the possibility of injury to the Tobacco plants, do not mix this product with other chemicals including insecticides, fungicides or herbicides or apply this product to plants which have recently been treated with such chemicals.
- 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 including (a) fading of color from midrib and (b) change in
  apparent leaf texture.
- Be sure that all spray equipment has been carefully cleaned prior to using.

#### 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.

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.

#### **APPLICATION RESTRICTIONS**

- Do not make more than one application per year on Tobacco. However, a single repeat application of maleic hydrazide not to exceed 6.1 pounds per acre may be made if rain occurs within 6 hours of application of this product.
- Maximum annual application rate must not exceed 2.7 gallons of this product (6.1 lbs. a.e.) per acre.
   Exception: One repeat application of maleic hydrazide not to exceed 6.1 pounds per acre is permitted if rain occurs within 6 hours of application of this product.
- Do not use on Tobacco plants grown for seed production.
- Allow at least 7 days after application of this product before harvest of Tobacco.

#### **APPLICATION INSTRUCTIONS**

- 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.
- Do not spray Tobacco in the heat of day or 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.
- 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.
- Follow rate use directions carefully. Spray field uniformly and do not use less than the minimum amount of water specified on the label.
- Should rainfall produce an occurrence of washoff within 6 hours of application to Tobacco, a single repeat application of this product may be made.

#### 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 including Sucker-Plucker<sup>®</sup>, Antak<sup>®</sup> or a local systemic including Drexalin<sup>®</sup> Plus, Plucker-Plus<sup>®</sup> 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.

Spray Tobacco plants when tip leaves to be harvested are at least 6 inches long.

#### 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 including Sucker-Plucker, Antak or a local systemic including 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.
- 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.

#### **Reduction and Suppression of Bacterial Wilt**

For reduction and suppression of Bacterial wilt, apply this product at the rate of 1 to 1.5 gallons per acre in 50 gallons volume per acre within 12 hours or less after removal of first leaf (i.e., first harvest).

#### **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.

Do not use more than 20 pounds per square inch (psi).

#### **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 the 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 the 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.

**Note:** Clean spray equipment with water after applications are completed. Do not contaminate water supplies when cleaning of equipment or disposal of wastes.

#### STORAGE AND DISPOSAL

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

**STORAGE:** Store under lock and key in a ventilated room and secure from access by unauthorized persons and children. Store 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 including 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:** To avoid wastes, use all materials in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often, such programs are run by State or local governments or by industry).

#### **CONTAINER HANDLING:**

Nonrefillable Container (rigid material; ≤ 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 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 believed adequate and reliable. Follow directions carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials or the manner of use or application, all of which are beyond the control of the Manufacturer of Seller. All such risks shall be assumed by the user or Buyer.

To the extent consistent with applicable law, Manufacturer or Seller makes no other warranties, expressed or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. To the extent consistent with applicable law, in no case shall the Manufacturer or Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.



SUCKER-STUFF, ANTAK, DREXALIN, PLUCKER-PLUS, SUCKER-PLUCKER and the Drexel logo are registered trademarks of Drexel Chemical Company.

### ACCEPTED

Dec 18, 2020

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 19713-1





### Liquid Growth Retardant

#### **ACTIVE INGREDIENT:**

OTHER INGREDIENTS: 69.8% 

This product contains 2.25 pounds of maleic hydrazide acid equivalent (a.e.) 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 by mouth to an unconscious 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-tomouth, 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 call CHEMTREC at 800-424-9300 for emergency medical information.

1RSP-0220\*P

<sup>\*</sup>Hereafter called potassium salt of maleic hydrazide.

### PRECAUTIONARY STATEMENTS

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

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

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

#### Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material including 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.

#### **ENGINEERING CONTROLS**

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:**

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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 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, including plants, soil or water is: Coveralls, chemical-resistant gloves made of any waterproof material, and shoes plus socks.

#### PRODUCT INFORMATION

RETARD can be used along highways, airports, military installations, golf course fairways, roughs and similar areas.

This product is not corrosive to spray equipment.

#### **USE PRECAUTION**

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.

#### **USE RESTRICTIONS**

- Do not make more than one application per year.
- Maximum annual application rate must not exceed 2.7 gallons of this product (6.1 lbs. a.e.) per acre.
- Do not pasture livestock in or cut hay from treated areas.
- Do not feed treated foliage to livestock or graze treated areas.

#### FOR INHIBITION OF GROWTH OF TREES, SHRUBS AND IVY

This product will inhibit growth of various trees, shrubs and Ivy. Prune the plants first into the desirable shape. After regrowth of 2 to 4 inches occurs, spray on this product. This product can also be applied in the Spring as soon as new leaves have expanded. The following tree species can be treated: Alder, Elm, Oak, Poplar, Sweet gum, Sycamore, Tamarack and Willow.

The following shrubs can be treated: Algerian ivy, Cissus, Eugenia, Forsythia, Hahns ivy, Honeysuckle, Ice plant, Myrtus, Pittosporum, Privet, Pyracantha, Viburnum and Xylosoma.

Do not spray on trees when wind velocity exceeds 15 miles per hour.

#### **HOW TO APPLY**

Add 1.3 gallons of this product to 100 gallons of water. Spray the solution in the upper half of the tree if top terminal growth is to be inhibited. If the side of the tree is to be inhibited, spray half of the tree on the pruned side. For shrubs and Ivy, spray all surfaces of the leaves and bark. Apply solution to shrubs and Ivy at a rate of 100 gallons per acre or to trees at a rate of 200 gallons per acre. Wet all surfaces of leaves and bark.

**Compressed Air Shoulder Sprayer:** Add 4 tablespoons of this product to 1 gallon of water and apply the solution to shrubs at a rate of 100 gallons per acre or to trees at a rate of 200 gallons per acre. Hose-end attachments can be used to spray trees and shrubs. Wet all surfaces of leaves and bark. Consult instructions on applicator for delivering the equivalent of 1.3 gallons of this product in 100 gallons of water (equals 4 tablespoons of this product in 1 gallon of water).

**10X Concentrate Spray:** Concentrate spray equipment can be used replacing 90% of the water normally used in dilute sprays. Consult manufacturer for specific instructions if you plan to use a concentrate spray.

When to Spray Trees and Shrubs: Best results are obtained when the spray is applied to vigorous new growth. For example:

- 1. In the Spring, just as the new leaves have expanded and new growth has started.
- 2. In the Summer, after pruning and new regrowth is 2 to 4 inches in length.

#### HOW THIS PRODUCT INHIBITS GRASS GROWTH

This product is absorbed into the green grass blades and translocated by the plant fluids to the active growth areas of the plant where cell division is retarded. This product prevents seed head formation and slows down leaf growth. If an area is not mowed after this product is applied, the Turf will slowly grow to 6 or 12 inches in height by the end of the growing season as the effect of this product gradually "wears off".

If this product is not applied before the seed head is formed, the seed head will expand in spite of the presence of this product. If this occurs, allow at least one week for this product to circulate throughout the plant. Then mow the area no less than 4 inches in height. Inhibition of subsequent growth will then be observed. If a neatly clipped appearance is required, supplement the application of this product by mowing.

#### **HOW TO APPLY**

Apply this product to green grass since brown grass will not absorb the spray. Use of this product is limited to one application per year made either in the Fall or the Spring followed by correct maintenance procedures to produce required Turf growth control.

**Spring Application (about April 10 to June 1):** Use 1.3 gallons of this product in 50 gallons of water per acre to reduce or eliminate mowing. The two week period in the Spring when the grass has grown 2 to 4 inches is ideal for applying this product. This is the period when Dandelion and Forsythia are in full bloom. The grass is in a vigorous growing condition and will absorb the chemical at the maximum rate. It will prevent seed head formation and inhibit growth of foliage. If spraying is delayed beyond this period, a mowing may be required to trim the area to improve appearance. Allow one week for translocation of the chemical before this mowing. Do not spray newly mowed areas covered with debris as this will interfere with coverage and absorption, causing poor results.

Fall Application (about October 1 to November 15): Use 1.3 gallons of this product in 50 gallons of water per acre to reduce growth next season. The Fall treatment is applied to green grass before it becomes dormant. Since growth is inhibited the following Spring, the area will "green up" about two weeks later than untreated grass. Apply this product as close to the time the grass becomes dormant as possible, but when it is still green. Do not spray when there is a cover of fallen leaves as this will interfere with coverage and absorption, causing poor results. This product will control Wild onion, Garlic and biennial type weeds including Dandelion and Plantain when applied in the Fall. Do not apply during the Summer (June 1 to September 25) since most permanent grasses become partially dormant in the Summer. (The major reason for Summer mowing is the presence of annual grasses and weeds which will have to be controlled by herbicides or mowing since they are not present when this product is applied to the perennial grasses.)

#### **CONTROL OF ANNUAL BLUEGRASS**

To reduce *Poa annua* (Annual bluegrass) on golf course fairways, first mow area twice in normal sequence, usually 5 to 8 days apart. When third mowing is needed, before the first *Poa annua* seed heads appear, spray 0.25 gallon of this product in 30 to 40 gallons of water per acre. (If over 40 gallons of water is used per acre, the effectiveness may be reduced.) The effect of treatment should be evident in 8 to 10 days. This "light" treatment of this product eliminates or greatly reduces reseeding of *Poa annua* with little retarding of grass growth.

#### RYEGRASS IN BERMUDAGRASS

Excessive growth of Bermudagrass on golf greens is often a problem in the Fall after verticutting, fertilization, overseeding and top dressing. Apply 0.6 gallon of this product in 50 gallons of water per acre in late September or early October to inhibit the growth of Bermudagrass and enable Rye or other grasses to produce a good stand. Apply this product with a calibrated boom sprayer. The Bermudagrass must be in good condition. Overseed no sooner than 48 hours after spraying.

#### TO INHIBIT GRASS ALONG EDGES OF HOME LAWNS

(See "Note" below.) Apply the equivalent of 0.3 gallon of this product in 100 gallons of water per acre in the Spring (about April 10 to June 1) to a 6 inch band along sidewalks and edges of shrubs and trees. For compressed air shoulder sprayer, add 4 tablespoons of this product in 1 gallon of water and spray a 6 inch band 800 feet long. Hose-end attachments can be used for edging of lawns. Consult instructions on applicator for delivering the specified dosage by edging.

# TO CONTROL WILD ONIONS AND WILD GARLIC IN LAWNS AND GRASS AREAS ALONG HIGHWAYS (Not Pasture or Crop Land)

Apply 1 to 2 gallons of this product in 20 to 100 gallons of water per acre in the Spring or Fall when about 90 to 95% of the bulbs have started regrowth. Use on lawns only when grass is brown and dormant.

For control of Wild onions and Garlic, do not apply to young seedlings less than one season old or Winter pastures consisting of small grains including Rye.

#### **EQUIPMENT TO APPLY THIS PRODUCT**

It is essential that this product be applied uniformly with the proper equipment.

#### **Equipment**

- 1. In all cases, equip trucks with a special speedometer or tachometer reading from 0 to 15 miles per hour. Truck speedometers are often inaccurate at this low speed. Use a centrifugal pump with a capacity of 100 gallons per minute and 50 pounds nozzle pressure plus off-center nozzles to apply this product. A series of nozzles activated by valves controlled within the cab permits application at 10 to 15 miles per hour covering all types of terrain found along highways. The off-center nozzle will cover up to 30 feet from the road on calm days.
- 2. Booms:
  - a. The Burg-Bean boom gives excellent coverage when properly calibrated and operated. Smaller amounts of water (30 to 50 gallons per acre) may be used when applying this product with booms.
  - b. Small booms mounted on tractors or jeeps are satisfactory when properly fitted with nozzles, calibrated and operated. Booms are advised only when there are few or no obstructions.
- 3. Air Carry Method (Modified Air Blast Sprayer): This is the newer method for applying this product. Large, low-pressure droplets ride the air stream and deposit this product on the difficult-to-mow areas. It is the only equipment that will economically and satisfactorily apply this product over wide areas (up to 90 feet). It will easily cover all types of terrain on shoulders and medians.

#### Use of 2.4-D

2,4-D may be used with this product when control of broadleaf weeds is desired in Turf. A low-volatile ester or amine salt formulation is compatible with this product. In some areas, weeds may emerge after this product is applied. A second application of 2,4-D would be necessary to control these weeds. Use 2,4-D only on grasses specified by the manufacturer's label. Follow manufacturer's label when handling or spraying 2,4-D to prevent drift.

#### **EFFECT OF RAIN ON TREATMENT**

Apply this product during a period when rain is not expected for 12 hours after treatment. Since this product is water-soluble, rain will wash the chemical off the leaf blade before absorption occurs. Once this product is absorbed, rain has no effect on performance.

#### WHERE TO USE THIS PRODUCT

Use this product on good Turf, three or more years old, that needs frequent mowing and areas difficult to mow. This product will improve the safety of mowing by reducing the need for frequent mowing of hazardous locations and eliminating mowing of cuts and frills where a seasonal growth from 6 to 11 inches can be tolerated.

#### CONDITIONS AFFECTING ABSORPTION OF THIS PRODUCT BY GRASS

It has been found that a greater amount of this product will enter the leaf in the shortest time and give the best results when the plants are growing rapidly in moist soil. This product is not absorbed under the following conditions:

- 1. When leaves are wilted.
- 2. During periods of extended drought and when the soil is dry.

#### NOTE

At label specified application rates, this product does not normally affect the color of the grass. Under conditions of optimum absorption, color modification for a period of several weeks may be encountered. At times, treated grass may be a greener color than untreated grass. It may also remain greener for a longer period under drought conditions. No adverse effects on color have been observed from a Fall application. Some delay in Spring "green up" is normal.

#### STORAGE AND DISPOSAL

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

**STORAGE:** Store under lock and key in a ventilated room and secure from access by unauthorized persons and children. Store 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 including 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:** To avoid wastes, use all materials in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often, such programs are run by State or local governments or by industry).

#### **CONTAINER HANDLING:**

Nonrefillable Container (rigid material; ≤ 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 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 believed adequate and reliable. Follow directions carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials or the manner of use or application, all of which are beyond the control of the Manufacturer of Seller. All such risks shall be assumed by the user or Buyer.

To the extent consistent with applicable law, Manufacturer or Seller makes no other warranties, expressed or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. To the extent consistent with applicable law, in no case shall the Manufacturer or Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

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