

PM 22 19713-20

file 19711



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

JAN 28 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

BARBARA BROWN
DREXEL CHEMICAL COMPANY
BOX 9306
MEMPHIS, TN. 38109

Subject: Label Amendment Submission of 7/22/93 In Response to PR Notice 93-7
EPA Reg. No. 19713-20
SUPER SUCKER-STUFF LIQUID GROWTH RETARDENT

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



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Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

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Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- **BEFORE** selling or distributing any product bearing the final printed labeling as amended

AND

- **WITHIN** one year from date of this acceptance.

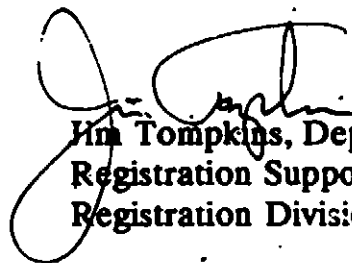
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final labeling may be made to:

**Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202**

Sincerely,



**Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)**

Attachment

cc: Office of Compliance Monitoring

5011

DREXEL

SUPER SUCKER-STUFF

Liquid Growth Retardant for Preventing Growth of Tobacco Suckers

ACTIVE INGREDIENTS:

Potassium salt of 6-hydroxy-3-(2H)-pyridazinone*	21.6%
INERT INGREDIENTS:	78.4%
TOTAL:	100.0%

*Hereafter called potassium salt of maleic hydrazide.
Product contains 1.5 pounds maleic hydrazide equivalent per gallon.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

**SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS
READ ENTIRE LABEL BEFORE USING PRODUCT**

EPA REG. NO. 19713-20
EPA EST. NO. 19713-TN-1
NET CONTENTS:

MANUFACTURED BY:
DREXEL CHEMICAL COMPANY
P.O. BOX 9306
MEMPHIS, TN 38109

11/15/88
Revisions 7, . . .

STATEMENT OF PRACTICAL TREATMENT
IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.
IF IN EYES: Immediately flush eyes with plenty of water. Get medical attention if irritation persists.
IF ON SKIN: ~~Immediately remove contaminated clothing, INCLUDING SHOES,~~ and wash skin with soap and plenty of water. If irritation develops, send for a physician.

ACCEPTED
with COMMENTS
in EPA Letter Dated
JUN 28 1994
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-20

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION. Harmful if swallowed. Avoid breathing of spray mist. Avoid contact with skin, eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE):
 Handlers who may be exposed to the dilute through application or other tasks must wear:
 Long-sleeved shirt and long pants
 Shoes plus socks

Handlers who may be exposed to the concentrate through mixing, loading, application or other tasks must wear:
 Long-sleeved shirt and long pants
 Shoes plus socks
 Waterproof gloves

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.

USER SAFETY RECOMMENDATIONS
 Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
 Remove clothing 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

For terrestrial uses, do not apply directly to water or 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.

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, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and 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. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Personal Protective Equipment required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soils or water is:

Coveralls
Waterproof gloves
Shoes plus socks

TO PREVENT SUCKER DEVELOPMENT ON FLUE-CURED, BURLEY, DARK-FIRE, MARYLAND AND CIGAR (PENNSYLVANIA AND WISCONSIN) TOBACCO: SUPER 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 SUPER SUCKER-STUFF is absorbed and moves inside the tobacco plant, spraying the whole plant is not necessary. Best results are obtained by spraying the upper 1/3 to 1/2 of the plant. It is very important to apply equal amounts of SUPER SUCKER-STUFF to each plant at the correct time to obtain satisfactory control.

Do not make more than one application per season.
Do not harvest earlier than 7 days after application.

WHEN TO SPRAY FOR FLUE-CURED, BURLEY, DARK-FIRE AND MARYLAND 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 SUPER SUCKER-STUFF uniformly onto the entire field within 24 hours after topping (see Notes 1-9).
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 SUPER SUCKER-STUFF within 24 hours after topping (see Notes 1-9). Tip leaves to be harvested should be at least 6 inches long at time of spraying.

FOR PENNSYLVANIA CIGAR TOBACCO:

1. If your field flowers uniformly:
 - a. Top when about 1/4 to 1/2 of your plants show one or more open flowers on each head.
 - b. Wait three days after topping.
 - c. Spray SUPER SUCKER-STUFF For best results, SUPER STUCKER-STUFF should be sprayed on dry or nearly dry leaves. Avoid spraying on leaves covered with dew.
2. If your field doesn't flower uniformly:
 - a. When flowering in your field is particularly uneven, you should top when about 50-60% 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 two inches long.
 - c. Spray SUPER SUCKER-STUFF over your entire field.

FOR WISCONSIN 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: SUPER SUCKER-STUFF may be applied with either 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 1/3 to 1/2 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 up and down motion of spray nozzle to moisten upper 6-8 leaves of each plant. Apply equal amounts of spray to each plant.

AMOUNT OF SPRAY: Apply the recommended amounts of SUPER SUCKER-STUFF in 20-50 gallons of water per acre, do not use less than 20 gallons of water per acre.

FOR FLUE-CURED, BURLEY, CIGAR (PENNSYLVANIA, WISCONSIN) AND MARYLAND TOBACCO: Apply 1.5 pints of SUPER SUCKER-STUFF per 1000 plants. **EXAMPLE:** Use 1.5 gallons SUPER SUCKER-STUFF for 8000 plants per acre.

FOR DARK TOBACCO: Apply 3.0 pints of SUPER SUCKER STUFF per 1000 plants. **EXAMPLE:** Use 3.0 gallons SUPER SUCKER-STUFF for 8000 plants per acre.

SHAKE WELL BEFORE USING.

NOTES:

1. To control tobacco suckers apply SUPER SUCKER-STUFF 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 type of spray).
7. Closely hand suckered or SUPER SUCKER-STUFF treated tobacco will not ripen as rapidly as poorly suckered tobacco. Also, under some conditions SUPER SUCKER-STUFF treated tips have a tendency to turn yellow prematurely. This is not harmful and does not mean that your tobacco is ripe. Therefore, do not harvest SUPER SUCKER-STUFF treated tobacco 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.
 - b) Change in apparent leaf texture.
8. If tobacco plants have been grown under drought conditions absorption of SUPER SUCKER-STUFF will be slow and results may not be as good as plants grown under more favorable moisture conditions.
9. Too little SUPER SUCKER-STUFF will result in less than desired control. Too much is wasteful and may cause burning of leaves and may reduce quality of tips.
10. It is not corrosive to spray equipment. Avoid drift onto nearby crops.
11. Rinse spray equipment with water after application. Do not contaminate water supplies by cleaning of equipment or disposal of wastes.
12. Should wash off occur within 6 hours a single repeat application may be made.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **STORAGE INSTRUCTIONS:** 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 heat or ignition source. Do not stack 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 container 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 saw dust, clay granules or dirt.
2. Collect and place in suitable containers for disposal.
3. Wash area with water and soap 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 run off to enter sewer or contaminate water supplies.
7. Dispose of waste as follows:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or, puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Drexel or the Seller be liable for consequential, special or indirect damages resulting from the use of handling of this product when such use and/or handling is not

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in strict accordance with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.