Messe read instructions on reverse before		5-18-2	-004	arra Anaround	OMB No. 20	70.0086	). Approval expires 2-28-9
CEPA Environmental Protection Age Weshington, DC 20460			ncy Re		Registrati Amendm Other	on	OPP Identifier Number
	Applicati	on for Pe	sticide	- Section	ł .		
1. Company/Product Number 19713-20			EPA Product Manager     Cynthia Giles-Parker			3. Proposed Classification  None Restricted	
4. Company/Product (Name) DREXEL SUPER SUCKER-STUFF		22/Fungicide Branch					
5. Name and Address of Applicant (Include  Drexet Chemical Company, P.O.	6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:						
MEMPHIS, TN 38113-0327  Check if this is a new addra	Product Name						
		Sectio					• • • •
Amendment - Explain below.  Resubmission in response to Agency  Notification - Explain below.		Final printed labels in repsonse to Agency letter dated "Me Too" Application.  Other - Explain below.  MAY 1-8 2004					
submission. The required certification statem	ent is also submitted.	Section	n - (()				• • • • •
1. Material This Product WIII Be Peckaged in	n:						
Child-Resistant Packaging  Yes  No  * Certification must be submitted  Unit Packaging  Unit Packaging  Yes  No  If "Yes" Unit Packaging	Weter Soluble Packaging.  Yes  No  If "Yes" Package wgt container  2. Type of the container				f Container  Metal Plestic Glass Paper Other (Specify)		
3. Location of Net Contents Information  Lebel Container	4. Size(s) Re	l etail Container		5. Lo	cation of Label	Directio	ns
<ol><li>Manner in Which Label is Affixed to Prod</li></ol>		graph r glued xiled		Other	· · · · · · · · · · · · · · · · · · ·		<del> </del>
		Section	- IV				
1. Contact Point (Complete items directly b	elow for identificati	on of individue	l to be con	tected, if nece	esery, to proc	ees this	epplication.)
Name LUZ G CHAN	Tide REGISTRATION MANAGER			1	Telephone No.,((n)/vide Area Code) (901) 774-4370 carro		
I certify that the statements I have me I ecknowledge that any knowlingly fa both under applicable law.	Certifica ede on this form enc slee or misleeding st	d all attachmen	nts thereto ne punishal	ere true, eccu ble by fine or i	rate and comp	léte.	6. Date Application Received : (Stamped)
2. Signature Cuz a Chan	3. Title REGISTRATION MANAGER						
4. Typed Name LUZ G CHAN	5. Date April 23, 2004					**************************************	



2/5

NOTIFICATION
MAY 1 8 2004

April 23, 2004

Submission of Revised Label per PR Notice 95-1
DREXEL SUPER SUCKER-STUFF (EPA Reg. No. 19713-20)

This notification is consistent with the Provisions of PR Notice 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

FOR DREXEL CHEMICAL COMPANY

**ULUZ G CHAN**Registration Manager

# Super Sucker-S

Liquid Growth Retardant

For preventing growth of Tobacco suckers

#### **ACTIVE INGREDIENT:**

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

<sup>&#</sup>x27;Hereafter called Potassium salt of maleic hydrazide.

## KEEP OUT OF REACH OF CHILDREN CAUTION

See FIRST AID Below SHAKE WELL BEFORE USING

EPA Reg.No. 19713-20 EPA Est. No. 19713-TN-1

**Net Contents:** 

#### **FIRST AID**

#### IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- . Have person sip a glass of water if able to swallow.
- . Do not induce vomiting unless told to do so by a poison control center or
- . 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

#### 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.

#### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing.
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. (Continued)

### PRECAUTIONARY STATEMENTS (Cont.)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, shoes plus socks and chemical resistant gloves made of any waterproof material such as polyathylene or polyvinyl chloride.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and not water. Keep and wash PPE separately from the 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 immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) Remove PPE immediately atter handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean cloth-

#### **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.

SURFACE WATER ADVISORY: Under some conditions, this product may have a significant potential for runoff into surface water (primarily via dissolution in runoff water) for several days postapplication. Conditions favoring runoff include poor draining soils or wet soils with readily visible slopes, frequently flooded areas, areas where an intense or sustained rainfall is forecast to occur within 48 hours, areas overlying extremely shallow groundwater and areas overlying tiles drainage systems that flow to surface

#### **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.

> Manufactured By: **Drexel Chemical Company** P.O. BOX 13327, MEMPHIS, TN 38113-0327 SINCE 1972

This product contains 1.5 pounds of Maleic hydrazide equivalent per

#### 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.

## TO PREVENT SUCKER DEVELOPMENT ON FLUE-CURED, BURLEY, DARK-FIRE, MD AND CIGAR (PA AND WI) 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 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 % to ½ 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.

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 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 early maturing plants and spray this product uniformly onto
   the entire field within 24 hours after topping (see notes 1-9).
- If there is a wide range in the time of flowering, the following procedures 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 1-9). Tip leaves to be harvested should be at least 6 inches long at time of spraying.

#### FOR PA CIGAR TOBACCO

- If your field flowers uniformly:
  - a. Top when about ¼ to ½ 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 doesn't flower uniformly:
  - a. When flowering in your field is particularly uneven, you should top when about 50% to 60% of the plants show one or more open flowers per head.
  - b. Wait three days after topping and remove, by hand, any suckers more than two inches long.
  - c. Spray this product over your entire field.

#### FOR WI CIGAR TOBACCO

- 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 sprayer: 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 % to ½ of plant.
- Compressed-air shoulder sprayer: with single nozzle spraying a wide cone spray on one side of each Tobacco row while walking at a constant rate. Use up and down motion of spray nozzle to moisten upper 6 to 8 leaves of each plant. Apply equal amounts of spray to each plant.

#### AMOUNT OF SPRAY

Apply the recommended amounts of this product in 20 to 50 galtons of water per acre, do not use less than 20 gallons of water per acre.

## FOR FLUE-CURED, BURLEY, CIGAR (PA AND WI) AND MD TOBACCO Apply 1½ pints of this product per 1,000 plants.

EXAMPLE: Use 1½ gallons of this product for 8,000 plants per acre. FOR DARK TOBACCO

Apply 3 pints of this product per 1,000 plants.

EXAMPLE: Use 3 gallons of this product for 8,000 plants per acre-

#### Notes:

- To control Tobacco suckers, apply this product at the proper time. Too early spraying 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, this 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.
- 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 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 mid-rib.
  - b) Change in apparent leaf texture.
- 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.
- This product is not corrosive to spray equipment. Avoid drift onto nearby crops.
- Rinse spray equipment with water after application. Do not contaminate water supplies by cleaning of equipment or disposal of wastes.
- 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 and disposal. **PESTICIDE STORAGE:** Storage should be under lock and key in a ventilated room and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from 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 containers tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original containers only. If the contents are leaking or material is spilled, follow these steps:

- 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.
- Place a leaking container in a plastic tub and transfer contents, as soon as possible, to an empty, original container.
- Do not allow runoff to enter sewer or contaminate water supplies.
   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 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.





5/5

April 23, 2004

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Rm 266A, Crystal Mall 2
1921 Jefferson Davis Hwy.
Arlington, VA 22202

Re: Submission of Revised Label by Notification per PR Notice 95-1 DREXEL SUPER SUCKER-STUFF (EPA Reg. No. 19713-20)

#### Herewith:

- 1. Completed EPA Form 8570-1.
- 2. One (1) copy of the revised label (20SP-0404++). The following is the change made on the label:
  - i) In the Environmental Hazards section, the paragraph, "Note: Add this statement to all container sizes..........Office of the EPA." was deleted. Per PR Notice 95-1, this only applies to end-use products registered for industrial preservative, water treatment, other industrial processing uses and commercial and institutional uses.
- 3. Certification Statement per PR Notice 98-10

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

Thank you.

Respectfully yours,

FOR DREXEL CHEMICAL COMPANY

Luz G Chan

Registration Manager

1700 Channel Avenue • Post Office Box 13327 • Memphis, Tennessee 38113-0327

Phone: (901) 774-4370 • Fax: (901) 774-4666 • E-Mail: info@drexchem.com • www.DrexChem.com