

19713-20 6.26.2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

JUN 26 2007

SUBJECT: Applications for Pesticide Notification – Update Warranty, First Aid, User Safety Recommendations, Trademark, and Other Minor Labeling Changes

Drexel Drexar™ 530; Application Dated April 30, 2007	EPA Reg. No. 19713- 40
Drexel Atrazine 4L; Application Dated May 1, 2007	EPA Reg. No. 19713- 11
Drexel Leven-38®; Application Dated May 1, 2007	EPA Reg. No. 19713-105
Drexel Diuron Technical, Application Dated May 4, 2007	EPA Reg. No. 19713- 66
Drexel Defol 5®; Application Dated May 7, 2007	EPA Reg. No. 19713-388
Drexel Trizmet™ II; Application Dated May 7, 2007	EPA Reg. No. 19713-547
✓Drexel Super Sucker-Stuff®; App. Dated May 10, 2007	EPA Reg. No. 19713- 20

Dear Ms. Chan:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10. The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The labels submitted with the applications have been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



Drexel Chemical Company

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May 10, 2007

NOTIFICATION

JUN 26 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac yard
2777 S. Crystal Drive
Arlington, VA 22202
(Tel. 703 305-6470)

**Re: Submission of Revised Label by Notification per PR Notice 98-10
DREXEL SUPER SUCKER-STUFF (EPA Reg. No. 19713-20)**

Herewith:

1. Completed EPA Form 8570-1
2. One (1) copy of the label (20SP-0507) with the following revisions:
 - i) The National Pesticide Information Center contact number was added.
 - ii) The word "exist" was added after "washables" under "Personal Protective Equipment (PPE)"
 - iii) Under 'User Safety Recommendations', 'clothing' was changed to 'clothing/PPE'
 - iv) Under "Environmental Hazards", "For terrestrial uses" was deleted. The sentence now reads "Do not apply.....water mark."
 - v) Recommendations in fractions were changed to decimals.
 - iv) The warranty statement was updated to add "To the extent consistent with applicable laws" before "Buyer assumes....." and "In no case....."

I highlighted all the changes for easy reference.

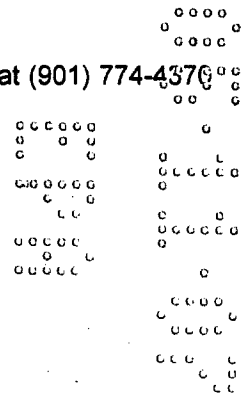
3. Certification Statement

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

Thank you.

Respectfully yours,
FOR DREXEL CHEMICAL COMPANY

Luz G. Chan
Luz G Chan
Registration Manager



	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 19713-20	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL SUPER SUCKER-STUFF	PM# 22/Fungicide Branch	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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NOTIFICATION

JUN 26 2007


Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of revised label (20SP-0507). Details are in the cover letter accompanying this submission. The required certification statement is also submitted.
 Thank you.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name LUZ G CHAN	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date May 10, 2007	

NOTIFICATION
JUN 26 2007

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Drexel

Super Sucker-Stuff®

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%

*Hereafter called Potassium salt of maleic hydrazide. This product contains 1.5 pounds of Maleic hydrazide equivalent per gallon.

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-001 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 doctor.
- Do not give anything by mouth to an unconscious or convulsing person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: 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.

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 polyethylene or polyvinyl chloride.

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.

(Continued)

SUCKER-STUFF is a registered trademark of Drexel Chemical Company.

PRECAUTIONARY STATEMENTS (Cont.)

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 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 post-application. 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 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.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972

20SP-0507

SUPER SUCKER-STUFF Page 1 of 2

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 one-third to one-half of the plant. It is very important to apply equal amounts of this product to each plant at the correct time to obtain satisfactory control. 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

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 this product uniformly onto the entire field within 24 hours after topping (see notes 1 to 9).
2. 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 to 9). Tip leaves to be harvested should be at least 6 inches long at time of spraying.

FOR PA CIGAR TOBACCO

1. If your field flowers uniformly:
 - a. Top when about one-fourth to one-half of your plants show one or more open flowers on each head.
 - b. Wait three days after topping.
 - c. Spray this product. For best results, this product should be sprayed on dry or nearly dry leaves. Avoid spraying on leaves covered with dew.
2. If your field 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

1. Top the field when most of the plants in your field are in full flower.
2. Remove, by hand, any suckers larger than one or two inches.
3. Spray within 24 hours after topping and removal of suckers.

HOW TO SPRAY

This product may be applied with either a tractor-drawn insecticide sprayer or with a compressed-air shoulder sprayer.

1. **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 one-third to one-half of plant.
2. **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 gallons 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 1.5 pints of this product per 1,000 plants.

EXAMPLE: Use 1.5 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:

1. 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.
2. 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.
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 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.
8. If Tobacco plants have been grown under drought conditions, absorption of this product will be slow and results may not be as good as plants grown under more favorable moisture conditions.
9. Too little of this product will result in less than desired control. Too much is wasteful and may cause burning of leaves and may reduce quality of tips.
10. This product is not corrosive to spray equipment. 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 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:

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 a 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 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—CONDITIONS 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. To the extent consistent with applicable laws, 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 laws, 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.

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Drexel Chemical Company

May 10, 2007

NOTIFICATION

JUN 26 2007

Submission of Revised Label per PR Notice 98-10
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

LUZ G. CHAN

Registration Manager

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