

PM 25 19713-35

July 1993



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

Barbara Brown  
DREXEL CHEMICAL COMPANY  
P.O. BOX 9306  
MEMPHIS, TN. 38109

FEB 10 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 7/22/93 In Response to PR Notice 93-7  
EPA Reg. No. 19713-35  
SUCKER-PLUCKER CONCENTRATE TOBACCO SUCKER CONTROL

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 reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (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 not been reviewed or 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:**

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



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

2079

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 printed 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

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Barbara Brown  
DREXEL CHEMICAL CO  
BOX 9306  
MEMPHIS TN 38109

Comment for: EPA Reg Nr.19713-35  
SUCKER-PLUCKER CONCENTRATE TOBACCO SUCKER CONTROL

The following specific comments pertain to your WPS  
labeling submission concerning the product  
cited above:

Delete the crossed-out statements on your proposed label.  
They are redundant statements or phrases.

Correct the typographical errors circled on your proposed  
label.

**DREXEL  
SUCKER PLUCKER<sup>®</sup>  
CONCENTRATE**

**Tobacco Sucker Control Agent**

**ACTIVE INGREDIENTS\*:**

Fatty Alcohols.....85.0%  
(C<sub>6</sub>-0.42%, C<sub>8</sub>-38.68%, C<sub>10</sub>-45.90%)

INERT INGREDIENTS:.....15.0%

TOTAL:.....100.0%

\* Weight of active ingredients is 6.04 pounds per gallon.

Derived from a fatty alcohol mixture that typically contains  
(C<sub>6</sub>-0.5%, C<sub>8</sub>-42.0%, C<sub>10</sub>-56.0%, C<sub>12</sub>-1.5%) linear alcohols.

**KEEP OUT OF REACH OF CHILDREN  
WARNING - AVISO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

EPA Reg. No. 19713-35  
EPA Est. NO. 19713-TN-1

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 10 1994

Manufactured By:  
Drexel Chemical Company  
P.O. Box 9306, Memphis, Tenn. 38109-0306

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
is submitted for the pesticide  
registered under EPA Reg. No.  
19713-35

Revisions 7/93

**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 with plenty of water. Get medical attention if irritation persists.  
**IF ON SKIN:** Immediately flush skin with plenty of soap and water while removing contaminated clothing and shoes. If irritation develops, seek medical attention.  
**IF INHALED:** Remove victim to fresh air.

**BEST AVAILABLE COPY**

**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING:** Causes substantial but temporary eye injury. Do not get in eyes, on skin, or on clothing. Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing spray mist.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators and other handlers must wear:

Coveralls over short-sleeved shirt and short pants

Waterproof gloves

Protective eyewear

Chemical-resistant footwear plus socks

Chemical-resistant headgear for overhead exposure

Chemical-resistant apron when cleaning equipment, mixing or loading.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

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 used for irrigation or domestic purposes. Do not contaminate water by cleaning of equipment or disposal of wastes.

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**GENERAL INFORMATION**

SUCKER-PLUCKER CONCENTRATE is a carefully balanced combination of active ingredients and wetting agents (surfactants) to be used for the control of sucker growth on burley, flue-cured and dark tobacco. The concentrated product is diluted with water to form a creamy emulsion which is applied as a coarse spray. The emulsion is effective only when it comes in direct contact with the suckers; therefore, the material is applied so that maximum contact is made with the suckers. SUCKER-PLUCKER CONCENTRATE can be used alone, or can be followed by a systemic sucker control agent in a dual treatment program on flue-cured or burley tobacco.

**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 24 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 over short-sleeved shirt and short pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

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**TIME OF APPLICATION**

SUCKER-PLUCKER CONCENTRATE can be applied either before or after topping at the button to early flower stage. However, best results are usually obtained by spraying the tobacco with SUCKER-PLUCKER CONCENTRATE before topping and then topping within a week, removing any suckers that were missed. Topping can be done one to two days before spraying. At the same time remove any suckers over one inch in length and straighten any plants that are leaning so that the emulsion flows down the stalk evenly and makes the necessary contact with each sucker. SUCKER-PLUCKER CONCENTRATE can be applied anytime during the day until about 7:30 p.m., however, best results are obtained when plants are sprayed in the morning after the dew has dried or in the afternoon when the plants have recovered from wilt. Some injury to the tender leaves at the top of the plant may result from the application of SUCKER-PLUCKER CONCENTRATE under bright sunlight at temperatures above 90°F. Injury may also result if SUCKER-PLUCKER CONCENTRATE is applied to the underside of the tobacco leaf; thus, application in winds high enough to turn over the top leaves is not recommended. Do not apply during rain or to wet plants. However, if the material has been on the plants over an hour before a rain or irrigation, reapplication should not be necessary.

**NUMBER OF APPLICATIONS**

In many cases a single application of SUCKER-PLUCKER CONCENTRATE is satisfactory to control both primary and secondary suckers. If secondary sucker growth appears vigorous, a second treatment on flue-cured or burley tobacco 3 to 7 days after the initial treatment may be advantageous. Excellent leaf quality can be obtained with the use of SUCKER-PLUCKER CONCENTRATE alone in one or, where necessary, two applications. Some growers favor a dual treatment using SUCKER-PLUCKER CONCENTRATE first (at the button stage) followed 1 to 2 weeks later with a systemic sucker control agent (maleic hydrazide) used in accordance with manufacturer's instructions. If this dual treatment method is used, an application rate of 1 1/2 to 2 gallons of SUCKER-PLUCKER CONCENTRATE per 50 gallons of spray solution is adequate.

**RATE OF APPLICATION**

For use on flue-cured and burley tobacco, SUCKER-PLUCKER CONCENTRATE should be diluted at the rate of 4 to 5 ounces per gallon of water or 1 3/4 to 2 gallons per 50 gallons of spray solution. For flue-cured tobacco, rate may be increased to 2 1/2 gallons per 50 gallons of spray solution for the second application about 3 to 5 days following the first application unless plants are tender. When using SUCKER-PLUCKER CONCENTRATE on dark tobacco 7 to 8 ounces per gallon of water, or 2 1/2 to 3 1/2 gallons per 50 gallons of spray solution, should be used. Use the lower rates when optimum growing conditions exist and leaves are tender. When applied by hand, 1 gallon of diluted SUCKER-PLUCKER CONCENTRATE will treat approximately 250 plants.

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If a power sprayer is used, 50 gallons of diluted product should be applied per acre of tobacco.

#### METHOD OF APPLICATION

The diluted emulsion is most easily prepared by adding the required amount of SUCKER-PLUCKER CONCENTRATE to your spray tank and then adding the water. In order to obtain the best results, it is important that the water be added to the SUCKER-PLUCKER CONCENTRATE rather than the SUCKER-PLUCKER CONCENTRATE to the water.

If you use a hand-held or back pack sprayer, the diluted emulsion should be applied at a rate of  $\frac{2}{3}$  to 1 ounce per plant (or enough to insure run down to the bottom of the plant.) A coarse spray is recommended, directed downward at the top of the stalk from 6 to 8 inches above the top leaves. Very little tank pressure is required, and in no case should more than about 20 lbs. be used. When applied with power equipment, three nozzles per row should be used (TG-3 full cone tips, or equivalent are recommended). One nozzle should be directed downward over the center of the row and one should be 9 inches on either side directed at or slightly above the top of the stalk. The diluted SUCKER-PLUCKER CONCENTRATE should be applied to the topped tobacco as a coarse spray from a height of 12 to 16 inches above the top of the stalk. It is recommended that boom pressure be kept at 20 to 25 lbs. and should never exceed 30 lbs. By using the recommended spray tips, spraying at 20 to 25 lbs. pressure, and operating at a tractor speed of  $2\frac{1}{2}$  to 3 mph, you will apply approximately 50 gallons of diluted emulsion per acre of tobacco.

If allowed to stand for extended periods of time, the diluted emulsion may separate. Always remember to mix well immediately before using. In order to minimize the possibility of injury to the tobacco plants, do not mix SUCKER-PLUCKER CONCENTRATE with other chemicals such as insecticides or herbicides, or apply SUCKER-PLUCKER CONCENTRATE to plants which have recently been treated with such chemicals. Be sure that all spray equipment has been carefully rinsed out prior to using. In burley tobacco, during prolonged periods of high heat and humidity or under other conditions which might favor the spread of hollow stalk or stem rot diseases, delay application of SUCKER-PLUCKER CONCENTRATE until these conditions pass.

#### 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 any heat or ignition source. Do not stack plastic 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 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. Avoid contamination with oxidizing materials. Store in original containers only. If the contents are leaking or material is spilled follow these steps:

1. Contain spill, absorb with a material such as 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 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 indicated below:

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

**CONTAINER DISPOSAL:** Metal - triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Plastic Containers - triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or 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 or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a conditions of sale by Drexel Chemical Company and is accepted as such by the Buyer.

SUCKER-PLUCKER is a registered trademark of Drexel Chemical Company

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