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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAR 30 2001

Ms. Luz G. Piwonka
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-0327

Dear Ms. Piwonka:

Subject: Labeling Amendment to Comply With North Carolina Recommendations
Drexel Sucker Plucker Concentrate
EPA Reg No 19713-35
Your Correspondence Dated October 26, 2000 and February 27, 2001

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling before you release the product for shipment.

For future submissions, please submit a label that complies with PR Notice 2000-3 (First Aid Statements). In addition, please submit "clean" labels; that is, labels with no words crossed (strikeouts) or similar.

If you have any questions regarding this letter, do not hesitate to contact me at (703) 305-7740 or María I. Rodríguez of my staff at (703) 305-6710.

Sincerely yours,

BP
Cynthia Giles-Parker
Product Manager #22
Fungicide Branch
Registration Division (7505C)

Enclosure

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Sucker-Plucker[®]

Concentrate

Tobacco Sucker Control Agent

ACTIVE INGREDIENT:

Fatty alcohols (0.5% C ₆ , 42.0% C ₈ , 56.0% C ₁₀ , 1.5% C ₁₂)	85.0%
OTHER INGREDIENTS:	15.0%
TOTAL:	100.0%

This product contains 6.04 pounds of active ingredients per gallon.

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 the label, find someone to explain it to you in detail.)

See **FIRST AID** Below
SHAKE WELL BEFORE USING

EPA Reg. No. 19713-35
EPA Est. No. 19713-GA-1 Net Contents: _____

FIRST AID

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. If irritation develops, seek medical attention.

IF INHALED: Remove victim to fresh air.

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 and 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

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 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 when disposing of equipment washwaters.

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. This product 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 (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 24 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 over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure.



Manufactured By:
Drexel Chemical Company

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

SINCE 1972

TIME OF APPLICATION

This product may be applied either before or after topping at the button to early flower stage. However, best results are usually obtained by making the first contact application to spraying the Tobacco with this product before topping, as soon as 50 to 60 percent of the plants have a visible button. The floral parts help to intercept sprays to increase sucker kill in the upper leaf axils. Top plants that are ready for topping as soon as possible after first application. This product is usually more effective if applied 3 to 5 days apart when humidity is low and leaf axils are fully exposed — that is, generally between 10:00 A.M. and 6:00 P.M. on sunny days, except when the plants are wilted and temperatures exceeds 90°F. ~~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. This product may 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 this product under bright sunlight at temperatures above 90°F. Injury may also result if this product 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 this product 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 this product alone in one or, where necessary, two applications. Some growers favor a dual treatment using this product 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 1½ to 2 gallons of this product per 50 gallons of spray solution is adequate.

RATE OF APPLICATION

For use on Flue-cured and Burley tobacco, the first application of this product should be diluted at the rate of 4 to 5 ounces per gallon of water or 1¼ to 2 gallons per 50 gallons of spray solution. For Flue-cured tobacco, the rate of this product for the second application may be increased to 2½ gallons per 50 gallons of spray solution for the second application, about 3 to 5 days following the first application, unless plants are tender. For extended sucker control, this product may be applied as needed at the rate of 2½ gallons per 50 gallons of spray solution 3 to 4 weeks after maleic hydrazide has been applied. When using this product on Dark tobacco, 7 to 8 ounces per gallon of water or 2½ to 3½ 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 this product, diluted, will treat approximately 250 plants. If a power sprayer is used, 50 gallons of diluted spray solution should be applied per acre of Tobacco.

METHOD OF APPLICATION

The diluted emulsion is most easily prepared by adding the required amount of this product 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 product rather than the product to the water.

If you use a hand-held or backpack sprayer, the diluted emulsion should be applied at a rate of ¾ to 1 ounce per plant (or enough to ensure 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 pounds be used. When applied with power equip-

ment, three nozzles per row should be used (TG-3 full cone tips, TG-5, TG-3 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 product 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 pounds and should never exceed 30 pounds. By using the recommended spray tips, spraying at 20 to 25 pounds pressure, and operating at a tractor speed of 2½ 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 this product with other chemicals such as insecticides or herbicides, or apply this product 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 this product until these conditions pass.

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 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 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 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: 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 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.

