

19713-35

03/13/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms Luz G Chan
Drexel Chemical Company
PO BOX 13327
Memphis, TN 38113-0327

MAR 13 2009

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4 and 98-10
Storage & Disposal and Other Changes

Dear Registrant:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 and 98-10 dated January 27, 2009 for:

EPA Registration 19713-35 Drexel Sucker-Plucker Concentrate

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and 98-10, and finds that the label change(s) requested falls within the scope of PRN-2007-4 and 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Banza Djapao of my staff at 703-305-7269.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

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

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United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-35	2. EPA Product Manager TONY KISH	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL SUCKER-PLUCKER CONCENTRATE	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. <u>NOTIFICATION</u> Product Name <u>MAR 13 2009</u>	

Section - II

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

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

Submission of revised label (35SP-0109*) per PR Notice 2007-4 and minor label updates per PR Notice 98-10. Thank you.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* 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 checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2.5, 5, 10, 15, 30, 55 gal; Bulk, Tote		5. Location of Label Directions <input type="checkbox"/> On the label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued 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 <i>Luza Chan</i> 2009.01.27 11:45:04 -06'00'	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date January 27, 2009	



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Drexel Chemical Company

January 27, 2009

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202

**Re: Submission of Revised Label per PR Notice 2007-4 and PR Notice 98-10 by
Notification - DREXEL SUCKER-PLUCKER CONCENTRATE (EPA Reg. No. 19713-35)**

Herewith:

1. Completed EPA Form 8570-1
2. One copy of the label (35SP-0109*) with a revised storage and disposal statements adopted exactly from Appendix B and Appendix C of PR Notice 2007-4.

Also, we made the following label updates to meet EPA's label current standards:

- i) Under the warranty statement, the first sentence was revised to read "OUR DIRECTIONS FOR USE.....carefully. Also, "To the extent consistent with applicable law" was added before "Buyer assumes....." and "In no case....."

The changes were highlighted for easy reference.

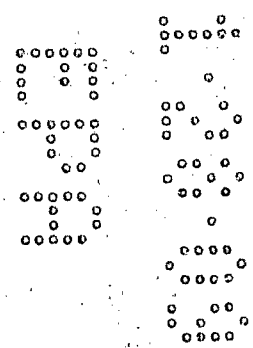
3. Certification Statements

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 Chan
Registration Manager





Drexel Chemical Company

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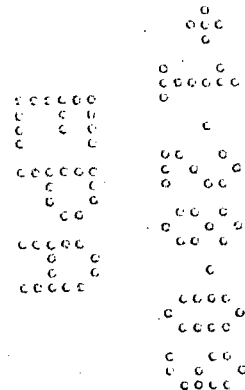
January 27, 2009

Submission of Revised Label per PR Notice 2007-4
DREXEL SUCKER-PLUCKER CONCENTRATE (EPA Reg. No. 19713-35)

This notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA Regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. 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 requirements of 40 CFR 156.10, 156.140, 156.144, and 156.146 and 156.156, 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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Sucker-Plucker[®]

Concentrate

Tobacco Sucker Control Agent

ACTIVE INGREDIENTS:

Fatty alcohols (0.5% C₆, 42.0% C₈,
56.0% C₁₀, 1.5% C₁₂) 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-XX-XXX Net Content: _____

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes.
IF INHALED:	<ul style="list-style-type: none"> • 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.
<p>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.</p>	

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.

NOTIFICATION

MAR 13 2009



Manufactured By:
Drexel Chemical Company

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

SINCE 1972

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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.

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 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 exceed 90°F. 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 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 1.75 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 2.5 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 2.5 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 2.5 to 3.5 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 0.66 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 per square inch (psi) be used. When applied with power equipment, *three nozzles per row* should be used (TG-3, TG-5 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 psi and should never exceed 30 psi. By using the recommended spray tips, spraying at 20 to 25 psi pressure and operating at a tractor speed of 2.5 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:

Nonrefillable Container (rigid material; less than 5 gallons): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid material; 5 gallons or greater): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Containers:

Refillable container. Refill this container with this product only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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WARRANTY—CONDITIONS OF SALE

OUR DIRECTIONS 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 law, 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 law, 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.