



**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

WASHINGTON, D.C. 20460

January 28, 2025

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

Subject: Label Amendment - Registration Review Mitigation for Maleic Hydrazide  
Product Name: DREXEL MH 2.25  
EPA Registration Number: 19713-293  
Application Dates: 02/02/2017 and 01/08/2025  
Decision Number: 525758  
Case Number: 481489

Dear Luz Chan:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Maleic Hydrazide Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Tracy Jackson by phone at 202-566-2268, or via email at [jackson.tracy@epa.gov](mailto:jackson.tracy@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

ENCLOSURE: Stamped label

**ACCEPTED**

Jan 28, 2025

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 19713-293

**Drexel**

***MH 2.25***

Liquid Growth Retardant

**ACTIVE INGREDIENT:**

Potassium salt of 6-hydroxy-3-(2H)-pyridazinone\*..... 30.2%

**OTHER INGREDIENTS:**..... 69.8%

**TOTAL:** ..... 100.0%

\*Hereafter called potassium salt of maleic hydrazide.

This product contains 2.25 pounds of maleic hydrazide equivalent per gallon.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**See FIRST AID Below**

**EPA Reg. No. 19713-293**

**EPA Est. No. 19713-TN-1**

**Net Content: \_\_\_\_\_ Gals. ( \_\_\_\_\_ L)**

**FIRST AID**

**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.
- Call a poison control center or doctor for treatment advice.

**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 person.

**IF ON SKIN OR CLOTHING:**

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

**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 further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call CHEMTREC at 800-424-9300 for emergency [medical treatment information](#).

293SP-0125\*P

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. Harmful if swallowed, absorbed through skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

**Applicators and other handlers must wear:** Long-sleeved shirt and long pants, shoes plus socks and waterproof gloves.

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.

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

For terrestrial uses, do not apply directly to water, 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 or rinsate.

**Surface Water Advisory:** Under some conditions, maleic hydrazide 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 poorly drained 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 tiled 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, waterproof gloves and shoes plus socks.

## **To Prevent Sucker Development on Flue-Cured, Burley, Dark-Fire, MD and Cigar (PA and WI) Tobacco**

MH 2.25, a plant growth inhibitor, offers a 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 amount of this product to each plant at the correct time to obtain satisfactory control.

### **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 procedure 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.

### **When to Spray 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.

### **When to Spray 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 tractor-drawn insecticide sprayer or with a compressed air shoulder sprayer.

1. **Tractor-drawn insecticide sprayers:** Any number of nozzles may be used (See “NOTE 6”). This product can be applied in the same manner as insecticide, spraying one or more rows at a time, wetting upper one-third or one-half of the plant.
2. **Compressed air shoulder sprayer with single nozzle spraying a wide cone:** Spray 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 amount of spray to each plant.

### **Amount of Spray**

Apply the specified amount of this product in 30 to 50 gallons of water per acre. Do not use less than 30 gallons of water per acre.

### **Amount to Use**

Mix 1 to 1.5 gallons of this product (2.25 to 3.375 lb. Maleic Hydrazide) in sufficient water totaling 30 to 50 gallons of water per acre for all types of Tobacco.

## USE RESTRICTIONS

- Do not make more than one application per year on Tobacco. However, a single repeat application of maleic hydrazide may be made if rain occurs within 6 hours of application of this product.

## NOTES

1. To control Tobacco suckers apply this product at the proper time. Spraying too early 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. At 40°F and below the 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.
3. Follow the specified dosage carefully, spray field uniformly and do not use less than the minimum amount of water recommended on Tobacco.
4. Do not use on Tobacco plants grown for seed production.
5. 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 the late afternoon or night applications. (Use a nozzle delivering a fine mist spray. Do not use a broad jet-type of spray).
6. 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 midrib and
  - (b) Change in apparent leaf texture.
7. If Tobacco plants have been growing 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.
8. Using 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.
9. This product is not corrosive to spray equipment.
10. Rinse spray equipment with water after application. Do not contaminate water supplies by cleaning of equipment or disposal of wastes.
11. Allow at least 7 days after application before harvest of Tobacco.
12. Should washoff from rainfall occurs within 6 hours of application to Tobacco, a single repeat application of this product or any other maleic hydrazide containing products may be made.

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or 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 containers 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 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. 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 indicated below.

**PESTICIDE DISPOSAL:** To avoid waste, use all materials in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often, such programs are run by State or local governments or by industry).

### CONTAINER HANDLING:

**Nonrefillable Container (rigid material; ≤ 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 up to < 250 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. 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 Container (≥ 250 gals. & Bulk):** Refillable container. Refill this container with pesticide 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.

## **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.



The Drexel logo is a registered trademark of Drexel Chemical Company.