



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 19713-361	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL SUCKER-STUFF 80-G	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 checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____	<b>NOTIFICATION</b>  MAY 18 2004
<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.)

One (1) copy of the revised label (361SP-0404++) is submitted for your record and file. Details of the change is on 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:						2. Type of Container	
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		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions			
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 <i>Luza Chan</i>	3. Title REGISTRATION MANAGER	
4. Typed Name LUZ G CHAN	5. Date April 23, 2004	



Drexel Chemical Company

2/7

NOTIFICATION

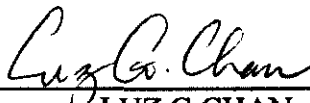
MAY 18 2004

April 23, 2004

***Submission of Revised Label per PR Notice 95-1***  
**DREXEL SUCKER-STUFF 80-G (EPA Reg. No. 19713-361)**

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

MAY 18 2004

Drexel

# Sucker-Stuff 80-G

Water-Soluble Granule Growth Retardant For Preventing Growth of Tobacco Suckers and Sprouting of Potatoes and Onions.

**ACTIVE INGREDIENT:**

Potassium Salt of 6-hydroxy-3-(2H)-pyridazinone\* ..... 80.0%

**OTHER INGREDIENTS:** ..... 20.0%

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

\*Hereafter called Potassium salt of maleic hydrazide. This product contains 80% Maleic hydrazide by weight.

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

See FIRST AID Below

EPA Reg No. 19713-361

EPA Est No. 19713-GA-1

Net Contents:

**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.

**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 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. 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**

**Hazard to Humans and Domestic Animals**

**CAUTION:** Harmful if absorbed through skin. Causes moderate eye injury. Harmful if swallowed. Avoid breathing dust or spray mist. Avoid contact with skin, eyes or clothing. In case of accidental exposure, flush eyes or skin with plenty of water. Call a physician if irritation persists.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Some materials that are chemical-resistant to the product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

**Handlers who may be exposed to the dilute through application or other tasks must wear:** Long-sleeved shirt and long pants, shoes and socks and chemical-resistant gloves such as polyethylene or polyvinyl chloride.

(Continued)

**PRECAUTIONARY STATEMENTS (Con't.)**

**Handlers who may be exposed to the concentrate through mixing, loading, application or other tasks must wear:** Long-sleeved shirt and long pants, chemical-resistant gloves such as polyethylene or polyvinyl chloride and shoes plus socks.

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.

**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 tiles drainage systems that flow to surface water.

**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 by disposal of equipment washwaters.

**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, 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), restricted entry interval (REI) and notification to workers. 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 such as polyethylene or polyvinyl chloride and shoes plus socks.

Manufactured By:

**Drexel Chemical Company**

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

SINCE 1972

## TOBACCO

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

**SUCKER-STUFF 80-G**, 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 can be 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.

### WHEN TO SPRAY 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" 1-9).
2. If there is a wide range in the time of flowering, the following procedure should be used:
  - a. Go through 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" 1-9). 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 with dew.
2. If your field does not flower uniformly:
  - a. When flowering in your field is particularly uneven, you should top when 50% - 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 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 MIX THIS PRODUCT:

1. Fill spray tank to be used two-thirds full of water.
2. Add appropriate amount of this product to be used.
3. This product will rapidly go into solution with minimum agitation.

**HOW TO SPRAY:** This product may be applied with either a tractor-drawn conventional sprayer or with a compressed air shoulder sprayer.

1. **Tractor-drawn sprayer**—Any number of nozzles may be used (see "NOTE" 6). This product can be applied in the same manner as insecticides, spraying one or more rows at a time, wetting the upper one-third to one-half of 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 an 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 30 to 50 gallons of water per acre. DO NOT USE less than 30 gallons of water per acre.

### APPLICATION RATES:

**For Flue-Cured, Burley, Cigar (PA or WI) and MD Tobacco:** Apply 8 to 10 ounces of this product per 1,000 plants.

**EXAMPLE:** Use 4 to 5 pounds of this product per 8,000 plants per acre.

**For Dark Tobacco:** Apply 15 ounces of this product per 1,000 plants.  
**EXAMPLE:** Use 7.5 pounds of this product per 8,000 plants per acre.

### 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. Rains occurring within 6 hours after spraying Tobacco may reduce effectiveness.
3. At 40°F and below, the spray solution may form small solids. It readily redissolves upon warming 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 per acre on Tobacco.
5. Do not use on Tobacco plants grown for seed production.

- 4/17
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 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 by using time and the color of the leaves as your only guide to ripeness. Use other characteristics indicative of ripeness such as fading of color from midrib and change in apparent leaf texture.
  8. If Tobacco plants have 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.
  11. Rinse spray equipment with water after application. Do not contaminate water supplies by cleaning of equipment or disposal of wastes.
  12. Use only one application of this product on Tobacco per season.
  13. Allow at least 7 days after application before harvest of Tobacco.
  14. Should washoff occur within 6 hours of application to Tobacco, a single repeat application may be made.

### TO CONTROL SPROUTING ON ONIONS

This product should be applied when Onion bulbs are fully mature, have five to eight green leaves and necks soft enough for the tops to fall if they have not already done so. The spray is often applied when 50% of the tops are still green. This condition usually occurs about two weeks to 10 days before harvest. Green tops are essential for the absorption of this product.

### ATTENTION

Avoid spraying edible Onions too early. Spongy bulbs might result if spraying is done earlier than two weeks before maturity.

### APPLICATION METHODS AND RATES:

1. **Ground Application:** Apply 3.3 pounds of this product in 100 to 150 gallons of water per acre with a ground sprayer. Complete uniform coverage is essential for obtaining satisfactory sprout control. The use of Surf-Ac™ 820 at the rate of 1 quart per 100 gallons of solution is recommended in some regions of the U.S. to enhance coverage and absorption of this product. Consult State and Local use recommendations and history concerning the addition of surfactants with maleic hydrazide products.
2. **Aerial:** Apply 3.3 pounds of this product in a minimum of 10 gallons of water per acre. It is essential to maintain consistent height as field is being sprayed. Maintaining a height between, but not less than, 8 to 12 feet will provide for more uniform coverage of the spray solution across entire field.

### SPECIAL NOTE:

1. This product should be applied at temperatures below 85°F or at temperatures below 80°F if the daytime high temperature is to exceed 85°F. This product is water-soluble and under high temperature and low humidity conditions can crystallize on the leaf surface and not be absorbed fully into the plant.
2. This product should be used with an Onion variety that has good keeping qualities. This product will not make poor keeping varieties equal to good keeping varieties.

### TO CONTROL SPROUTING POTATOES IN STORAGE

#### When to Apply:

1. Timeliness of application is important. Check your field to see if you have a good set of Potatoes.
2. In order for thorough translocation of the active ingredients down to the tubers, this product should be applied after tubers are formed and while vines are still green and free from insects, disease and other damage. This may occur as early as 2 to 3 weeks past full bloom when the primary and secondary inflorescences have lost most of their flowers and a few third order inflorescences and buds are present.
3. This product is applied when most of the tubers set are approximately one inch in diameter. This occurs when the few lower leaves show a yellow color. In areas where Potatoes flower uniformly, this is one week after blossoms fall off the vine, usually in August, 4 to 6 weeks before harvest.
4. Application to Potatoes prior to the above mentioned times may result in reduced size of Potatoes and possibly phytotoxicity.
5. Spray Potatoes at least 24 hours before rain. Rain occurring within 24 hours after application will reduce effectiveness.
6. Do not use this product on potato plants grown for seed production.

5/17

### APPLICATION METHODS AND RATES

- 1. Ground Application:** Apply 5 pounds of this product in 50 to 150 gallons of water per acre by ground spraying equipment. Complete uniform coverage is essential for obtaining satisfactory sprout control. The use of Surf-Ac 820 at the rate of 1 quart per 100 gallons of solution is recommended in some regions of the U.S. to enhance coverage and absorption of this product. Consult state and local use recommendations and history concerning the addition of surfactants with maleic hydrazide products.
- 2. Aerial Application:** Apply 5 pounds of this product in a minimum of 10 gallons of water per acre. Maintaining a consistent height between but not less than 8 to 12 feet will provide for more uniform coverage of the spray solution across entire field.

### SPECIAL NOTE

This product should be applied at temperatures below 85°F or at temperatures below 80°F if the daytime high temperature is to exceed 85°F. This product is water-soluble and under high temperatures and low humidity conditions can crystalize on the leaf surface and not be fully absorbed into the plant.

### FOR INHIBITION OF GROWTH OF TREES, SHRUBS AND IVY:

This product will inhibit growth of various trees, shrubs and ivy. The plants should first be pruned into the desirable shape. After regrowth of 2 to 4 inches occurs, spray on this product. It can also be applied in Spring as soon as new leaves have expanded. The following tree species can be treated: Alder, Elm, Oak, Poplar, Sweet gum, Sycamore, Tamarack and Willow.

The following shrubs can be treated: Algerian Ivy, Cissus, Eugenia, Forsythia, Hahns Ivy, Honeysuckle, Ice plant, Myrtus, Pittosporum, Privet, Pyracantha, Viburnum and Yuloxmas.

**HOW TO APPLY:** The following spray solution should be sprayed in the upper half of the tree if top terminal growth is to be inhibited. If the side of a tree is to be inhibited, spray the half of the tree on the pruned side. For shrubs and ivy, spray all surfaces of the leaves and bark. Add 5 pounds of this product to 100 gallons of water. Apply this solution to shrubs at a rate of 100 gallons per acre or to trees at a rate of 200 gallons per acre. Wet all surfaces of leaves and bark.

**Compressed Air Shoulder Sprayer**—Add 3 tablespoons of this product to 1 gallon of water and apply this solution to shrubs at a rate of 100 gallons per acre or to trees at a rate of 200 gallons per acre. Hose-on attachments can be used to spray trees and shrubs. Wet all surfaces of leaves and bark. Consult instructions on applicator for delivering the equivalent of 5 pounds of this product in 100 gallons of water (equals 3 tablespoons of this product in 1 gallon of water).

**10X Concentrate Spray**—Concentrate spray equipment can be used replacing 90% of the water normally used in dilute sprays. Consult for specific instructions if you plan to use a concentrate spray.

**When to Spray Trees and Shrubs**—Best results are obtained when the spray is applied to vigorous new growth. For example:

1. In Spring just as the new leaves have expanded and new growth has started.
2. In Summer after pruning and new regrowth is 2 to 4 inches in length.

**HOW THIS PRODUCT INHIBITS GRASS GROWTH:** This product is absorbed into the green grass blades and translocated by the plant fluids to the active growth areas of the plant where cell division is retarded. This product prevents seed head formation and slows down leaf growth. If an area is not mowed after this product is applied, the turf will slowly grow to 6 or 12 inches in height by the end of the growing season as the effect of this product gradually "wears off." If this product is not applied before the seed head is formed, the seed head will expand in spite of the presence of this product. If this occurs, at least one week should then be allowed for this product to circulate throughout the plant.

The area should then be mowed to no less than 4 inches in height. Inhibition of subsequent growth will then be observed.

If a neatly clipped appearance is required, the product application should be supplemented by mowing.

**HOW TO APPLY:** Apply this product to green grass since brown grass will not absorb the spray. Use of this product is limited to one application per year made either in the Fall or the Spring followed by correct maintenance procedures, to produce required turf growth control.

**Spring Application (about April 10-June 1)**—Use 5 pounds of this product in 50 gallons of water per acre to reduce or eliminate mowing. The two week period in the Spring when the grass has grown 2 to 4 inches is ideal for applying this product. This is the period when Forsythia and Dandelion are in full bloom. The grass is in a vigorous growing condition and will absorb the chemical at the maximum rate. It will prevent seed head formation and inhibit growth of foliage. If spraying is delayed beyond this period, a mowing may be required to trim the area to improve appearance.

Allow one week for translocation of the chemical before this mowing. Do not spray newly mowed areas covered with debris; this will interfere with coverage and absorption causing poor results.

**Fall Application (about October 1-November 15)**—Use 6.25 pounds of this product in 50 gallons of water per acre to reduce growth next season. The Fall treatment is applied to green grass before

it becomes dormant. Since growth is inhibited the following Spring, the area will "green up" about two weeks later than untreated grass. Apply this product as close to the time the grass becomes dormant as possible but when it is still green. Do not spray when there is a cover of fallen leaves as this will interfere with coverage and absorption, causing poor results. This product will control Wild onion and Garlic and biennial type weeds such as Dandelion and Plantain when applied in the Fall.

Do not apply during the Summer (June 1-September 25) since most permanent grasses become partially dormant in Summer. (The major reason for Summer mowing is the presence of Annual grasses and weeds which will have to be controlled with herbicides or mowing since they are not present when this product is applied to the Perennial grasses.)

**CONTROLLING ANNUAL BLUEGRASS:** To reduce *Poa annua* (annual bluegrass) on golf course fairways, first mow area twice in normal sequence usually 5 to 8 days apart. When third mowing is needed, before the first *Poa annua* seed heads appear, spray 1 pound of this product in 30 to 40 gallons of water per acre. (If over 40 gallons of water is used per acre, the effectiveness may be reduced.) The effect of treatment should be evident in 8 to 10 days. This "light" treatment of this product eliminates or greatly reduces reseeding of *Poa annua* with little retarding of grass growth.

**OVERSEEDING RYEGRASS IN BERMUDAGRASS:** Excessive growth of Bermudagrass on golf greens is often a problem in the Fall after verticutting, fertilization, overseeding and top dressing.

Apply this product in late September or early October to inhibit the growth of Bermudagrass and enable Rye or other grasses to produce a good stand. Use 2.5 pounds of this product in 50 gallons of water per acre. This product should be applied with a calibrated boom. The Bermudagrass must be in good condition. Overseed no sooner than 48 hours after spraying.

### TO INHIBIT GRASS ALONG EDGES OF HOME LAWNS (See "NOTES" No. 4):

Apply the equivalent of 1.25 pounds of this product in 100 gallons of water per acre in Spring (about April 10-June 1) to a 6-inch band along sidewalks and edges of shrubs and trees. For a compressed air shoulder sprayer add 3 tablespoons of this product in 1 gallon of water and spray 6-inch band 800 feet long.

Hose-on attachments can be used for edging of lawns. Consult instructions on applicator for delivering the dosage recommended by edging.

### TO CONTROL WILD ONIONS AND WILD GARLIC IN LAWNS AND GRASS AREAS ALONG HIGHWAYS (Not Pasture or Crop Land):

Apply 3.75 to 7.5 pounds of this product in 20 to 100 gallons of water per acre in Spring or Fall when about 90 to 95% of the bulbs have started regrowth. Use on lawns only when grass is brown and dormant. (See "NOTE" No. 8.)

**EQUIPMENT TO APPLY THIS PRODUCT:** It is essential that this product be applied uniformly with the proper equipment.

### RECOMMENDED EQUIPMENT:

1. Trucks in all cases should be equipped with a special speedometer or tachometer reading from 0 to 15 miles per hour. Truck speedometers are generally inaccurate at this low speed. A centrifugal pump with a capacity of 100 gallons per minute and 50 pounds nozzle pressure plus off-center nozzles are recommended for applying this product. A series of nozzles activated by valves controlled within the cab permits application at 10 to 15 miles per hour covering all types of terrain found along highways. The off-center nozzle will cover up to 30 feet from the road on calm days.

### 2. Booms:

- a. The Burg-Bean boom gives excellent coverage when properly calibrated and operated. Smaller amounts of water, 30 to 50 gallons per acre, may be used when applying this product with booms.
- b. Small booms mounted on tractors or jeeps are satisfactory when properly nozzled, calibrated and operated. Booms are advised only when there are few or no obstructions.

3. Air Carry Methods (Modified Air Blast Sprayer). This is the newest method for applying this product. Large, low-pressure droplets ride the air stream and deposit this product on the difficult to mow areas. It is the only equipment that will economically and satisfactorily apply this product over wide areas (up to 90 feet). It will easily cover all types of terrain on shoulders and medians.

**USE OF 2,4-D:** 2,4-D may be used with this product when control of Broadleaf weeds is desired in Turf. A low volatile ester or amine salt formulation is compatible with this product.

In some areas weeds may emerge after this product is applied. A second application of 2,4-D would be necessary to control these weeds. Use 2,4-D only on grasses recommended by the manufacturer's label. Follow manufacturer's label when handling or spraying 2,4-D to prevent drift.

**EFFECT OF RAIN ON TREATMENT:** This product should be applied during a period when rain is not expected for 12 hours after treatment. Since this product is water-soluble, a rain will wash the chemical off the leaf blade before absorption occurs. Once this product is absorbed, rain has no effect on performance.

**WHERE SHOULD THIS PRODUCT BE USED:** This product should be used on good turf, three or more years old, which needs frequent mowing, and areas difficult to mow.

This product will improve the safety of mowing by reducing the need for frequent mowing of hazardous locations and eliminating mowing of cuts and fills where a seasonal growth up to 6 to 11 inches can be tolerated.

**CONDITIONS AFFECTING ABSORPTION OF THIS PRODUCT BY GRASS:** It has been found that a greater amount of this product will enter the leaf in the shortest time and give the best results when the plants are growing rapidly in moist soil. This product is not absorbed when (1) leaves are wilted and (2) during periods of extended drought when the soil is dry.

**NOTES:**

1. 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.
2. Do not pasture livestock in, or cut hay from treated areas.
3. This product can be used along highways, airports, military installations, golf course fairways, roughs and similar areas. Do not feed treated foliage to livestock or graze treated areas.
4. At recommended application rates this product does not normally affect the color of grass. Under conditions of optimum absorption, color modification for a period of several weeks may be encountered. At times, treated grass may be a greener color than untreated grass. It may also remain greener for a longer period under drought conditions. No adverse effects on color have been observed from Fall application. Some delay in Spring "green up" is normal.
5. Do not spray on trees when wind velocity exceeds 15 miles per hour.
6. This product is not corrosive to spray equipment.
7. Rinse spray equipment with water after applications. Do not contaminate water by cleaning of equipment or disposal of wastes.
8. For control of Wild onions and Garlic do not apply to young seedlings less than one season old or Winter pastures consisting of small grains such as Rye.

**6/7**  
**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 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 water and soap to remove remaining pesticides.
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.

**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. 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.



**Drexel Chemical Company**

7/7

April 23, 2004

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Rm 266A, Crystal Mall 2  
1921 Jefferson Davis Hwy.  
Arlington, VA 22202

**Re: Submission of Revised Label by Notification per PR Notice 95-1  
DREXEL SUCKER-STUFF 80-G (EPA Reg. No. 19713-361)**

Herewith:

1. Completed EPA Form 8570-1.
2. One (1) copy of the revised label (361SP-0404++). The following is the change made on the label:
  - i) In the Environmental Hazards section, the paragraph, "Note: Add this statement to all container sizes.....Office of the EPA." was deleted. Per PR Notice 95-1, this only applies to end-use products registered for industrial preservative, water treatment, other industrial processing uses and commercial and institutional uses.
3. Certification Statement per PR Notice 98-10

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

Thank you.

Respectfully yours,  
FOR DREXEL CHEMICAL COMPANY

  
Luz Chan  
Registration Manager

