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19713-371

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DEC 19 1996

Barbara Brown  
Drexel Chemical Company  
P.O. Box 9306  
Memphis, TN 38109

Dear Ms. Brown:

Subject: Label Revisions - Eliminate Water Soluble Packaging (WSP)  
Labeling  
Drexel Sucker-Stuff Stop 60 WS  
EPA Registration Number 19713-371  
Your Submission Dated November 21, 1996

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. The referral statement states "See entire label before using this product". If the Precautionary Statements do not appear on the front panel, the referral statement must indicate the location of the Precautionary Statements on the labeling.

b. The boxes around the Statements of Practical Treatment and Precautionary Statements are not required by our Regulations and should be deleted since these boxes detract from highlighting of the Worker Protection text which is required.

c. In the Hazards to Humans section reinstate:

Avoid contact with skin, eyes or clothing.

d. In the ingredient declaration align the decimal points on the same margin and assure that they all of equal prominence. Delete the decimal point that appears before "20.0%".

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e. In the Environmental Hazards Section delete "For terrestrial uses,". Refer to PR Notice 93-8.

f. Move the General Information paragraph to the Directions For Use section.

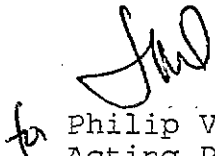
g. The Surface Water Advisory should be moved to the Environmental Hazards section.

h. The enclosed PR Notice 94-8 states on page 2 "Labeling of an individual WSP unit is optional if the WSP is integrally sealed in an outer container that bears appropriate labeling". You may not have more than one WSP in a container if no text appears on the Water Soluble Packet. Delete the statement "Reseal outer bag to protect remaining packets" on labeling of containers containing WSP with no printing on the PVC film.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



to Philip V. Errico  
Acting Product Manager (22)  
Fungicide-Herbicide Branch  
Registration Division (7505C)

Enclosure

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**DREXEL  
SUCKER-STUFF (R) 60 WS**

A water-soluble growth retardant for the control of suckers in tobacco.

**ACTIVE INGREDIENT:**

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

**INERT INGREDIENTS:** ..... ~~30.0%~~

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

\*Hereafter called potassium salt of maleic hydrazide. This product contains 60% maleic hydrazide by weight.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**Read Entire Label Before Using This Product**

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. DO NOT induce vomiting or give anything by mouth to an unconscious person.

**IF IN EYES:** Immediately flush eyes with plenty of water. Get medical attention if irritation persists.

**IF ON SKIN:** Wash skin with soap and plenty of water. Get medical attention.

EPA Reg. No. 19713-371  
EPA Est. No. 19713-TN-1

Net Content: 2 x 1.875 Lb.

Revision : 1/15/93 - Worker Protection  
Revisions: 02/94 - Worker Protection  
Revised: 11/94 - MH "RED"  
Revision: 11/08/96 - Adding "Do Not Remove Package From Container Except For Immediate Use" and deleting the printing of PVA Film.

DREXEL CHEMICAL COMPANY  
1700 Channel Av  
Memphis, Tn 38113-0327

SUCKER-STUFF is a registered trademark of Drexel Chemical Company  
F:\label\bls\SSTUF60W

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated**

DEC 19 1996

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

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**PRECAUTIONARY STATEMENTS**

**HAZARDS 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*

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

**Applicators and other handlers must wear:** Long-sleeved shirt and long pants, Shoes and socks and Waterproof gloves

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.

The closed systems or enclosed cabs must be used 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**

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**GENERAL INFORMATION:** SUCKER-STUFF 60 WS is a water-soluble growth retardant for the control of suckers in tobacco. Its systemic activity controls sucker growth by keeping suckers from growing, rather than by killing them.

**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 ground water, 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, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours. Personal Protective Equipment required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soils or water is: Coveralls, Waterproof gloves and Shoes and socks

**MIXING AND USE OF WATER-SOLUBLE PACKETS**

Do not remove package from container except for immediate use.

Packets containing SUCKER-STUFF 60 WS are water-soluble. Do not allow packet to become wet prior to adding to the spray tank. Do not handle with wet hands. Reseal outer bag to protect remaining packets. To prepare the spray mixture, first determine the total amount of SUCKER-STUFF 60 WS to be used and the volume of water necessary for proper dilution as specified under Application Rates. Begin filling the tank with water and drop the required number of unopened packets into the water. Do Not Attempt to Open the Water-Soluble Packets. When the packets have completely dissolved, start hydraulic (by-pass) or mechanical agitation. Do not use air agitation.

**TOBACCO**

To Prevent Sucker Development on Flue-cured, Burley, Dark-Fired, Maryland, and Cigar (Pennsylvania and Wisconsin) Tobacco.

Since maleic hydrazide is absorbed and moves inside the tobacco plant, spraying the whole plant is not necessary. Best results can be obtained by spraying the upper 1/3 to 1/2 of the plant. It is very important to apply equal amounts of SUCKER-STUFF 60 WS to each plant at the correct time to obtain satisfactory control.

**When to Spray Flue-Cured, Burley, Dark-Fired and Maryland 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 and spray SUCKER-STUFF 60 WS uniformly on the entire field within 24 hours after topping (see Notes 1-8).
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 and top them. Remove all suckers from the entire field, and apply SUCKER-STUFF 60 WS within 24 hours. (see notes 1-8). Tip leaves should be at least 6 inches long at time of spraying.

**When to Spray: Pennsylvania Cigar Tobacco**

1. If your field flowers uniformly:
  - a. Top when about 1/4 to 1/2 of your plants show one or more open flowers on each head.
  - b. Wait three days after topping.
  - c. Spray SUCKER-STUFF 60 WS. For best results, SUCKER-STUFF 60 WS 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 all suckers.
- c. Spray SUCKER-STUFF 60 WS over your entire field.

When To Spray: Wisconsin Cigar Tobacco

- 1. Top field when most of the plants in your field are in full flower.
- 2. Remove by hand all suckers.
- 3. Spray within 24 hours after topping and removal of suckers.

How to Spray: SUCKER-STUFF 60 WS may be applied with either tractor drawn conventional sprayer or with a compressed air shoulder sprayer.

- 1. **Tractor-Drawn Sprayer:** Any number of nozzles may be used (see Note 5). SUCKER-STUFF 60 WS can be applied in the same manner as insecticides, spraying one or more rows at a time, wetting the upper 1/3 to 1/2 of plant.
- 2. **Compressed Air Shoulder Sprayer:** Spray one side of each tobacco row while walking at a constant rate. Use an up and down motion of spray nozzle to moisten the upper 1/3 to 1/2 of each plant. Apply equal amounts of spray to each plant.

The spray solution can be premixed in such a way that each packet is dissolved in the equivalent of 15 to 25 gallons of water (1/2 acre of treatment). First, dissolve one packet in 5 gallons of water. Then, transfer a portion of this premix solution and further dilute with fresh water as follows:

FOR EQUIVALENT 1/2 ACRE OF SOLUTION	ADD PREMIX TO SPRAY TANK	AND DILUTE FURTHER TO
15 gals.	1 gal.	3 gals.
25 gals.	1/2 gal.	2 1/2 gals.

Amount of Spray to Use: Apply the recommended amounts of SUCKER-STUFF 60 WS in 30-50 gallons of water per acre. DO NOT USE less than 30 gallons of water per acre.

APPLICATION RATES

For Flue-Cured, Burley, Cigar (Pennsylvania or Wisconsin) and Maryland Tobacco: Use 2 packets of SUCKER-STUFF 60 WS per acre. For Dark Tobacco : Use 4 packets of SUCKER-STUFF 60 WS per acre.

NOTE:

- 1. To control tobacco suckers apply SUCKER-STUFF 60 WS 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. Should wash-off occur within 6 hours of application to tobacco, a single repeat application may be made.
- 3. Follow dosage recommendations carefully, spray field uniformly and do not use less than the minimum amount of water recommended per acre on tobacco.
- 4. Do not use on tobacco plants grown for seed production.
- 5. Do not spray tobacco on hot, dry days when leaves are severely wilted or when crop is under stress. 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).

6. Closely hand-suckered or SUCKER-STUFF 60 WS treated tobacco will not ripen as rapidly as poorly suckered tobacco. Also, under some conditions, SUCKER-STUFF 60 WS treated tips 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 SUCKER-STUFF 60 WS by using time and the color of the leaves as your only guide to ripeness. Use other characteristics indicative of ripeness such as (a) fading of color from midrib (b) change in apparent leaf texture.
7. If tobacco plants have been grown under drought conditions, absorption of SUCKER-STUFF 60 WS will be slow and results may be less satisfactory than plants grown under more favorable moisture conditions.
8. Too little SUCKER-STUFF 60 WS will result in less than desired control. Too much is wasteful, may cause burning of leaves, and may reduce quality of tips.
9. SUCKER-STUFF 60 WS 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. Use only one application of SUCKER-STUFF 60 WS on tobacco per season.
12. Allow at least 7 days after application before harvest of tobacco.

**STORAGE AND DISPOSAL**  
Do not contaminate water, food, or feed by storage or disposal.

**STORAGE INSTRUCTIONS**  
Storage should be under lock and key in a ventilated room and secure from access by unauthorized persons and children. Storage should be in a cool dry area away from heat or ignition source. Store in original containers only. Avoid storage near water supplies, food, feed, and fertilizer to avoid contamination. Keep away from any puncture source. Carefully open outer bag. Never open the water soluble pouch. After partial use of outer bag, fold and roll back bags, clamp and close tightly. Do not put concentrate or dilute material into food or drink containers.

Do not move containers from one area to another unless they are securely sealed. If the contents are leaking or material is spilled follow these steps:

- 1) Contain liquid spill, absorb with a material such as saw dust, clay granules or dirt. If dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents.
- 2) Wash area with water and soap to remove remaining pesticides.
- 3) Follow washing with clean water rinse.
- 4) Do not allow runoff to enter sewer or contaminate water supplies.
- 5) Dispose of wastes.

**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:** When each water soluble packet has been placed into application equipment, dispose of empty outer bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

**WARRANTY**

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. Buyers assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith. In no case shall Drexel or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.