1/7

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 Sprout Stop 60 WS

EPA Registration Number 19713-372

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 ingredient declaration align the decimal points on the same margin and assure that they all of equal prominence.
 - d. In the Environmental Hazards Section delete "For terrestrial uses,". Refer to PR Notice 93-8.
 - e. The Surface Water Advisory should be moved to the Environmental Hazards section.

- f. 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".
- 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,

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

Enclosure

DREXEL SPROUT STOP ^(R) 60 WS

Potassium salt of 6-hydroxy-3-(2H)-pyridazinone* 80\0 INERT INGREDIENTS: 20.09

TOTAL: 100.0%

*Hereafter called potassium salt of maleic hydrazide. 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: Immediately remove contaminated clothing, including shoes and wash skin with soap and plenty of water. Get medical attention.

EPA REG. NO. 19713-372 EPA EST. NO. 19713-GA-1 NET CONTENTS: 2 X 1.875 LBS.

DREXEL CHEMICAL COMPANY P. O. BOX 13327 MEMPHIS, TN 38113-0327

Revision: 1/15/93 - Worker Protection Revisions: 11/01/94 - MH "RED"

Revisions: 11/08/96 - "Adding "Do Not Remove Package From Container Except For Immediate Use" and deleting the

printing of PVA Film

Sprout Stop is a registered trademark of Drexel Chemical Company F:\label\Ibls\SSTOP60W

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 19 1996

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

19713-372

96 NDV 25 712:05

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

Users should: 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.

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 SPROUT STOP 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 SPROUT STOP 60 WS to be used and the volume of water necessary for proper dilution as specified under Application Methods and 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.

TO CONTROL SPROUTING OF ONIONS IN STORAGE

SPROUT STOP 60 WS should be applied when onion bulbs are fully mature, have 5 to 8 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 percent 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 maleic hydrazide.

ATTENTION

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

APPLICATION METHODS AND RATES

- Ground Application: Apply 6 to 7 packets of SPROUT STOP 60 WS in a minimum of 120 gallons of water per 4 acres with a ground sprayer. Complete uniform coverage is essential for obtaining satisfactory sprout control.
- 2. Aerial Application west of the Rocky Mountains: Apply 6 to 7 packets of SPROUT STOP 60WS in a minimum of 40 gallons of water per 4 acres. Aerial Application east of the Rocky Mountains: Apply 6 to 7 packets of SPROUT STOP 60WS in a sufficient quantity of water to gain uniform coverage of 4 acres.

It is essential to maintain consistent height as the field is being sprayed. Maintaining a height between 8 and 12 feet, but not less than 8 feet, will provide a uniform coverage of the spray solution across the entire field. The heights should be reduced as cross-winds exceed 2 to 4 MPH.

SPECIAL NOTE

- 1. Carefully follow dosage recommendations and spray field uniformly.
- 2. Even though SPROUT STOP 60WS is non-volatile, no drift should be permitted onto nearby crops. Particular care should be taken to prevent drift when aerial applications are being made.
- 3. Spray onions at least 24 hours before rain or applying overhead irrigation. Rain or overhead irrigation occurring within 24 hours after application will reduce effectiveness.
- 4. SPROUT STOP 60WS should be applied at temperatures below 80°F if the temperature is expected to exceed 85°F later the same day, application should not be made.
- 5. SPROUT STOP 60WS should be used with an onion variety that has good keeping qualities. SPROUT STOP 60WS will not make poor keeping varieties equal to good keeping varieties.

TO CONTROL SPROUTING OF 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.

In order for thorough translocation of the active ingredients down to the tubers, SPROUT STOP 60 WS 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 2-3 weeks past full bloom when the primary and secondary inflorescence have lost most of their flowers and a few third order inflorescences and buds are present.

3. SPROUT STOP 60 WS 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.

APPLICATION METHODS AND RATES

- 1. Ground Application: Apply 6 to 8 packets of SPROUT STOP 60WS in a minimum of 90 gallons of water per 3 acres by ground spraying equipment. Complete coverage is essential for obtaining satisfactory sprout control. Use the higher rate when vines are robust and in areas where vines stay green and vigorous up through the time of crop desiccation and for varieties that sprout rapidly in storage (such as Norgold) or when potato tubers will be stored under extended high temperatures.
- 2. Aerial Application West Of The Rocky Mountains: Apply 6 to 8 packets of SPROUT STOP 60WS in a minimum of 30 gallons of water per 3 acres. Aerial Application East Of The Rocky Mountains: Apply 6 to 8 packets of SPROUT STOP 60WS in a sufficient quantity of water to obtain complete coverage of 3 acres.

Use the higher rate when vines are robust and in areas where vines stay green and vigorous up through the time of crop desiccation and for varieties that sprout readily in storage (such as Norgold) or when potato tubers will be stored under extended high temperatures.

It is essential to maintain consistent height as the field is being sprayed. Maintaining a height between 8 and 12 feet, but not less than 8 feet, will provide a uniform coverage of the spray solution across the entire field. The heights should be reduced as crosswinds exceed 2 to 4 MPH.

SPECIAL NOTE:

- 1. Carefully follow dosage recommendations and spray field uniformly.
- 2. Even though SPROUT STOP 60WS is non-volatile, no drift should be permitted onto nearby crops. Particular care should be taken to prevent drift when aerial applications are being made.
- 3. Spray potatoes at least 24 hours before rain or applying overhead irrigation. Rain or overhead irrigation occurring within 24 hours after application will reduce effectiveness.
- 4. At least a 2 week interval should be allowed between SPROUT STOP 60WS application to potatoes and the use of a vine killer.
- 5. Uneven application may result in budend cracking and/or "elephant hide" on potato tubers.
- 6. To obtain desired results, plants should not be stressed from either too little or excessive water before or after application.
- 7. SPROUT STOP 60WS should be applied at temperatures below 80°F. If the temperature is expected to exceed 85°F later the same day, application should not be made.
- 8. Do not use SPROUT STOP 60WS on potato plants grown for seed production.

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.
- 4) Follow washing with clean water rinse. _
- 5) Do not allow runoff to enter sewer or contaminate water supplies.
- 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. Buyer 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.