



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Chemtura USA Corporation
199 Benson Road, 2-4
Middlebury, CT 06749-0001

FEB 20 2007

Subject: OFF-SHOOT-T
EPA Registration No. 400-542
Your label amendment dated August 16, 2006

Dear Mr. Cummings,

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided that the registrant complies with the conditions as stated herein.

1. In the section "Precautionary Statements" the sentence "Wear protective eyewear." must be completed by including a variation of statement: "Wear protective eyewear such as goggles, face shield, or safety glasses."
2. In contrast to the previously accepted label of April 19, 1996, it was noted that the statement discouraging product use during periods of rain was deleted from the revised label. The sentence "Do not apply during the rains or...OFF-SHOOT-T again." is not included in the revised label's section "Directions for Application". Ensure the deleted statement was, in fact, intended as its suggestive of product efficacy, in the event of inclement weather conditions or the like.
3. The section "Important Notice" must be revised by appending: "*To the extent permitted by applicable law seller warrants that...*" As currently written the statement negates and/or detracts from labeling requirements as set forth by the Agency in 40 CFR Part 156, and is, therefore, considered misbranding.

If you have any questions, please contact Bryant Crowe by phone at (703) 305-0025 or via email at crowe.bryant@epa.gov.

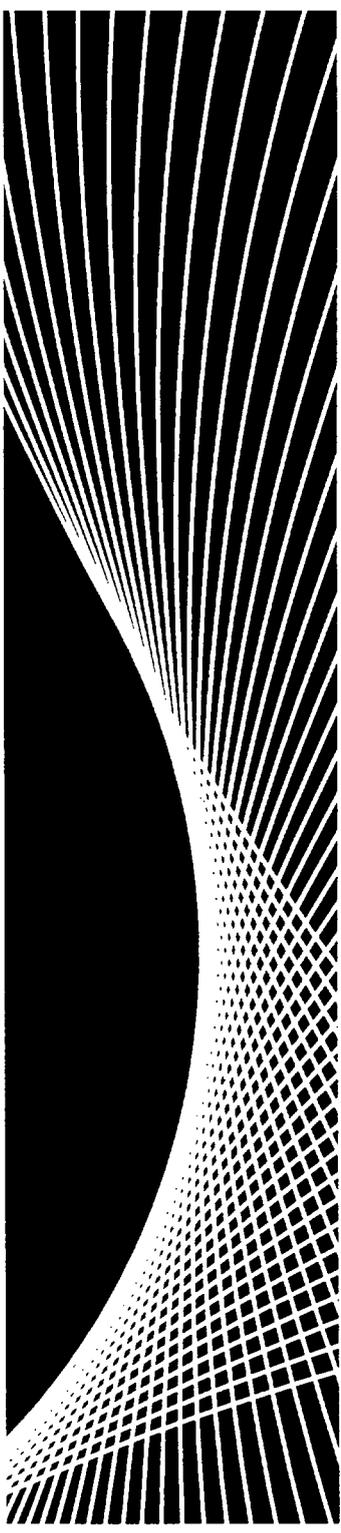
Sincerely,

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Cynthia Giles-Parker
Branch Chief
Fungicide Branch
Registration Division (7505P)

Enclosure

Off-Shoot-T™



Tobacco Sucker Control Agent High Active Formula

Net
Contents:

Active Ingredients	
fatty alcohols (C ₆ -0.5% ; C ₈ -42% ; C ₁₀ -56% ; C ₁₂ -1.5%)*	85%**
Other Ingredients:	15%
Total	100%

*CAS No. 68603-15-6
 **Contains 6.01 pounds of active ingredient per gallon
 **Contains 722 grams of active ingredient per liter

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.)

FIRST AID	
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 lens, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
EMERGENCY ASSISTANCE: Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
EMERGENCY PHONE	800-292-5898
SAFETY DATA AND INFORMATION	203-573-3303
TRANSPORTATION EMERGENCY (CHEMTREC)	800-424-9300

**ACCEPTED
with COMMENTS
in EPA Letter Dated
FEB 20 2007**

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

400-542

EPA REG. NO. 400-542
 EPA EST NO.
 002



Manufactured for:
 Chemtura USA Corporation
 Middlebury, CT 06749

www.chemtura.com

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

WARNING

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

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

Applicators and Other Handlers Must Wear: long-sleeved shirt and long pants; chemical resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride; shoes plus socks; protective eyewear.

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 and 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:

- 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.

ENVIRONMENTAL HAZARDS

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 when disposing of equipment washwater or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all label directions carefully before use.

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 24 hours.**

PPE 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, soil, or water, is: coveralls; chemical resistant gloves made of any waterproof material; shoes plus socks; protective eyewear.

OFF-SHOOT-T™ is a carefully balanced combination of fatty alcohols and wetting agents used for the contact control of sucker growth on Burley, Flue-Cured, Dark, Maryland and Cigar 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.

**DIRECTIONS FOR APPLICATION
WHEN TO APPLY**

OFF-SHOOT-T can be applied either before or after topping. Best results are usually obtained by spraying the tobacco with OFF-SHOOT-T before topping in the early to late button stage and then topping the tobacco within a few days, removing any suckers that were missed. If you top the tobacco plants before spraying, remove any suckers over one inch in length as you top and apply OFF-SHOOT-T immediately after topping. Because OFF-SHOOT-T is a contact type agent, it is necessary to straighten any plants that are leaning so that the emulsion flows down the stalk evenly and contacts each sucker.

OFF-SHOOT-T can be applied any time during the day. For best results, we recommend that you wait until the dew dries before spraying. Do not apply during the rain or when plants are wet. If, however, it rains after OFF-SHOOT-T has been on the plants for over an hour, you should not have to apply OFF-SHOOT-T again. Do not spray after the leaves begin to close in the evening. Because the underside of leaves may be injured by contact with OFF-SHOOT-T, do not apply when the wind is high enough to turn top leaves over.

HOW MUCH TO APPLY

Flue-Cured: For Power Sprayer - use 1.5 to 2.5 gallons in 50 gallons of water. For Hand Sprayer - use 4 to 5 fluid ounces per gallon of water.

Burley: For Power Sprayer - use 1.75 to 2 gallons in 50 gallons of water. For Hand Sprayer - use 4 to 5 fluid ounces per gallon of water.

Dark: Use 6 to 8 fluid ounces per gallon of water to apply with hand sprayer.

Cigar: Use 4 to 5 fluid ounces per gallon of water to apply with hand sprayer.

Maryland: Use 4 to 4.5 fluid ounces per gallon of water to apply with hand sprayer.

When applied by hand, 1 gallon of diluted OFF-SHOOT-T will treat approximately 190 plants. If a power sprayer is used, 40 to 60 gallons of diluted product should be applied per acre of tobacco.

HOW TO APPLY

The diluted emulsion is most easily prepared by adding the required amount of OFF-SHOOT-T 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 OFF-SHOOT-T, rather than OFF-SHOOT-T to the water.

If you use a hand-held or back-pack sprayer, the diluted emulsion should be applied at a rate of $\frac{2}{3}$ to 1 fluid ounce per plant (or enough to assure 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 20 pounds per square inch (psi) be used.

When applied with power equipment, use three nozzles per row (TG-3 full-cone tips, or equivalent is recommended). Replacing the center TG-3 nozzle with a TG-5 full-cone nozzle, which provides more spray solution down the stalk, is also recommended. One nozzle should be directed downward over the center of the row and one should be 9 inches on either side directly at or slightly above the top of the stalk. Apply the diluted OFF-SHOOT-T to the tobacco as a coarse spray 12 to 16 inches above the top of the stalk. Keep the boom pressure at 20 to 25 psi, and never exceed 25 psi. If you use the recommended spray tips, spray at approximately 20 psi pressure, and operate at ground speed of 2.5 to 3 mph, you will apply approximately 50 gallons of diluted emulsion per acre of tobacco.

HOW OFTEN TO APPLY

In many cases a single application of OFF-SHOOT-T is satisfactory to control both primary and secondary suckers. On uneven tobacco or if secondary sucker growth appears vigorous, 2nd and 3rd applications 3 to 5 days apart may be advantageous. It is often best to use a 5% concentration (2.5 gallons in 50 gallons of water) for the second and third applications.

To help avoid using more than the recommended amount of maleic hydrazide (MH), a 5% application of OFF-SHOOT-T can also be made 3 to 4 weeks after applying MH. This application should be made when suckers are less than one inch in length, or suckers longer than one inch should be removed by hand.

Some growers of Burley, Flue-Cured, and Dark tobacco may favor a sequential treatment using OFF-SHOOT-T (not for the early button stage) followed 1-2 weeks later with Royal MH-30® (or other MH systemic sucker control agent) used in accordance with manufacturer's instructions. If this sequential treatment is used on Burley or Flue-Cured tobacco, application of 1.5 to 2 gallons of OFF-SHOOT-T in 50 gallons of water is adequate. If a sequential treatment is used on Dark tobacco, OFF-SHOOT-T should be used at 6 to 9 fluid ounces per gallon of water if applied by hand sprayer.

APPLICATION NOTES

If allowed to stand for more than 30 minutes, the diluted emulsion may separate. Always mix well before use.

DO NOT MIX OFF-SHOOT-T WITH OTHER CHEMICALS SUCH AS INSECTICIDES OR DEFOAMERS. Do not apply to tobacco plants that have recently been treated with other chemicals. Be sure that all spray equipment is clean before using.

In Burley tobacco, during long periods of high heat and humidity, and under other conditions that may favor the spread of hollow stalk or dry rot disease delay application of OFF-SHOOT-T until these conditions pass.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store in original container only. After partial use, replace lid and close tightly. Store in a secure place that is temperate, dry and out of direct sunlight.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or in an approved waste disposal facility.

EQUIPMENT CLEANING: This product is not corrosive to spray equipment. Following applications, all spray equipment should be thoroughly rinsed with water. Do not contaminate water when disposing of equipment washwater or rinsate.

CONTAINER DISPOSAL:

Plastic containers: Triple rinse (or equivalent). Pressure rinse is preferred. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Minibulk containers: Return empty containers for reconditioning and reuse.

IMPORTANT NOTICE - Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions and instructions specified on the label under normal conditions of use, **but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use for this product, contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.**

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