



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Michael Dupre  
Product Registration Manager, North America  
Chemtura Corporation  
199 Benson Road  
Middlebury, CT 06749

MAY 30 2008

Subject: Rejection of Notification Request

Dear Mr. Dupre,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated April 28, 2008, for the product OFF-SHOOT-T<sup>®</sup>-M (EPA Registration Number 400-542). The Registration Division (RD) has conducted its review of this request for its applicability under PRN 2007-4 and finds that while the label changes requested fall within the scope of PRN 2007-4, the warranty statement language you provide in the section "Important Notice" is not consistent with the language required in the Agency's last correspondence to you regarding this product, a letter from Cynthia Giles-Parker dated February 20, 2007.

Therefore, the RD has determined that this action is denied and will be further processed as a fast track amendment and our records have been updated accordingly. The label submitted with the application is considered proposed draft and has been forwarded to Tony Kish (PM 22) for further processing.

If you have any questions, please call me directly at 703-305-6249 or Steve Schaible of my staff at 703-308-9362.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

cc: Tony Kish  
Bryant Crowe



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<b>EPA</b>	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide - Section I**

1. Company / Product Name <b>400-542</b>	2. EPA Product Manager T. Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company / Product (Name) <b>OFF-SHOOT-T</b>	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) Chemtura Corporation 199 Benson Road Middlebury, Connecticut 06749-0001 <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 type="checkbox"/> Final printed labels in response to Agency letter dated _____.
<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.)

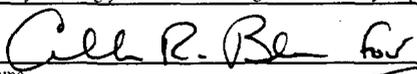
**Notification of label change per PR Notice 2007-4 (Container Disposal Statements).**

"This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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."

**Section - III**

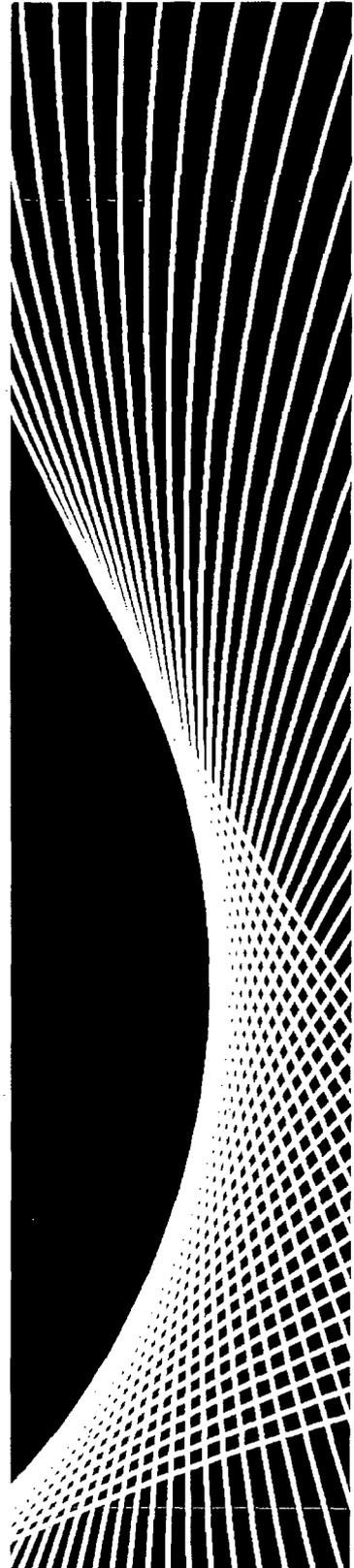
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt    No. Per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Packaging wgt    No. Per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 2 gal, 5 gal, 250 gal	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product Other "accordion" label: _____ face label with attached booklet	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Allen Blem	Title Registration Specialist	Telephone No. (Include Area Code) (203) 573-2487 e-mail: allen.blem@chemtura.com
<b>Certification</b>		
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 statements may be punishable by fine or imprisonment or both under applicable law.		
2. Signature 	3. Title Product Registration Manager, North America	
4. Typed Name Michael Dupre	5. Date 28 April 2008	

6. Late Application Received (Stripped)

# Off-Shoot-T®



## Tobacco Sucker Control Agent High Active Formula

Net  
Contents:  
**5**  
gallons

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

\*CAS No. 68603-15-6  
 \*\*Contains 6.01 pounds of active ingredient per gallon  
 \*\*Contains 721 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	
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lens, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>EMERGENCY ASSISTANCE:</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>EMERGENCY PHONE</b>	<b>800-292-5898</b>
<b>SAFETY DATA AND INFORMATION</b>	<b>866-430-2775</b>
<b>TRANSPORTATION EMERGENCY (CHEMTREC)</b>	<b>800-424-9300</b>

EPA REG. NO. 400-542  
EPA EST NO.  
003

Manufactured for:  
Chemtura Corporation  
199 Benson Road  
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 such as goggles, face shield or safety glasses. 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 water-proof 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

##### Nonrefillable Container

**Plastic Containers:** Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Then offer container for recycling, 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.

**Triple rinse** as follows: For containers small enough to shake: Empty the remaining contents into application or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container  $\frac{1}{4}$  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.

**Recycling:** Once cleaned, some agricultural pesticide containers can be taken to a container collection site or picked up for recycling. To find the nearest site, contact your chemical dealer or manufacturer, or contact the Ag Container Recycling Council (ACRC) at 1-877-952-2272 (toll free) or [www.acrecycle.org](http://www.acrecycle.org).

##### Refillable Container

**Mini-Bulk or Bulk Containers:** 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 percent 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 procedure two more times.

**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 conditions not reasonably foreseeable to seller, and, to the extent consistent with applicable law, the buyer assumes the risk of any such use.**

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