

282-7276.YLD

Base Pre-Reg. (7276)

U.S. LABEL

Reason to Issue: To reduce rate from 4-1/2 to 3-1/2 pints per season.

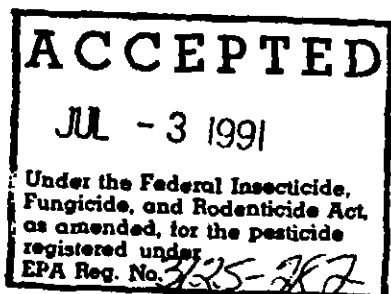
Date of Draft: 6/17/91 Pre-Reg (T)

EPA Reg. No. 3125-282

DEF 6

EMULSIFIABLE DEFOLIANT

Very Low Odor



ACTIVE INGREDIENT:
 S,S,S-Tributyl phosphorotri-
 thioate 70.5%

INERT INGREDIENTS: 29.5%
 100.0%

AMENDMENT

To Previously Registered Labeling

Revise as follows:

RESTRICTIONS

Do not apply more than 3-1/2 pints of DEF 6 per acre in any crop season.

Observe all labeling cautions and limitations of all products used in mixtures. Specifically, when Dropp 50WP is tank-mixed with DEF 6 in citrus growing areas, observe buffer zones and other restrictions on the Dropp 50WP label and/or in the Dropp 50WP manufacturer's recommendations.

Do not use DEF 6 on other crops used for food or forage. Avoid spray drift to susceptible plants, as this product can injure or defoliate other crops. (Coarse sprays are less likely to drift.)

Do not graze treated fields.

DEF 6 may be applied up to first frost but not within seven [7] days of picking.:

RECOMMENDED APPLICATIONS

CROP	Pints DEF 6 per A	Gallons Water per A		DIRECTIONS
		Air	Ground	
Cotton	1-1/3 to 2	5 to 10	15 to 25	COMPLETE DEFOLIATION Apply specified dosage per acre to give thorough coverage of leaves when 50% or more of the bolls are open. For LV/ULV application use not less than 1-1/2 pints per acre of once refined vegetable oil. For rank cotton, see below.
	1 to 1-1/2	-	10 to 15	BOTTOM DEFOLIATION Apply specified dosage (the rate should be proportional to the fraction of the plant to be defoliated) per acre with spray directed only to the lower part of the plant where mature bolls are found.
Rank Cotton	First Spray 2 Second Spray 1-1/2	5 to 10	15 to 25	RANK COTTON DEFOLIATION Apply specified dosage per acre to give thorough coverage of leaves when 50% or more bolls are open. Schedule second application of the specified dosage in 2 to 6 weeks for complete defoliation. One of the two DEF 6 applications, up to 2 pints per use season, may be made LV/ULV in not less than 1-1/2 pints per acre of once refined vegetable oil. Do not apply more than 3-1/2 pints of DEF 6 per acre in any crop season.
Long Staple (Pima) Cotton	2	5 to 10	15 to 25	PIMA COTTON DEFOLIATION Apply specified dosage as a tank-mix with 0.2 to 0.4 lb Dropp 50WP per acre. For best results, apply the combination to mature cotton plants with 60% or more open bolls.

DEF 6

Section II - Amendment Information

We have recently determined that although our current label for DEF 6 allows the use of up to 3 pints per acre on rank and long staple (Pima) cotton, the maximum rate being used is 2 pints per acre. Therefore, we are proposing to revise our DEF 6 registration by reducing the amount of product which can be applied per acre from 4-1/2 to 3-1/2 pints per acre per season. The enclosed proposed draft labeling, dated 6/17/91, has been revised as follows:

1. The Restrictions section and the directions for rank cotton in the Recommended Applications table now read, "Do not apply more than 3-1/2 pints of DEF 6 per acre in any crop season.
2. The rate of DEF 6 listed in the Recommended Applications table have been revised for rank cotton by limiting the first spray to 2 pints per acre and the second spray to 1-1/2 pints per acre.
3. The use rate on long staple (Pima) cotton has been limited to 2 pints per acre.

We request that the Agency waive the requirements of efficacy data for this application in accordance with the statutory authority conveyed by FIFRA, as amended.

Although we believe that no data are needed to review this submission, we have nevertheless included with this application a completed and signed "Certification with Respect to Citation of Data/General Offer to Pay" in compliance with PR Notice 85-3. As indicated, we are proceeding under the "Cite-All" method of support. The most recent list of pesticide data submitters, dated March 1990, shows that only Mobay has submitted data on S,S,S-tributyl phosphorotrithioate (Chemical No. 074801).

If, during the course of the Agency's review of this application, pertinent comments or questions arise, we would like to receive a copy of the actual review notes. Having a copy of the actual notes aids us in formulating timely replies to the Agency.