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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 10 10012

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

Subject: Drexel Antak

EPA Reg. No. 19713-18 Update in Label Language

Your Submission Dated March 30, 1993

Dear Ms. Brown:

The above update in the label language for the Drift, Reentry, Farmer Worker Safety, and Storage and Disposal statements submitted in connection with registration under FIFRA is acceptable.

The Environmental Hazard Statement will also have to be revised to comply with PR Notice 93-3. The statement should read: "For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark."

A copy of your label is enclosed for your records.

Sincerely yours,

Robert J. Taylor Product Manager (25) Fungicide-Herbicide Branch Registration Division (H7505C)

Enclosure

Q/

CONCURRENCES				
SYMBOL HISOS				
SURNAME) ((ULT)				}
DATE 16-8-93				



Antak

Tobacco Sucker Control Agent 504

ACTIVE INGREDIENT:

"Weight of Active ingredients is 5.72 pounds pergellen

WARNING/AVISO

PRECAUCIONAL USUARIO: Biusted no lee Ingles, no use este producto hacta que la atique la la haya sidoexplicado ampliamente.

READ ENTIRE LABEL BEFORE USING THIS PRODUCT. SHAKE WELL BEFORE USING.

EPA Reg. No. 19713-18 EPA Est. No. 19713-M8-1

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, avoid breathing of spray must. May cause irritation of nose, throat and skin. Causes substantial but tomporery eye injury. Do not get in eyes or on skin and clothing. Weer safety glasses. Wash thoroughly with scap and water after handling. Remove contaminated clothing and wash before rause. Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWE D: Call a physician or Poison Control Center Drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not evalable, drink large quantities of water. Avoid alcohol

IF IN EYES: Immediately Rush eyes with plenty of water. Get Medicatattention.

IF ON SKIN: Immediately, remove conteminated clothing, IN-CLUDING SHOES, and wash skin with soap and planty of water. If Irritation develops, send for a physician.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes.

GENERAL INFORMATION

ANTAK Tobacco Sucker Control Agent is a carefully balanced combination of active ingredients and waiting agents (surfactants) to be used for the control of sucker growth of all types of tobacco. The concentrated product is diluted with water to form a creamy emulsion which is applied as a coerse sprey. The emulsion is effective only when it comes in direct contact with suckers; therefore, the material is applied alone, or can be followed by a systemic sucker control egent in a dual treatment program. 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 REENTRY

Do not enter treated areas without protective clothing until sprays have dried

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information

FARMWORKERS SAFETY STATEMENT

Written or oral warnings must be given to workers who are expected to be in a treated erea or in an area about to be treated with this product. (Indicate specific oral warnings which inform workers of areas or fields that may not be antered without specific protective clothing, parted of time field must be vacated and appropriate actions to take in case of accidental exposure). When oral warnings are given, warnings shall be given in a language customerity understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: WARNING -- Area treated with Fatty Alcohols on (date of application). Do not enter without appropriate protective clothing until sprays have dried. In case of accidental exposure refer to Statement of Practical Treatment on Amak label.

TIME OF APPLICATION

Top tobacco plants at the late button to early flower stage and remove any suckers which have grown over one inch. Because Ai TAK 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.

The tobacco plants should be sprayed within two days after topping and removal of suckers. ANTAK can be applied anytime during the day until about 7:30 p.m.; however, best results are obtained when plants are sprayed in the moming after the dew has dried or in the afternoon when the plants have recovered from wilt. Some injury to the tender leaves at the top of the plant may result from application of ANTAK under bright sunlight at temperatures above 90°F. Injury may also result if ANTAK is applied to the underside of the tobacco leaf; thus, application in winds high enough to turn over the top leaves is not recommended. Do not apply during rain or to wet plants; however, if the material has been on the plants over an hour before being washed off by rain, reapplication should not be necessary.

NUMBER OF APPLICATIONS

In many cases, a single application of ANTAK is satisfactory to control both primary and secondary suckers. If secondary sucker growth appears vigorous, a second treatment 5 to 7 days after the initial treatment may be advantageous.

Excellent learquality can be obtained with the use of ANTAK alone in one or, where necessary, two epplications. Some growers favor a dual treatment using ANTAK first (at the late birtion stage) followed 1 to 2 weeks later with a systemic sucker control agent (Maleic Hydrazide) used in accordance with manufacturer's instructions.

TANK MIX DIRECTIONS FOR FLUE-CURED TOBACCO -- BUCKER CONTROL

ARTAK plus Super Sucker-Stuff: Mix 1% gallons ANTAK and 1% gallons Drexel Super Sucker-Stuff in 47 gallons of water for each acre. Maintain good agitation during mixing and whith spraying.

ANTAK plue Sucker-Stuff: Mix 1½ gallons -NTAK and 1 gallon Draxel Sucker-Stuff in 47 gallons of water for each acro. Maintein good agitation during mixing while spraying.

Method of Application: Use the "Tank Mix" of ANTAK and Super Sucker-Stuff or ANTAK and Sucker-Stuff at the body flower stage. Tobacco should be topped and suckers over 1 inch long removed. The spray mixture should be diminish to the upper to of the plant and the sprayer operated at low pressure, similar to that of a contact application. This will ensure that the droplets are large enough to, some of the mixture.



to run down the stalk. This "Tank Mix" usually follows a contact sucker control application applied in the button stage. Use normal spray precentions such as you would while applying contact control materials.

- NOTES 1. One application of the tank mix per growing season
 - 2 Do not harvest within 7 days of application
 - 3 All applicable directions, restrictions and precautions are to be followed

Rate of Application for Flue-cured Tobacco: ANTAK should be diluted at the rate of 3% vunces per gallon of water, or 1% gallons in 50 gallons of water per acre. When using ANTAK on derk tobacco, 7 to 8 ounces per gallon of water should be used

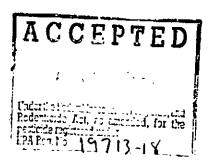
Rate of Application for Air-cured (Buriey, Maryland and Cigar) Tobacco: ANTAK should be diluted at the rate of 5 ounces ror gallon of water, or 2 gallons in 50 gallons of water. When applied by hand, 1 gallon of diluted ANTAK will treat 130 to 190 plants. If a power sprayer is used, 40 to 60 gallons of diluted product should be applied per acre of tobacco.

Mathed ef Application: The diluted emulsion is most easily prepared by edding the required emount of ANTAK 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 ANTAK RATHER THAN THE ANTAK TO THE WATER. If you use a hand-held or back pack sprayer, the diluted emulsion should be applied at the rate of 35 to 1 ounce per plant (or enough to ensure 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 be used.

When applied with POWER EQUIPMENT, three nozzles per row should be used (TG-3 full cone tips, or equivalent are recommended). One nozzle should be directed downward over the center of the row and one should be 9 inches on either side directed at or slightly above the center of the stalk. The diluted ANTAK should be applied to the topped tobacco as a coarse spray from a height of 12 to 16 inches above the top stalk. It is recommended that boom pressure be kept at 20 to 25 ibs. pressure, and operating at a tractor speed of 2½ to 3 mph, you will apply approximately 50 gallons of diluted emulsion per acre of tobacco.

CAUTION: If allowed to stand for extended periods of time, the diluted emulsion may separate. ALWAYS REMEMBER TO MIX WELL IMMEDIATELY BEFORE USING

In order to minimize the possibility of injury to the tobacco plants, do not mix ANTAK with other chemicals such as insecticides or herbicides or apply ANTAK to plants which have recently been treated with such chemicals. Be sure that all spray equipment has been carefully rinsed out prior to using. In BURLEY TOBACCO during prolonged periods of high heat and humidity or under other conditions which might favor the spread of hollow stalk or stem rot diseases, delay application of ANTAK until these conditions pass.



STORAGE AND DISPOSAL

Do not contaminate water, food, or feedby storage or disposal BTORAGE BERTRAIC TIONE: Storage should be undertock and key in a ventilated room and secure from access by unauthorized persons and children Storage should be inaccess by unauthorized persons and children Storage should be no containers by many heater (guillion source. Do not stack plastic containers (4 x 1 gat or 2 x 2½ gat) over 2 pallets high. Do not stack metal containers over 4 pallets high. Move containers by handles or cases. Do not move containers from one area to another unless they are securely sealed. Keep containers from one area to when not inuse. Keep away from any punctures outce. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Avoid contamination without dizing materials. Store inoriginal containers only. If the contexts are leaking or material is spilled follow these steps.

- Contain spill, absorbwith a material such as sawdust, clay granules or did
- 2. Collect and place in suitable containers for disposal.
- 3. Which are with water and soop to remover amaining essticide.
- 4. Followwashingwith cleanwater rinse.
- Place a leating container inplastic tuband transfer contents as soon as possible to an empty original container.
- 6. Do notaliow run off to enter sewer or contaminate water supplies.
- 7.Dispose ofwaste as indicated below:

PERTICEE DEFOUAL: Wastes resulting from the use of this product may be disposed of on site or at en approved waste disposed facility CONTABLER DISPOSAL: Plactic Containers — Triple rines (or equiva-

CONTABLE R DISPOSAL: Plactic Containers — Triple rinse (or equivalent). Then afferfor recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stayout of smoke.

WARRANTY -- CONDITION OF SALE

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 end/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sele by Drexel Chemical Company and is accepted as such by the Buyer.

ACCEPTED with COMMENTS in EPA Letter Dated:

JUN 10 lags

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the particide registered under EPA Rog. No.