



PM 25 19713-18 1877  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 10 1994

Barbara Brown  
DREXEL CHEMICAL COMPANY  
P.O. BOX 9306  
MEMPHIS, TN. 38109

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 7/22/93 In Response to PR Notice 93-7  
EPA Reg. No. 19713-18  
ANTAK TOBACCO SUCKER CONTROL AGENT 504

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable  
Printed with Soy/Canola ink on paper that  
contains at least 50% recycled fiber

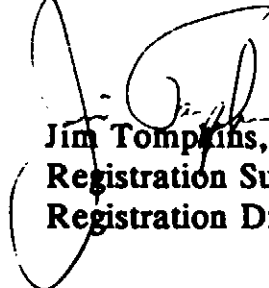
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Barbara Brown  
DREXEL CHEMICAL CO  
BOX 9305  
MEMPHIS TN 38109

Comment for: EPA Reg Nr.19713-18  
ANTAK TOBACCO SUCKER CONTROL AGENT 504

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

Correct the typographical errors circled on your proposed label.

DREXEL

ANTAK  
Tobacco Sucker Control Agent

ACTIVE INGREDIENT:

n-Decanol (Fatty alcohol C <sub>10</sub> -100%)*.....	79%
INERT INGREDIENT:.....	21%
TOTAL:.....	100%

\*Weight of Active Ingredients is 5.72 pounds per gallon

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 this label, find someone to explain it to you in detail.)

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

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

Net Contents: 20 Liters

Revisions 7/93

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 10 1994

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

19713-18

STATEMENT OF PRACTICAL TREATMENT

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

IF IN EYES: Immediately flush eyes with plenty of water. Get Medical attention.

IF ON SKIN: ~~Immediately remove contaminated clothing, INCLUDING SHOES, and~~ wash skin with soap and plenty of water. If irritation develops, send for a physician.

BEST AVAILABLE COPY

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Harmful if swallowed, avoid breathing of spray mist. May cause irritation of nose, throat and skin. Causes substantial but temporary eye injury. Do not get in eyes or on skin and clothing.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators and other handlers must wear:

Coveralls over short-sleeved shirt and short pants

Waterproof gloves

Chemical-resistant footwear plus socks

Protective eyewear

Chemical-resistant headgear for overhead exposure

Chemical-resistant apron when cleaning equipment, mixing or loading.

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/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS**

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**

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. 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 wetting 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 coarse spray. 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 agent in a dual treatment program.

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**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), notification to workers, 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.

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 over short-sleeved shirt and short pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

**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 ANTAK 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.

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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 morning 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 leaf quality can be obtained with the use of ANTAK alone in one or, where necessary, two applications. Some growers favor a dual treatment using ANTAK first (at the late button 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 - SUCKER CONTROL**

ANTAK plus Super Sucker-Stuff: Mix 1½ gallons ANTAK and 1½ gallons Drexel Super Sucker Stuff in 47 gallons of water for each acre. Maintain good agitation during mixing and while spraying.

ANTAK plus Sucker-Stuff: Mix 1½ gallons ANTAK and 1 gallon Drexel Sucker Stuff in 47 gallons of water for each acre. Maintain good agitation during mixing and while spraying.

Method of Application: Use the "Tank Mix" of ANTAK and Super Sucker Stuff or ANTAK and Sucker Stuff at the early flower stage.

Tobacco should be topped and suckers over 1 inch long removed. The spray mixture should be directed to the upper 1/3 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 for 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 precautions 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 3-3/4 ounces per gallon of water, or 1 1/2 gallons of water per acre. When using ANTAK on dark tobacco, 7 to 8 ounces per gallon of water should be used.

**Rate of Application for Air-cured (Burley, Maryland and Cigar) Tobacco:** ANTAK should be diluted at the rate of 5 ounces per 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.

**Method of Application:** The diluted emulsion is most easily prepared by adding the required amount 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 2/3 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 lbs. pressure, and operating at a tractor speed of 2 1/2 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 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 any heat or ignition source. 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 container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Avoid contamination with oxidizing materials. Store in original containers only. If the contents are leaking or material is spilled follow these steps:

1. Contain spill, absorb with a material such as saw dust, clay granules or dirt.
2. Collect and place in suitable containers for disposal.
3. Wash area with water and soap to remove remaining pesticide.
4. Follow washing with clean water rinse.
5. Place a leaking container in plastic tub and transfer contents as soon as possible to an empty original container.
6. Do not allow run off to enter sewer or contaminate water supplies.
7. Dispose of waste as indicated below:

**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:** Metal - triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**PLASTIC CONTAINERS** - triple rinse (or equivalent). Then offer for 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, stay out 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 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.