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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OCT 12 1999

Mr. Luz G. Piwonka
Drexel Chemical Company
1700 Channel Avenue
Post Office Box 13327
Memphis, Tennessee 38113-0327

Subject: Antak Tobacco Sucker Control Agent
EPA Registration No. 19713-18
Your label amendment dated August 2, 1999

Dear Mr. Piwonka,

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable, provided that you comply with the following conditions.

1. In the "Time of Application" section on the label, you must reinstate recommendations indicating the timing of applications in relation to the growth stage of the tobacco or size of suckers. Also include recommendations regarding topping.
2. Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration may be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,



Cynthia L. Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Attachment: Label stamped "ACCEPTED with COMMENTS"

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Antak[®]

Tobacco Sucker Control Agent

ACTIVE INGREDIENT:
n-Decanol (Fatty alcohol C₁₀-100%)* 79.0%

OTHER INGREDIENTS: 21.0%

TOTAL: 100.0%

*Weight of active ingredient 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 the label, find someone to explain it to you in detail.)

See **FIRST AID** Below

SHAKE WELL BEFORE USING

EPA Reg. No. 19713-18
EPA Est. No. 19713-GA-1 Net Contents: _____

FIRST AID

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: Wash skin with soap and plenty of water. If irritation develops, send for a physician.

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING: 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 and chemical-resistant apron when cleaning equipment, mixing or loading.
Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this products 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

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) 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 is a carefully balanced combination of active ingredients and wetting agents (surfactants) to be used for the control of sucker growth on 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 spray should wet the sides of the Tobacco stalk and contact all small, immature suckers. Because this product 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. This material can be applied alone or may be followed by a systemic sucker control agent 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.** 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, 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 in this labeling about personal protective equipment (PPE), restricted entry intervals (REI) and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

Do not enter or allow worker entry into treated areas during the restricted entry interval 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, soil or water is: Coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, protective eyewear and chemical-resistant headgear for overhead exposure.

TIME OF APPLICATION
This product 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 this product under bright sunlight at temperatures above 90°F. Injury may also result if this product 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.



Manufactured By:
Drexel Chemical Company
P.O. BOX 13327, MEMPHIS, TN 38113-0327
SINCE 1972

RATE OF APPLICATION

Flue-cured Tobacco: This product should be diluted at the rate of 3 1/4 fluid ounces in 1 gallon of water or 1 1/2 gallons of this product in 48 1/2 gallons of water to total 50 gallons of spray solution. To prepare a smaller amount, use 1 pint of this product in 3 gallons of water to treat 470 to 490 Tobacco plants.

Air-cured Tobacco (Burley, Cigar and Maryland): This product should be diluted at the rate of 5 fluid ounces in 1 gallon of water or 1 1/2 to 2 gallons of this product in 48 gallons of water to total 50 gallons of spray solution.

Dark Tobacco: This product should be diluted at the rate of 7 to 8 fluid ounces in one gallon of water or 2 3/4 gallons of this product in 47 1/2 gallons of water to total 50 gallons of spray solution.

Note: When applied by hand, 1 gallon of this diluted product will treat 130 to 190 Tobacco plants. If a power sprayer is used, 40 to 60 gallons of diluted product should be applied per acre of Tobacco.

MIXING INSTRUCTIONS

The diluted emulsion is most easily prepared by adding the required amount of this product 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 PRODUCT RATHER THAN THIS PRODUCT TO THE WATER.

APPLICATION EQUIPMENT

When applied with a hand-held or back pack sprayer: the diluted emulsion should be applied at the rate of 1/2 to 1 ounce of spray solution 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 psi be used. Be sure the solution is thoroughly mixed before application begins and maintain agitation during application.

When applied with power spray equipment: Three nozzles per row should be used (TG-3, TG-5 and TG-3 full cone tips, or equivalent are recommended). One nozzle should be directed downward over the center of the row and the other two should be 9 inches on either side, directed at or slightly above the center of the stalk. This product, diluted should be applied 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 psi (never to exceed 30 psi) 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. When a power sprayer is used, be sure the solution is thoroughly mixed before application begins and maintain agitation during application.

Precaution: If allowed to stand for extended periods of time, the diluted emulsion may separate. ALWAYS REMEMBER TO MIX WELL IMMEDIATELY BEFORE USING. Be sure the solution is thoroughly mixed before application begins and maintain agitation during application. All sprayers should be equipped with a pressure regulator and a pressure gauge.

Application Notes:

1. Application of this product at concentrations higher than recommended may cause leaf damage.
2. Be sure spray equipment is clean prior to use.
3. After adding this product to the spray tank, start up and maintain good agitation of the diluted solution.
4. Do not mix this product with other Tobacco chemicals, except as specified in this label (See "TANK MIX APPLICATIONS").
5. Do not apply this product to wet plants, such as immediately after heavy rain or when there is a heavy dew.
6. Do not apply on windy days, since the spray solution may not be deposited uniformly on the leaf axils and sucker buds.
7. Do not spray during the middle of the day in very hot weather, since leaf burn may occur. Injury may also result if the product is sprayed on the underside of the Tobacco leaf, such as when the wind is strong enough to turn over the top leaves.
8. In order to minimize the possibility of injury to the Tobacco plants, do not mix this product with other chemicals such as insecticides or herbicides or apply this product to plants which have recently been treated with such chemicals.
9. 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 this product until these conditions pass.

NUMBER OF APPLICATIONS

In many cases a single application of this product 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 this product alone in one or, where necessary, two applications. Some growers favor

a dual treatment using this product 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.

ADDITIONAL TREATMENT PROGRAMS

Flue-Cured Tobacco: If sucker growth is vigorous or if the development of the Tobacco in the field is irregular, second and third applications of this product, at 3 to 5 day intervals, may be needed. For these additional applications, use 1 1/2 gallons of this product in 48 1/2 gallons of water per acre to total 50 gallons of spray solution. Seven to 10 days after the last application of this product, apply Super Sucker-Stuff[®], Sucker-Stuff or Sucker-Stuff 60 WS at the labeled rate and timing.

Air-Cured (Burley, Cigar or Maryland): Application of this product may be followed in 7 to 10 days by Super Sucker-Stuff, Sucker-Stuff or Sucker-Stuff 60 WS at the labeled rate and timing. If a systemic material is not used, a second application of this product may be made in 5 to 7 days after the first application.

TANK MIX APPLICATIONS

Flue-Cured Tobacco: A tank mixture of this product plus Super Sucker-Stuff, Sucker-Stuff or Sucker-Stuff 60 WS may be applied to Flue-cured tobacco at the early flower growth stage. This tank mix usually follows application of a contact sucker control agent. The Tobacco should be topped and all suckers over one inch long removed, before treatment. The spray mixture should be directed to the upper 1/2 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. Use normal spray precautions such as those you would use 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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: 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 containers over 2 pallets high. Move containers by handles or cases. Do not move containers from one area to another unless they are securely sealed. Keep containers 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 soap and water 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 runoff 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: 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 Manufacturer 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. The foregoing is a condition of sale by Seller and is accepted, in full, by the Buyer.

ACCEPTED with COMMENTS
In EPA Letter Dated:

OCT 12 1999

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

19913-18