

19713-287

5/29/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Luz G.Chan
Drexel Chemical Company
1700 Channel Avenue
P.O. Box 13327
Memphis, TN 38113-0327

MAY 24 2011

Subject: Sucker-Terminator Concentrate
EPA Reg. No. 19713-287
Your letter dated May 20, 2011
EPA Decision Number: 449457

Dear Ms. Chan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to: 1) update the REI to 24 hours; 2) update the ingredient statement to reflect the Agency's recent redefinition of the active ingredients; and 3) make general label improvements, is acceptable.

A stamped copy of the label "Accepted" is enclosed for your records. This label supersedes all other previously accepted labels. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions please contact Heather Garvie by phone at: 703-308-0034 or via email at: garvie.heather@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Tony Kish".

Tony Kish
Product Manager 22
Fungicide Branch (7504P)
Registration Division

Enclosed: Stamped "Accepted" label

ACCEPTED
MAY 24 2011
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under
 EPA Reg. No. 19713-287



Sucker-Terminator
 Concentrate

Tobacco Sucker Control Agent

ACTIVE INGREDIENTS:

- Fatty Alcohols..... 85.0%
 - Octanol (C₈) - 36.35%
 - Decanol (C₁₀) - 48.39%
 - Related Compounds (Dodecanol - C₁₂) - 0.26%

OTHER INGREDIENTS: 15.0%

TOTAL: 100.0%

This product contains 6.04 pounds of active ingredients per gallon.

KEEP OUT OF REACH OF CHILDREN
DANGER / PELIGRO

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

EPA Reg. No. 19713-287
 EPA Est. No. 19713-XX-XXX

Net Content: _____

FIRST AID
<p>IF IN EYES:</p> <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
<p>IF ON SKIN OR CLOTHING:</p> <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
<p>IF SWALLOWED:</p> <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious or convulsing person.
<p>IF INHALED:</p> <ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.</p>
<p>Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.</p>

287SP-0511*P

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye injury. Causes skin irritation. Do not get in eyes, on skin or on clothing. Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, refer to Category C on EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, and other handlers must wear: Protective eyewear (goggles or eyeshield), coveralls over a short-sleeved shirt and short pants, chemical-resistant gloves made of any waterproof material (butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton), socks, chemical-resistant footwear, a chemical-resistant apron when mixing/loading or cleaning equipment, and chemical-resistant headgear for overhead exposure.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE 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

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 washwaters or rinsate.

USE INFORMATION

SUCKER-TERMINATOR CONCENTRATE is a carefully balanced combination of active ingredients and wetting agents (surfactants) to be used for the control of sucker growth on Burley, Flue-cured and Dark 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. This product can be used alone, or can be followed by a systemic sucker control agent in a dual treatment program on Flue-cured or Burley tobacco.

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 (WPS), 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 on this label about personal protective equipment (PPE) and restricted entry interval (REI). The requirements in this box only apply to uses of this product that are covered by the WPS.

Do not enter or allow worker entry into treated areas during the REI of 24 hours.

PPE required for early entry to treated areas that is permitted under the WPS and that involves contact with anything that has been treated, such as plants, soil or water is: Protective eyewear (goggles or faceshield), coveralls over short-sleeved shirt and short pants, chemical-resistant gloves made of waterproof material (such as butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton), socks, chemical-resistant footwear, and chemical-resistant headgear for overhead exposure.

TIME OF APPLICATION

This product may be applied either before or after topping at the button to early flower stage. However, best results are usually obtained by making the first contact application to Tobacco with this product before topping, as soon as 50 to 60 percent of the plants have a visible button. The floral parts help to intercept sprays to increase sucker kill in the upper leaf axils. Top plants that are ready for topping as soon as possible after first application. This product is usually more effective if applied 3 to 5 days apart when humidity is low and leaf axils are fully exposed – that is, generally between 10:00 A.M. and 6:00 P.M. on sunny days, except when the plants are wilted and temperatures exceed 90°F. Some injury to the tender leaves at the top of the plant may result from the 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 a rain or irrigation, reapplication should not be necessary.

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, follow-up treatments on Flue-cured or Burley tobacco 3 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 more applications. Some growers favor a dual treatment using this product first (at the button stage) followed 1 to 2 weeks later with a systemic sucker control agent (maleic hydrazide such as Sucker-Stuff® and Sucker-Stuff® 80EG) used in accordance with manufacturer's instructions. If this dual treatment method is used, an application rate of 2 gallons of this product per 50 gallons of spray solution is adequate.

DO NOT apply this product more than seven times per crop.

RATE OF APPLICATION

For use on Flue-cured and Burley tobacco, the first application of this product should be diluted at the rate of 4 to 5 ounces per gallon of water or 1.75 to 2 gallons per 50 gallons of spray solution. For Flue-cured tobacco, the rate of this product for the second application may be increased to 2.5 gallons per 50 gallons of spray solution, about 3 to 5 days following the first application, unless plants are tender. For extended sucker control, this product may be applied as needed, but not to exceed 7 times per crop, at the rate of 2.5 gallons per 50 gallons of spray solution 3 to 4 weeks after maleic hydrazide has been applied. When using this product on Dark tobacco, 7 to 8 ounces per gallon of water or 2.5 to 3.5 gallons per 50 gallons of spray solution should be used. Use the lower rates when optimum growing conditions exist and leaves are tender. When applied by hand, 1 gallon of this product, diluted, will treat approximately 250 plants. If a power sprayer is used, 50 gallons of diluted spray solution should be applied per acre of Tobacco.

METHOD OF APPLICATION

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 the product to the water.

If you use a hand-held or backpack sprayer, the diluted emulsion should be applied at a rate of 0.66 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 about 20 pounds per square inch (psi) be used. When applied with power equipment, *three nozzles per row* should be used (TG-3, TG-5 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 top of the stalk. The diluted product should be applied to the topped Tobacco as a coarse spray from a height of 12 to 16 inches above the top of the stalk. It is recommended that boom pressure be kept at 20 to 25 psi and should never exceed 30 psi. By using the recommended spray tips, spraying at 20 to 25 psi pressure and operating at a tractor speed of 2.5 to 3 mph, you will apply approximately 50 gallons of diluted emulsion per acre of Tobacco.

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 this product with other chemicals such as insecticides or herbicides or apply this product 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 this product until these conditions pass.

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 sawdust, 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:

Nonrefillable Container (rigid material; less than 5 gallons): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container one-fourth 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. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid material; 5 gallons or greater): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Containers: Refillable container. 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% 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 rinsing procedure two more times.

WARRANTY—CONDITIONS OF SALE

OUR DIRECTIONS 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. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith. To the extent consistent with applicable law, in no case shall the 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 given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

Manufactured By:
DREXEL CHEMICAL COMPANY
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