



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 30, 2023

Anna Hale
Registration Manager
Drexel Chemical Company
P.O. Box 13327
Memphis, TN 38113-032

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment –Adding an
NOP Claim to the Label
Product Name: Sucker Terminator Concentrate
EPA Registration Number: 19713-287
Application Date: 5/18/22
Salesforce Case Number: 00412618

Dear Ms. Hale:

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

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company’s website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration

Page 2 of 2

EPA Reg. No. 19713-287

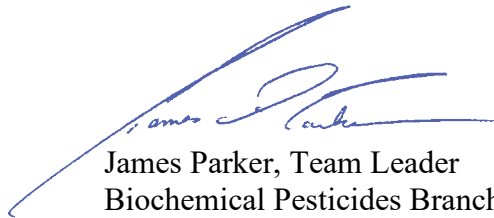
Salesforce Case No. 00412618

process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Chris Pfeifer of my team by phone at (703) 244-7991 or via email at pfeifer.chris@epa.gov.

Sincerely,



James Parker, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

ACCEPTED

Jan 30, 2023

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

Drexel

Contact

Sucker Terminator

Concentrate

Tobacco Sucker Control Agent.  FOR ORGANIC PRODUCTION.

ACTIVE INGREDIENTS:

| | |
|--|-------|
| Fatty Alcohols | 85.0% |
| Octanol (C ₈) – 36.35% | |
| Decanol (C ₁₀) – 48.39% | |
| Related Compounds (Dodecanol – C ₁₂) – 0.26% | |

| | |
|---------------------------------|--------|
| OTHER INGREDIENTS: | 15.0% |
| TOTAL: | 100.0% |

This product contains 6.04 pounds of active ingredient 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

Net Content:

EPA Est. No. 19713-XX-X _____ Gals. (_____ L)

FIRST AID

IF IN EYES:

- 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.

IF ON SKIN OR CLOTHING:

- 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.

IF SWALLOWED:

- 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 to an unconscious or convulsing person.

IF INHALED:

- 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 800-424-9300 for emergency medical treatment information.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

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 an 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.

PRODUCT 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 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 the suckers. Wet the sides of the Tobacco stalk with the spray and contact all small, immature suckers. This product is a contact material, thus, if plants are leaning, it is necessary to straighten those plants so the emulsion flows down the stalk evenly and contacts each sucker axil or sucker bud. This material can be used alone or may be followed by a systemic sucker control agent in a dual treatment program.

Manufactured By:

Drexel Chemical Company

P.O. Box 13327, Memphis, TN 38113-0327

SINCE 1972

The DREXEL logo is a registered trademark of Drexel Chemical Company.

287SP-0123*

SUCKER TERMINATOR Page 1 of 3

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 face-shield), 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. Best results are usually obtained by making the first application before topping and as soon as 50 to 60% of the plants have a visible button. Floral parts help to intercept sprays increasing sucker control in the upper leaf axils. Remove Tobacco plant terminals that are in the elongated button stage as soon as possible after the first application. This product is most effective when applied at 3 to 5 day intervals and when humidity is low and leaf axils are fully exposed.

Optimum time for application is generally between 10:00 A.M. and 6:00 P.M. on sunny days. The best results are obtained when plants are sprayed in the morning after the dew dries or in the afternoon when the plants have recovered from wilt. Some injury may occur to tender leaves at the top of the plants from an application of this product under bright sunlight at temperatures above 90°F. Injury may result if this product is applied to the underside of Tobacco leaves during high winds sufficient enough to turn leaves and such applications are not recommended. Do not apply during rain or to wet plants. If this material has been applied to Tobacco plants for over one hour prior to rain or irrigation, reapplication should not be necessary.

MIXING INSTRUCTIONS

The diluted emulsion is most easily prepared by adding the required amount of this product into the spray tank one-half filled with water using mild agitation. Then add sufficient water to the spray tank to total the required minimum solution.

Note: In order to minimize the possibility of injury to Tobacco plants, do not mix this product with other Tobacco chemicals such as insecticides, fungicides and herbicides or apply this product to plants that have recently been treated with such chemicals.

RATE OF APPLICATION

Flue-cured and Burley Tobacco: For the first application, dilute this product at the rate of 1.75 to 2 gallons in sufficient water to total a minimum of 50 gallons spray solution. For the second application in Flue-cured tobacco, the rate of this product may be increased by diluting 2.5 gallons in sufficient water to total a minimum of 50 gallons spray solution 3 to 5 days after the first application. 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 in sufficient water totaling a minimum of 50 gallons of spray solution.

Dark, Cigar and Maryland Tobacco: Dilute this product at the rate of 2 to 2.5 gallons in sufficient water totaling a minimum of 50 gallons of spray solution. Apply the specified lower rate when optimum growing conditions exist and leaves are tender. Otherwise, apply the specified higher rate. When applied by hand, 1 gallon of diluted product will treat approximately 250 plants. If a power sprayer is used, apply a minimum of 50 gallons spray solution per acre.

METHODS OF APPLICATION

Hand Application

This product may also be applied with hand-held equipment or with backpack sprayer. Apply as a coarse spray directed downward at the top of the stalk from 6 to 8 inches above the top leaves. Low tank pressure is required and in no case should more than about 20 to 25 pounds per square inch (psi) be used.

Powered Spray Equipment

Broadcast Application: When applying as a broadcast spray or straight boom application, use one nozzle directed over the center of the row and one nozzle directed over the center of the row-middle (TG-3, TG-5 full cone tips or equivalent). Maintain a coarse spray using 25 to 35 psi boom pressure. By using TG-3 spray tips, spraying at 25 to 35 psi pressure and operating at a speed of 1.5 to 3 mph, apply in a minimum of 50 gallons of diluted emulsion per acre of Tobacco. By using TG-5 spray tips, spraying at 25 to 35 psi pressure and operating at a speed of 3 to 5 mph, apply a minimum of 50 gallons of diluted emulsion per acre of Tobacco. Apply the diluted product to Tobacco as a coarse spray from a height of 12 to 16 inches above the top of the stalk.

Directed Application (3 Nozzles): When applying as a directed spray, use three nozzles per row (TG-3, TG-5 full cone tips or equivalent). Direct one TG-5 nozzle downward over the center of the row and TG-3 nozzles (9 inches on each side) directed at or slightly above the top of the stalk. Keep boom pressure at 20 to 25 psi and should never exceed 30 psi. By using TG-3, TG-5 spray tips, spraying at 20 to 25 psi pressure and operating at a speed of 2.5 to 3 mph, apply a minimum of 50 gallons of diluted emulsion per acre of Tobacco. Apply the diluted product to Tobacco as a coarse spray from a height of 12 to 16 inches above the top of the stalk.

Use Precautions: If allowed to stand for extended periods of time, the diluted emulsion may separate. Always remember to mix well immediately before using 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 specified 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 apply this product to wet plants, such as immediately after heavy rain or irrigation or when there is a heavy dew present.
5. Do not apply on windy days since the spray solution may not be deposited uniformly on the leaf axils and sucker buds.
6. Do not spray during excessive temperatures in excess of 95°F or the middle of the day during heat stress 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 top leaves.
7. In Burley tobacco, during prolonged periods of high heat and humidity or under other conditions favoring the spread of hollow stalk or stem rot diseases, delay application of this product until these conditions pass.
8. Closely hand-suckered or Tobacco treated with this product will not ripen as rapidly as poorly suckered Tobacco. Also, under some conditions, tips treated with this product have a tendency to turn yellow prematurely. This is not harmful and does not mean that your Tobacco is ripe. Therefore, do not harvest Tobacco treated with this product by using time and color of the leaves as your only guide to ripeness. Use other characteristics indicative of ripeness such as (a) fading of color from midrib and (b) change in apparent leaf texture.
9. Do not harvest within 7 days of application.

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, prompt follow-up treatments within 3 to 5 days after the initial treatment may be advantageous. Excellent leaf quality can be obtained with the use of this product when applying sequential applications.

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

STORAGE AND DISPOSAL

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

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 on site or at an approved waste disposal facility.

CONTAINER HANDLING:

Nonrefillable Container (rigid material; ≤ 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 up to < 250 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. 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 Container (≥ 250 gals. & Bulk): 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.

The DREXEL logo is a registered trademark of Drexel Chemical Company.