



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

MAR 24 1994

Harley D. Hathaway
COCHRAN CORPORATION
BOX 14603
MEMPHIS, TN 38114

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 12/20/93 in Response to PR Notice 93-7
EPA Reg. No. 57582-3
OFF-SHOOT-T 85

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

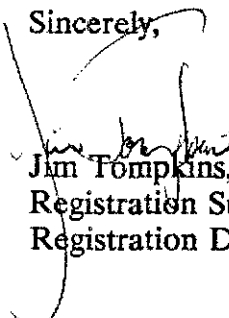
Submit the final printed labeling via the U.S. Postal Service to:

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

395

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Harley D. Hathaway
COCHRAN CORPORATION
57582-3 12/20/93
OFF-SHOOT-T 85
Original Submission

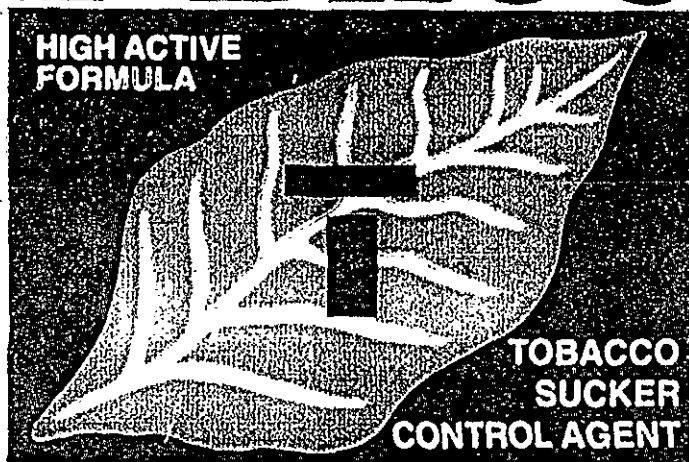
User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

The Agricultural Use Requirements section must be located in a clearly separate box on the product labeling -- with lines or other graphic indicators (such as contrasting color) to separate the section from the surrounding text.

Correct the typographical errors circled on your proposed label.

58h

Off-Shoot-T[®]



WARNING

May cause eye damage.
In case of eye contact, wash with water for at least 15 minutes and consult a physician. Avoid contact with skin and clothing.

Sold by:

 2227 DEARBORN
P.O. BOX 100
MEMPHIS, TN 38101
Cochran Corporation

Net Contents

EPA Registration No. 5905-AR-1
EPA Est. 5905-AR-1

Keep out of reach of children. **WARNING:** See statement on side panel.

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.)

Composition: Active Ingredients: Fatty Alcohols 85%
(C₆-0.5%; C₈-42%; C₁₀-56%; C₁₂-1.5%)

Net Contents: 2 U.S. Gallons

Inert Ingredients 15%
Weight of Active Ingredients:
6.01 lbs. per gallon

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 24 1994

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

57582-3

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 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) and restricted entry interval. The requirements in this box only apply to users 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. PPE 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:

Overalls
Waterproof gloves
Shoes plus socks
Protective eyewear

OFF-SHOOT-T is a carefully balanced combination of active ingredients and wetting agents to be used for the control of sucker growth on Burley, Flue-Cured, Dark, Maryland and Cigar 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.

DIRECTIONS FOR APPLICATION

When to Apply

OFF-SHOOT-T can be applied before or after topping. Best results are usually obtained by spraying the tobacco with OFF-SHOOT-T before topping in the early to late button stage and then topping the tobacco within a few days, removing any suckers that were missed. If you top the tobacco plants before spraying, remove any suckers over one inch in length as you top and apply OFF-SHOOT-T immediately after topping. Because OFF-SHOOT-T 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.

OFF-SHOOT-T can be applied any time during the day. For best results, it is recommended that you wait until the dew dries before spraying. Do not spray after the leaves begin to close in the evening. Because the underside of the leaves may be injured by contact with OFF-SHOOT-T, do not apply when the wind is high enough to turn top leaves over. Do not apply during the rain or when plants are wet. If, however, it rains after OFF-SHOOT-T has been on the plants for over an hour, you should not have to apply OFF-SHOOT-T again. How Much OFF-SHOOT-T to Apply

Flue-Cured: For Power Sprayer—use 1-1/2 - 2-1/2 gallons in 50 gallons of water.
For Hand Sprayer—use 4 - 6 ounces per gallon of water.
Burley: For Power Sprayer—use 1-3/4 - 2.0 gallons in 50 gallons of water.
For Hand Sprayer—use 4 - 5 ounces per gallon of water.
Dark: Use 6 - 8 ounces per gallon of water to apply with hand sprayer.
Cigar: Use 4 - 5 ounces per gallon of water to apply with hand sprayer.
Maryland: Use 4 - 4-1/2 ounces per gallon of water to apply with hand sprayer.

When applied by hand, 1 gallon of diluted OFF-SHOOT-T will treat approximately 190 plants. If a power sprayer is used, 40 - 60 gallons of diluted product should be applied per acre of tobacco.

How to Apply

The diluted emulsion is most easily prepared by adding the required amount of OFF-SHOOT-T 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 OFF-SHOOT-T rather than OFF-SHOOT-T to the water.

If you use a hand-held or back-pack sprayer, the diluted emulsion should be applied at a rate of 2/3 to 1 ounce per plant (or enough to insure run down to the bottom of the plant). A coarse spray is recommended, directed downward at the top of the stalk from 6 - 8 inches above the top leaves. Very little tank pressure is required, and in no case should more than about 20 pounds be used.

When applied with power equipment, three nozzles per row should be used (TG-3 full-cone tips, or equivalent is satisfactory). Replacing the center TG-3 nozzle with a TG-5 full-cone nozzle, which provides more spray solution down the stalk, is also 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 OFF-SHOOT-T should be applied to the tobacco as a coarse spray at a height of 12 - 16 inches above the top of the stalk. It is recommended that boom pressure be kept at 20 - 25 lbs., and should never exceed 25 lbs. By using the recommended spray tips, spraying at approximately 20 lbs. pressure, and operating at a tractor speed of 2.5 - 3 mph., you will apply approximately 50 gallons of diluted emulsion per acre of tobacco.

How Often to Apply

In many cases a single application of OFF-SHOOT-T is satisfactory to control both primary and secondary suckers. On uneven tobacco or if secondary sucker growth appears vigorous, 2nd and 3rd applications 3 to 5 days apart may be advantageous. It is often best to use a 5% concentration (2.5 gallons in 50 gallons of water) for these secondary applications. To avoid using more than the recommended rate of maleic hydrazide (MH), a 5% application of OFF-SHOOT-T can also be made 3 to 4 weeks after applying MH. This application should be made when suckers are less than one inch in length, or suckers longer than one inch should be removed by hand.

Some growers of Burley, Flue-Cured, and Dark tobacco may favor a dual treatment using OFF-SHOOT-T first (at the early button stage) followed 1 - 2 weeks later with a systemic sucker control agent (maleic hydrazide) used in accordance with manufacturer's instructions. If this dual treatment is used on Burley or Flue-Cured tobacco, an application rate of 1-1/2 - 2 gallons of OFF-SHOOT-T in 50 gallons of water is adequate. If this dual treatment is used on Dark tobacco, OFF-SHOOT-T should be used at the rate of 6 - 9 ounces per gallon of water to apply by hand sprayer.

Attention

If allowed to stand for extended periods of time (over 30 minutes), the diluted emulsion may separate. Always remember to mix well prior to use.

DO NOT MIX OFF-SHOOT-T WITH OTHER CHEMICALS SUCH AS INSECTICIDES OR DEFOLIANTS. Do not apply to tobacco plants which have recently been treated with other chemicals. Be sure that all spray equipment has been carefully cleaned prior to using.

In Burley tobacco, during prolonged periods of high heat and humidity and under other conditions, which may favor the spread of hollow stalk or dry rot diseases, delay application of OFF-SHOOT-T until these conditions pass.

Do not contaminate water by cleaning of equipment or disposal of wastes.

Do not reuse container. Destroy when empty.

NOTICE

The concentrations and application techniques recommended above have been found to control suckers with little or no leaf injury. Concentrations, application rates, sprayer pressures, and time of application other than those recommended may lead to inadequate sucker control and/or injury to the tender upper leaves of the plant. Neither Cochran Corporation, nor the seller, makes any representation or warranty, express or implied, as to this product other than contained on the label thereof, and buyer assumes all responsibility of personal injury, property damage, or other loss resulting from use, handling or storage of the product, and accepts and uses the material on these conditions.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS (& DOMESTIC ANIMALS)

WARNING

May cause eye damage. Do not get in eyes, on skin, or on clothing. Harmful if swallowed. Avoid inhalation of mist. In case of eye contact, flush thoroughly with water for at least 15 minutes. Call a physician.

Personal Protective Equipment (PPE):
Applicators and other handlers must wear:

Protective eyewear
Long-sleeved shirt and long pants
Waterproof gloves
Shoes plus socks

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:
Users Should:

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

Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL

Storage: Store in clean dry area where containers will not be crushed or punctured. Keep containers closed. If leakage or spills occur, avoid splashing concentrated product in eyes. Excess product may be soaked up with absorbent material and incinerated when permitted. Wastes resulting from the use of this product may be disposed of on site or in an approved waste disposal facility. Do not contaminate water, food or feed by storage or disposal.

Container Disposal: Triple rinse (or equivalent), puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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contains at least 50% recycled fiber

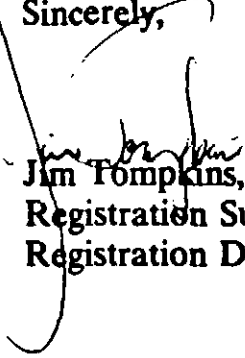
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U.S. Environmental Protection Agency
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1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,


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

Attachment

Harley D. Hathaway
COCHRAN CORPORATION
57582-3 12/20/93
OFF-SHOOT-T 85
Original Submission

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Correct the typographical errors circled on your proposed label.

Off-Shoot-T.®

HIGH ACTIVE
FORMULA



TOBACCO
SUCKER
CONTROL AGENT

Keep out of reach of children WARNING: See statement on side panel.

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.)

Composition: *Active Ingredients:* Fatty Alcohols 85%
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Weight of Active Ingredients:
6.01 lbs. per gallon

WARNING:

May cause eye damage.
In case of eye contact,
wash with water for at least 15 minutes.
Consult a physician. Avoid getting this product in the eyes.

Sold by:

 2227 DEADWOOD
P.O. BOX 14
MEMPHIS, TN 38101
Cochran
Corporation

Net Contents:

EPA Registration No. 571-01-00001
EPA Est. 5905-AR-1

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 24 1994

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

57582-3