

9468-32

6/23/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 23 2005

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Heather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Services Group, Inc
1101 17th Street, NW, Suite 500
Washington, DC 20036

Dear Ms. Bjornson:

Subject: Kull 50S (Supplementals for Aerial Application in Fresno County, CA and MS
EPA Registration No. 9468-32
Your Application Dated June 17, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following change before you release the product for shipment.

-Add the phrase "EPA Registration No. 9468-33" to your label.

A stamped copy of labeling is enclosed for your records.

Supplemental labeling must be incorporated into a master label and copies of the master label submitted to the Agency for our files at your next printing or within two years from the date of acceptance of supplemental labeling, whichever comes first. The Agency will consider a convincing argument as to why a supplemental label should not appear on a master label on a case by case basis.

Sincerely,

Vicki K Walters for
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505C)

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SUPPLEMENTAL LABELING
FOR AERIAL APPLICATION IN FRESNO COUNTY, CALIFORNIA ONLY
For Aerial Application outside Fresno County, CA, refer to
KULL 50 S Container label and booklet.

[Alternate Brand Name: KULL 50]

KULL 50 S
EPA Reg. No. 9468-

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUN 23 2005

READ AND FOLLOW THE ENTIRE LABEL FOR KULL 50 S BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 9468-32

"Label" refers to the container label and booklet for KULL 50 and this supplemental.

Keep Out of Reach of Children
CAUTION

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

This label must be in the possession of the user at the time of the herbicide application in Fresno County, California.

See "GENERAL INFORMATION", "MIXING", "APPLICATION EQUIPMENT AND TECHNIQUES" and "SPRAY DRIFT MANAGEMENT" sections of the label booklet for essential product information prior to making aerial application.

See "CROPS" section of the label booklet for specific recommendations on the use of this product.

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS (EXCEPT AS SPECIFIED FOR INDIVIDUAL ROUNDUP READY® CROPS), DESIRABLE PLANTS AND TREES BECAUSE SEVERE INJURY IS LIKELY TO RESULT.

FOR FRESNO COUNTY, CA ONLY
From February 15 through March 31 only

For aerial application outside these dates, refer to the above section of this label.

This supplement only applies to the area contained inside the following boundaries within Fresno County, California only.

- North: Fresno County line
- South: Fresno County line
- East: State Highway 99
- West: Fresno County line

General Information

Always read and follow the label directions and precautionary statements for all product used in the aerial application.

Observe the following directions to minimize off-site movement during aerial application of KULL 50 S. Minimization of off-site movement is the responsibility of the grower, Pest Control Advisor, and aerial applicator.

Written Recommendations

A written recommendation MUST be submitted by or on behalf of the applicator to the Fresno County Agricultural Commissioner 24 hours prior to application. This written recommendation MUST state the proximity of surrounding crops, and that conditions of each manufacturer's applicable product label(s) and this label have been satisfied.

Aerial application of KULL 50 S is limited to pilots who have successfully completed a Fresno County Agricultural Commissioner and California Department of Pesticide Regulation approved training program for aerial application of herbicides. All aircraft must be inspected, critiqued in flight, and certified at a Fresno County Agricultural Commissioner approved fly-in. Test and calibrate spray equipment at intervals sufficient to insure that proper rates of herbicides and adjuvants are being applied during commercial use. Applicator must document such calibrations and testing. Demonstration of performance at Fresno County Agricultural Commissioner approved "fly-in" constitutes such documentation, or other written records showing calculations and measurements of flight and spray parameters acceptable to the Fresno County Agricultural Commissioner.

Application at night - Do not apply this product by air earlier than 30 minutes prior to sunrise and/or later than 30 minutes after sunset with prior permission from the Fresno County Agricultural Commissioner.

Read the "LIMIT OF WARRANTY AND LIABILITY" in the label for KULL 50 S before using this product. Those terms apply to this supplemental labeling and if those terms are not acceptable, return the product unopened at once.

Ritter Chemical
P.O. Box 430974
Houston, TX 77243

Aerial Applicator Training and Equipment

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

**SUPPLEMENTAL LABELING
FOR AERIAL APPLICATIONS IN MISSISSIPPI**

JUN 23 2005

[Alternate Brand Name: KULL 50]

**KULL 50 S
EPA Reg. No. 9468-XX**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
9468-32**

**READ AND FOLLOW THE ENTIRE LABEL FOR KULL 50 S BEFORE PROCEEDING
WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING**

"Label" refers to the container label and booklet for KULL 50 S and this supplemental.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. This labeling must be in the possession of the user at the time of pesticide application.

Aerial Application Restrictions:

Aerial application is prohibited in Zone I, south of Highway 8 in the counties listed below, from March 15 through April 30, except by permit from an authorized employee of the Mississippi Department of Agriculture and Commerce, Bureau of Plant Industry (Ph. 1-888-257-1285).

Aerial application is prohibited in Zone II, north of Highway 8 in the counties listed below, from March 25 through April 30, except by permit from an authorized employee of the Mississippi Department of Agriculture and Commerce, Bureau of Plant Industry (Ph. 1-888-257-1285).

The Bureau of Plant Industry may at anytime, based on current planting and environmental conditions modify the above restrictions for either zone or county therein

Zone I: South of Highway 8 in the counties of Bolivar, Sunflower, Leflore, and Grenada plus the entire counties of Carroll, Holmes, Humphreys, Washington, Sharkey, Issaquena, Yazoo and Warren.

Zone II: North of Highway 8 in the counties of Bolivar, Sunflower, Leflore, and Grenada plus the entire counties of Tallahatchie, Tate, Quitman, Coahoma, Tunica, Panola and Desoto

**Ritter Chemical
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