

9468-33

6/23/2005

Page 1 of 3



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 41S (Supplementals for Aerial Application in Fresno County, CA and MS
EPA Registration No. 9468-33
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,

James A. Tompkins
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505C)



WASHINGTON

1101 17th Street, N.W.
Suite 500
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Mr. James A. Tompkins
Product Manager 25
Herbicide Branch
Office of Pesticide Programs, EPA
1801 South Bell Street (Room 266A)
Arlington, VA 22202

August 3, 2005

RE: Ritter Chemical; KULL 41 S (EPA Reg. No. 9468-33)

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

Label Notification to incorporate the supplemental labeling with the product's labeling booklet per the EPA letter dated June 23, 2005

Dear Mr. Tompkins:

Technology Sciences Group, on behalf of Ritter Chemical is submitting the enclosed label notification for the above referenced product to incorporate the Fresno County, California and the state of Mississippi supplemental labeling into one master label. No other changes have been made to the labeling and the required certification statement is on the application form (EPA 8570-1).

CANADA

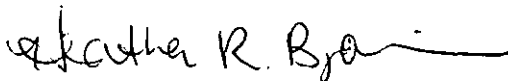
275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754

You will find the following in support of this submission:

- 1) Application Form,
- 2) One redline copy of the revised booklet label (highlighting all changes),
- 3) Five clean copies of the revised booklet labeling, and
- 4) A copy of the EPA letter dated June 23, 2005 for easy reference.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,



Heather R. Bjornson
Regulatory Agent for Ritter Chemical

cc: Brad Jones, Ritter Chemical

3 8 3

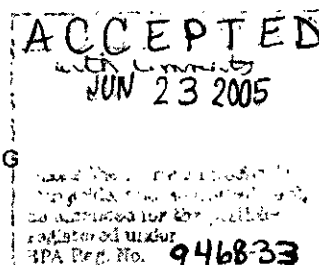
SUPPLEMENTAL LABELING

FOR AERIAL APPLICATION IN FRESNO COUNTY, CALIFORNIA ONLY

For Aerial Application outside Fresno County, CA, refer to
KULL 41S Container label and booklet.

[Alternate Brand Name: KULL 41]

KULL 41S
EPA Reg. No. 9468-33



READ AND FOLLOW THE ENTIRE LABEL FOR KULL 41S BEFORE PROCEEDING
WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING

"Label" refers to the container label and booklet for KULL 41S 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 41S. 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 Applicator Training and Equipment

Aerial application of KULL 41S 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 41S 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

