

4/27/2010



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 27 2010

Ms. Heather R. Bjornson
Ritter Chemical LLC
P.O. Box 430974
Houston, TX 77243

Ms. Bjornson:

RE: ADMINISTRATIVE LETTER OF MAY12, 2009; KULL 41 S; EPA REG. NO. 9468-33;
ISOPROPYLAMINE SALT OF GLYPHOSATE

Your supplemental label increasing the rate of the isopropylamine salt of glyphosate in the product KULL 41 S, EPA Reg. No. 9468-33, on dry peas, lentils, chickpeas, and dry beans is approved provided the following supplemental label changes are made:

1. On page 2, under both "BROADCAST SPRAY PRECAUTIONS AND RESTRICTIONS" and "SPOT TREATMENT PRECAUTIONS AND RESTRICTIONS", change the last bullets to read "Do not treat cowpeas or field (feed) peas, since these"

Provide one copy of the revised corrected supplemental label before distribution and use.

Please contact Phil Errico at 703-305-6663/ errico.philip@epa.gov for further assistance with this matter.

Regards,

A handwritten signature in black ink, appearing to read "James Tompkins", written over a large, stylized circular flourish.

James A. Tompkins, PM-25
Herbicide Branch/Registration Division 7505P

ACCEPTED
with COMMENTS
In EPA Letter Dated
APR 27 2010

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
9468-33

SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR KULL 41 S HERBICIDE BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABEL.

When using KULL 41 S herbicide as permitted according to this supplemental labeling, read and follow all applicable directions, restrictions, and precautions on the label booklet provided with the pesticide container and on this supplemental labeling. This supplemental labeling must be in the possession of the user at the time of pesticide application.

KULL 41 S

EPA Reg. No. 9468-33

PREHARVEST AND SPOT-TREATMENTS OF WEEDS IN DRY BEANS, PEAS, LENTILS AND CHICKPEAS

KEEP OUT OF REACH OF CHILDREN

CAUTION

In case of an emergency involving this product, call CHEMTREC toll free at 1-800-424-9300.

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 application.

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 OR DESTRUCTION MAY RESULT.

See "General INFORMATION" and "MIXING" sections of the label booklet for KULL 41 S herbicide for essential product performance information.

BROADCAST SPRAY:

This product may be applied as an over the top broadcast spray to control labeled weeds prior to the harvest of dry peas, lentils, and chickpeas. Apply up to 32 fluid ounces of this product per acre in dry beans, or up to 96 fluid ounces per acre in dry peas, lentils, and chickpeas in 3 to 20 gallons of water per acre at the hard dough stage of legume seed (30 percent grain moisture or less). Either ground broadcast or aerial applications may be made.

BROADCAST SPRAY PRECAUTIONS AND RESTRICTIONS

- Apply at least 7 days before harvest for dry beans and 14 days before harvest for dry peas, lentils, and chickpeas.
- Only one application per year may be made; do not combine a preharvest spray with a spot treatment on the same crop area.
- Employ at least a 30 day plant-back interval between treatment and replanting for any crop not listed in the KULL 41 S herbicide label.
- Preharvest application is not recommended for dry beans, peas, lentils, or chickpeas grown for seed, as a reduction in germination or vigor may occur.
- Do not feed treated vines and hay from these crops to livestock. Do not apply this product through any type of irrigation system.
- Do not treat field (feed) peas, since these are considered to be grown as livestock feed.

SPOT TREATMENTS

This product may be applied as spot treatment to control troublesome weeds such as Canada thistle, quackgrass, mayweed (dog fennel), and milkweed in dry peas, lentils, and chickpeas. Apply up to 32 fluid ounces of this product per acre in dry beans, or up to 96 fluid ounces per acre in dry peas, lentils, and chickpeas, in 10 to 20 gallons of water through ground spray equipment or use a 2 percent solution in a hand held sprayer. For best results, applications should be made at or beyond the bud stage of growth. The crop receiving spray in treated areas will be killed.

SPOT TREATMENT PRECAUTIONS AND RESTRICTIONS:

- Apply at least 14 days before harvest.
- Only one application per year may be made; do not combine a preharvest spray with a spot treatment on the same crop area.
- Employ at least a 30 day plant-back interval between treatment and replanting for any crop not listed in the KULL 41 S herbicide label.
- Do not feed treated vines and hay from these crops to livestock. Do not apply this product through any type of irrigation system.
- Do not treat field (feed) peas, since these are considered to be grown as livestock feed.

Read the "LIMIT OF WARRANTY OR LIABILITY" in the label booklet for KULL 41 S herbicide before using. For over-the-top uses on Roundup Ready crop varieties, crop safety and weed control performance are not warranted by Ritter Chemical LLC when this product is used in conjunction with "brown bag" or "bin run" seed saved from previous year's production and replanted. These terms apply to this supplemental labeling and if these terms are not acceptable, return the product unopened at once.

Manufactured for:
Ritter Chemical LLC
PO Box 430974
Houston, TX 77243