

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460OFFICE OF
PESTICIDE PROGRAMS

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC
c/o Technology Sciences Group, Inc.
1150 18th St., N.W., Suite 1000
Washington, DC 20036

APR 23 2010

SUBJECT: Application for Pesticide Notification – Revised the Basic Confidential Statement of Formula (CSF) to Add Additional Producer; and Minor Label Change to Add an Additional EPA Est. No.
KULL 62 MUP
EPA Reg. No. 9468-34
Application Dated December 18, 2008 and Basic CSF Dated December 17, 2008

Dear Ms. Bjornson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The Basic CSF dated December 17, 2008 and the label, submitted with the application dated December 18, 2008, are considered “acceptable”, date stamped “Notification”, and will be placed in our records.

- **PLEASE NOTE:** The Basic CSF dated December 17, 2008 supersedes all previously accepted CSFs.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 9468-34	2. EPA Product Manager Jim Thompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) KULL 62 MUP	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical LLC P.O. Box 430974 Houston, TX 77243 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION
 APR 23 2010

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This notification is revise the CSF and to make minor text revisions to the product label and is not subject to PRIA. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling of the Confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
1. 2.5, 30, 275, 4,500 or 18,000 gals

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Heather R. Bjornson, Technology Sciences Group, Inc.	Title Regulatory Agent	Telephone No. (Include Area Code) (202) 828-8945
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Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.

2. Signature

3. Title
Regulatory Agent to Ritter Chemical LLC

4. Typed Name
Heather R. Bjornson

5. Date
December 18, 2008

6. Date Application Received (Stamped)

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D404400

9468-34 3
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WASHINGTON

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Jim Tompkins
Herbicide Branch
Registration Division (7504P)
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

December 18, 2008

CSF
Label

RE: Ritter Chemical LLC: KULL 62 MUP (EPA Reg. No. 9468-34)

Notification to update the CSF and label

SACRAMENTO

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

Dear Mr. Tompkins:

Technology Sciences Group, on behalf of Ritter Chemical LLC, is submitting the enclosed notification to: add and additional producer of KULL 62 MUP to the CSF and the label.

You will find the following in support of this notification:

- 1) EPA Application Form,
- 2) Two copies of the revised CSF (dated December 18, 2008),
- 3) One copy of the CSF already on file, and
- 4) One redline version of the label with the EPA Est. No. added.

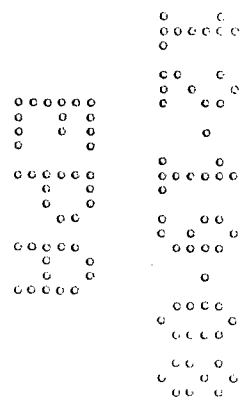
Please do not hesitate to contact me with any questions at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

CANADA

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

Sincerely,

Heather R. Bjornson
Regulatory Agent for Ritter Chemical LLC



Text Label without graphics, pictures and illustrations

[Alternate Brand Name: Alecto 62 MUP]

KULL 62 MUP

Active Ingredient:

Glyphosate, isopropylamine salt..... 62.0%

Other Ingredients:38.0%

Total:..... 100.0%

NOTIFICATION

APR 23 2010

CAUTION

Keep Out of Reach of Children

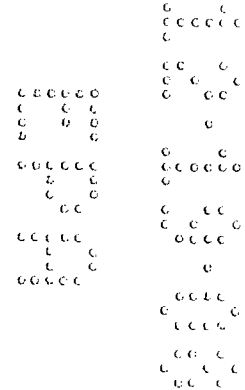
Read entire label before using this product.

EPA Reg. No.: 9468-34

EPA Est. No.: 47258-TX-01; 72949-CHN-001; 75464-CHN-001; 81347-CHN-001; 9468-OR-001; 9468-TX-001; 9468-TX-002; 82784-GTM-001; 75460-CHN-001; ; 81346-CHN-001; ; 81889-CHN-001; 74339-PHL-001

Net Contents: XX

Manufactured for:
Ritter Chemical
P.O. Box 430974
Houston, TX 77243



FIRST AID	
If swallowed	<ul style="list-style-type: none"> • 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 by a poison control center or doctor. • Do not give anything to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 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 inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 -20 minutes. • Call a poison control center or doctor for treatment.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. This product is identified as KULL 62 MUP, EPA Reg. No. 9468 -34. You may also contact the Poison Control Center at (800) 764-7661 for emergency treatment information.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION

Harmful if swallowed, absorbed by skin, or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing or breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Solutions of this product should be mixed and using only stainless steel, aluminum, fiberglass, plastic and plastic-lined containers.

DO NOT MIX, STORE OR UTILIZE THIS PRODUCT OR SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR TANKS. This product or solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

DIRECTIONS FOR USE

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

Use only for manufacturing, formulating, or repacking into a herbicide for use in aquatic, industrial, turf, ornamental nursery, tree and forestry, and residential sites; or some or all of the following food cropping systems: root, bulb, and tuber vegetables, leafy vegetables, brassica and cucurbit vegetables, succulent and dried legume vegetables, fruiting vegetables, fruits (citrus, pome, stone, various tropical fruits, small fruits and berries), tree nuts, cereal grains, animal grasses and forages, herbs, spices, and food crops including asparagus, avocado, banana, canola, coffee, cotton, coconut, cranberry, dates, flax, grapes, kiwi, lychee, mints, olive, palms, peanut, pineapple, soybeans, strawberry, sugar beet, sugarcane, and tea.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store this product above 32° F (0° C) to keep from crystallizing. Crystals will settle to the bottom. If allowed to crystallize, warm to 68° F (20° C) and mix well or recirculate to redissolve before using.

Pesticide Disposal: Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with the applicable Federal, state or local procedures.

Empty Container Disposal: An empty container retains product residue. Observe all labeled safeguards until label is cleaned, reconditioned or destroyed. Completely empty tank into formulation equipment.

LIMIT OF WARRANTY AND LIABILITY

Ritter Chemical does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from Ritter Chemical. Manufacturers of end-use products formulated with KULL 62 MUP are responsible for obtaining U.S EPA Registration before marketing any pesticide product.

