

9468-34

5/18/2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Ross Gilbert
Agent
Ritter Chemical, LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136yh Street NW
Gig Harbor, WA 98332

MAY 18 2010

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4
Email Copy on May 12, 2010

Dear Mr. Ross:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated April 7, 2010 for:

EPA Registration 9468-34 Kull 62 MUP

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identify the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-85479.

Sincerely,

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



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 J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter Chemical, LLC / Kull 62 MUP	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Ritter Chemical, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <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 _____	NOTIFICATION MAY 18 2010
<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.	

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

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 55 gal., 250 gal., 275 gal., bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Gilbert	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ross Gilbert	5. Date 4/7/10	

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

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April 7, 2010

COURIER DELIVERY

Jim Tompkins (PM 25)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ritter Chemical, LLC – Kull 62 MUP (EPA Reg. No. 9468-34)
Revision to Container Disposal Instructions per PRN 2007-4

Dear Mr. Tompkins,

On behalf of Ritter Chemical, LLC please find the enclosed label notification revising the container disposal instructions for Kull 62 MUP per PRN 2007-4.

In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Kull 62 MUP labeling with changes tracked
3. One (1) copy of the Kull 62 MUP labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of the Kull 62 MUP labeling on CD
6. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

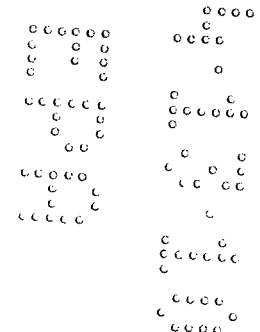
Sincerely,



Ross Gilbert

Enclosures

cc: Jaime Smith; Ritter Chemical, LLC



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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

MAY 18 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;

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 as 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:

[FOR NON-REFILLABLE CONTAINERS GREATER THAN 5 GALLONS:]

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or 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.

[FOR REFILLABLE CONTAINERS GREATER THAN 5 GALLONS:]

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or

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pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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.

EPA 20100407