



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 19, 2019

Maryanne Geisbush
Regulatory Consultant
Adama Agan Ltd.
c/o Pyxis Regulatory Consulting Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Subject: Label Amendment – Amendment to add use sites from me too product
Product Name: Clethodim 37% MUP
EPA Registration Number: 11603-34
Application Date: 08/24/2018
Decision Number: 543959

Dear Ms. Geisbush:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

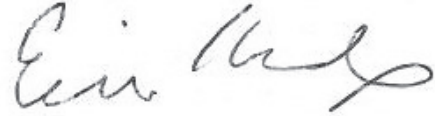
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Manjula Unnikrishnan by phone at 703-347-8520, or via email at unnikrishnan.manjula@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Kraft". The signature is fluid and cursive, with the first name "Erik" being more legible than the last name "Kraft".

Erik Kraft, Product Manager 24
Fungicide and Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

CLETHODIM 37% MUP

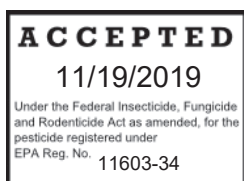
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:	% BY WT.
Clethodim: (E)-2-[1-[[3-chloro-2-propenyl]oxy]imino]propyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one	37.2%
OTHER INGREDIENTS:	62.8%
TOTAL	100.0%

Contains petroleum distillate.

KEEP OUT OF REACH OF CHILDREN CAUTION/PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail).



Manufactured for:
ADAMA Agan Ltd.
c/o Makhteshim Agan of North America, Inc. (d/b/a ADAMA)
3120 Highwoods Blvd. #100
Raleigh, NC 27604

EPA Reg. No. 11603-34

EPA Est. No. XXXXXXXXXX

NET CONTENTS: _____ GALS

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none">• Immediately call a poison control center or doctor.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give any liquid to the person.• Do not give anything by mouth 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 ON SKIN OR CLOTHING:	<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 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 mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-250-9291 for emergency medical treatment information. NOTE TO PHYSICIAN: Ingestion of this product or subsequent vomiting can result in aspiration of light hydrocarbon liquid, which can cause pneumonitis. If ingested, probable mucosal damage may contraindicate the use of gastric lavage.	

In case of spills, fire leaks or accident call 1-800-535-5053.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

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

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 Pollutant Discharge Elimination System (NPDES) permit

and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

No end use for this product other than manufacturing is intended or implied in the **DIRECTIONS FOR USE** and **LIMITATION OF WARRANTY AND LIABILITY STATEMENT**.

Only for formulation into herbicide products intended for the following use(s):

Terrestrial, Food Uses On: Root Vegetables (except Sugar Beet), Subgroup 1B; Tuberous and Corm Vegetables, Subgroup 1C; Onion, Bulb, Subgroup 3-07A; Onion, Green, Subgroup 3-07B; Leafy Greens, Subgroup 4-16A; Brassica Leafy Greens, Subgroup 4-16B; Brassica Head and Stem Vegetable, Group 5-16; Legume Vegetables, except Soybean, Group 6; Fruiting Vegetable except Okra, Group 8-10; Melon, Subgroup 9A; Squash/Cucumber, Subgroup 9B; Pome Fruit, Group 11-10; Stone Fruit, Group 12-12; Caneberry, Subgroup 13-07A; Bushberry, Subgroup 13-07B; Low Growing Berry except Cranberry, Subgroup 13-07G; Tree Nut, Group 14-12; Herbs, Subgroup 19A; Rapeseed, except Flax Seed, Subgroup 20A; Sunflower, Subgroup 20B; Cotton Seed, Subgroup 20C; Stalk and Stem Vegetable, Subgroup 22A; Leaf Petiole Vegetable, Subgroup 22B. **Terrestrial, Individual Food Uses On:** Alfalfa; Artichoke (Globe); Clover; Cotton; Cranberry; Field Corn; Flax Seed; Hops; Peppermint tops; Spearmint tops; Okra; Peanut; Radish Tops; Soybean; Stevia, dried leaves; Sugar Beet; Sugar Beet Tops. **Terrestrial, Non-Food Uses On: Greenhouses; Shadehouses; Lathhouses; Golf courses; Nurseries; Residential Outdoor; Non-Food Uses; Native prairie warm season grass restoration projects; Niger seed (*guizotia abyssinica*) grown for use as wild bird feed; Ornamentals; Non-bearing Food Crops** (including but not limited to apple, berries, cherry (sweet), citrus fruits, grapes, olives, peaches, pears, prunes, stone fruits, strawberries, tree nuts (including but not limited to: almond, filbert, pecan, pistachio, walnut); **Conifer trees; Christmas Trees; Domestic Outdoor; Fallow land (and other non-producing agricultural areas); and Non-crop or Non-planted areas.**

Uses for which US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and

Uses for experimental purposes that are in compliance with US EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal or cleaning of equipment. Open dumping is prohibited.

PESTICIDE STORAGE: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Store in cool, dry place. Do not store diluted spray.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:

Nonrefillable Container (five gallons or less): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available, or offer for reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (greater than five gallons): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container 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. Offer for recycling if available, or offer for reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Container (greater than 55 gallons): Refillable container. Refill this container with clethodim 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 pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ADAMA Agan Ltd. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, ADAMA Agan Ltd. makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of ADAMA Agan Ltd. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, ADAMA Agan Ltd. disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at ADAMA Agan Ltd.'s election, the replacement of product.

EPA Reg. No. 11603-34: Amend 08-24-2018