07/10/2008



530-11

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JUL 10 2008

Mr. Marshall B. Wixson Helm Agro US, Inc 8295 Tournament Drive, Suite 310 Memphis, TN 38125

Dear Mr. Wixson:

Subject: Glyphosate 97% TGAI (Update Use Sites) EPA Registration No. 74530-11 Application Dated April 15, 2008

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.

--Update your "Conditions of Sale and Warranty" as per the enclosed guidance entitled "Guidance on Warranty Statements", also available on the Agency's website.—

Submit one (1) copy of your final printed labeling incorporating the above change before you release the product for shipment. Amended labeling supersedes all previously approved ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

Unikie Kulalban jrs James A. Tompkins Product Manager 25 Herbicide Branch Registration Division (7505P)

GLYPHOSATE 97% TGAI

Herbicide for Formulating Use

Undor the Federal Insecticide, Fingicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. >4530-//

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ACCEPTED with COMMENTS In EPA Letter Dated:

Active Ingredient
Glyphosate: N-(phosphonomethyl) glycine
Inert Ingredients:
TOTAL

EPA Reg. No. 74530-11

EPA Est. No. 083807-CHN-001

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID	
If in eyes:	 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. Call a poison control center or doctor for treatment advice.
If inhaled:	 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 treatment advice.
If on skin:	 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 swallowed:	 Call a poison control center or doctor immediately for treatment advice. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Do not induce vomiting unless told to do so by a poison control center or doctor.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

For Chemical Emergency (spill, leak, fire, or exposure) Call CHEMTREC: 1-800-424-9300.

Helm Agro US, Inc. 8295 Tournament Drive Memphis, Tennessee 38125

Net Contents: 25 KG

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

CORROSIVE. Causes irreversible eye damage. Harmful if inhaled. Do not get in eyes or on clothing. Avoid breathing dust. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash 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 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.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Formulators using this product are responsible for obtaining EPA registration of their formulated products.

This pesticide may only be formulated or repackaged into a herbicide for use in aquatic, industrial turf, and ornamental sites, tree and forestry, residential sites or some or all of the following 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

Prohibitions: Do not contaminate water, food or feed by storage or disposal. Do not store under conditions which might adversely affect the container or its ability to function properly. Such conditions include, but are not limited to, positioning of the container in storage, storage temperature, potential for crushing or damage due to stacking, and penetration of moisture.

Pesticide Storage: Store in a safe manner. Store in original container only. Store in a cool, dry place. Reduce stacking height where local conditions such as humidity or pallet overhang can affect package strength.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND WARRANTY

HELM AND SELLER OFFER THIS PRODUCT AND THE BUYER AND USER ACCEPT THIS PRODUCT UNDER THE FOLLOWING AGREED CONDITIONS OF SALE AND WARRANTY.

HELM warrants only that this product conforms to the chemical description on the label and is believed to be reasonably fit for the purposes referred to in the Directions for Use when used as directed under normal conditions. HELM MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTÄBILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. In no case shall HELM or the Seller be diable for consequential, special, or indirect damages resulting from the use or handling of this product. Any variation or exception from this warranty must be in writing and signed by an authorized HELM representative.

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