



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 7 2008

ROTAM LTD.
% Frank Sobotka
IPM Resources LLC
660 Newtown-Yardley Road, Suite 105
Newtown, PA 18940

Subject: Rotam Tebuconazole Technical
EPA Reg. No. 81598-2
Your amendment dated July 9, 2008
EPA Decision Number 397194

Dear Dr. Sobotka:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. In the section **DIRECTIONS FOR USE - Terrestrial Food Crops:**
 - a. Add a space between "Barley" and the following parenthesis
 - b. Add the following after "Oats": (seed treatment and foliar application)
 - c. Add a left parenthesis between "Wheat" and "seed"
2. In the section **STORAGE AND DISPOSAL - PESTICIDE STORAGE** change "correct" to "collect"

As a condition of registration, you must submit or cite data to satisfy the following data gaps in the timeframe specified below:

1. Submit barley field trial data from regions 10 and 11 (along with concurrent storage stability data on barley straw). Submission Due by: December 2011
2. Comply in the timeframe specified with the future Agency Data Call-in for all triazole-derivative active ingredients.
3. Submit a Whole Sediment Toxicity Study for benthic invertebrates. Submission due by: December 2011.
4. Submit Aerobic and Anaerobic Aquatic Metabolism Studies. Submission due by: December 2011.

One copy of the label stamped "Accepted with comments" is enclosed for your records. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7505P)

Enclosure

Rotam Tebuconazole Technical

For Formulation Use Only

ACTIVE INGREDIENT:

TEBUCONAZOLE*.....	98.0%
Other	
Ingredients.....	2.0%
Total.....	100.0%

* (CASRN: 107534-96-3)

EPA Reg. No. 81598 – 2

EPA Est. No.: 069821-CHN-005

ACCEPTED
with COMMENTS
In EPA Letter Dated

AUG 7 2008

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

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID	
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 further 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 further 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 poison control center or doctor for treatment advice.
If Swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor for treatment advice. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Have person sip a glass of water if able to swallow. • Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN: No specific antidote. Treat symptomatically.	
For MEDICAL EMERGENCIES call your local Poison Control Center, or contact a Doctor for assistance. Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

81598-2

SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON LABEL.

Manufactured by:
Rotam LTD
7/F., Cheung Tat Centre
18 Cheung Lee Street
Chai Wan, Hong Kong

NET CONTENTS: 100 lbs (45.35 kg)
GROSS WEIGHT: 110 lbs (49.89 kg)

Rotam Tebuconazole Technical

**PRECAUTIONARY STATEMENTS
Hazardous to Humans and Domestic Animals**

CAUTION. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

Environmental Hazards

This pesticide is toxic to estuarine and marine invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirement of a National Pollutant Discharge Elimination System (NPDES) permit and permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing the product to sewer system without previously notifying the local sewage treatment plant authority. For guidance contact your local 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.

INSTRUCTIONS TO FORMULATORS:

This technical product may be used for the manufacture of fungicidal products for the following uses:

Terrestrial Food Crops:

Bananas, Barley(seed treatment and foliar application), Cherries, Grapes, Grasses grown for seed, Nectarines, Oats, Peaches, Peanuts and Wheat seed treatment and foliar application).

Terrestrial Non-Food Crops:

Roses, Flowers, Ornamental trees, Ornamental shrubs, Groundcovers, and Vines.

Terrestrial Non-Food (Domestic Outdoor):

For the preservation of wood-based composite products, wood products intended for above ground and in-ground contact, plastics, coatings for in-film preservation including paper coatings for indoor, non-food contact uses, glues and adhesives, and metal working fluids against biodeterioration.

Formulators using this product are responsible for obtaining Environmental Protection Agency Registration for their formulated products.

Rotam Tebuconazole Technical

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store Rotam Tebuconazole Technical in a cool, dry secure place away from food, drink, and feeding. If spilled, do not flush to waterways (see Environmental Hazards). Carefully correct and contain spilled material in a manner that produces the least amount of airborne dust.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

Plastic Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, if allowed by State and local authorities. Then offer for recycling or reconditioning, or puncture and dispose of container in a sanitary landfill, or by incineration if allowed by State and local authorities. If burned, stay out of smoke.

Metal Containers: 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.

EMERGENCY RESPONSE

For 24 - hour emergency information regarding spills, leaks, exposure, or accidents, call CHEMTREC: 1-800-424-9300

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Rotam Tebuconazole Technical

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions for Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

ROTAM LTD warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use. This warranty does not extend to the use of the product contrary to proper instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or ROTAM LTD, and Buyer and User assume the risk of any such use. **ROTAM LTD. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR NEITHER A PARTICULAR PURPOSE NOR ANY OTHER EXPENSES OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent allowed by State law, ROTAM LTD or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM LTD AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM LTD OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

ROTAM LTD and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sales and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of ROTAM LTD.

EPA Registered: July 10, 2006
Amended: [Date TBA]