



01/24/2011

1 of 5

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Frank Sobotka  
IPM Resources LLC  
4032 Crockers Lake Blvd.  
Suite 818  
Sarasota, FL 34238

~~FIFRA~~  
1-24-11 E.K.

Subject: Label Amendment  
EPA Reg. No.: 81598-7 / Rotam Thifensulfuron-Methyl Technical

Dear Mr. Sobotka:

The amended 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 changes:

1. Change the Hazards to Humans and Domestic Animals to "Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco." (see attached toxicology review)

You must submit a copy of the final printed label. A stamped copy of the label is enclosed for your records. This label supersedes all previously accepted labels. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA. Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov.

Sincerely,

Meredith Laws  
Acting Herbicide Branch Chief  
Registration Division

2015

# Rotam Thifensulfuron-methyl Technical

## For Formulation Use Only

### ACTIVE INGREDIENT:

Thifensulfuron-methyl*	97.0%
Other Ingredients	3.0%
<b>Total</b>	<b>100.0%</b>

\* (CASRN: 79277-27-3)

EPA Reg. No. 81598 - 7

EPA Est. No.: 069821-CHN-001

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If In Eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
If On Skin Or Clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
If Inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call poison control center or doctor for treatment advice.</li> </ul>
If Swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
No specific antidote. Treat symptomatically.	
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
<b>FOR MEDICAL EMERGENCIES CALL YOUR LOCAL POISON CONTROL CENTER FOR ASSISTANCE.</b>	

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

NET-CONTENTS: 25-Kg (55.1 lbs)  
 GROSS WEIGHT: 28 Kg (61.7 lbs)

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**

1-24-11  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.

81598-7

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

**CAUTION.** Causes moderate eye irritation. Harmful if absorbed through skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust. 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 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 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 herbicidal products for the following uses:

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

To be used only for the formulation of end-use herbicide products registered for the following uses:

**TERRESTRIAL FOOD CROP:** Wheat, barley, oats, soybeans, field corn, cotton, canola including: SU Gene Tolerant Canola (ST Canola and SU Canola<sup>TM</sup>)\*, flax, safflower.

**TERRESTRIAL FEED CROPS OR NON-FOOD USES:** Follow.

Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.

Uses for experimental purposes that are in compliance with USEPA requirements.

**Rotam Thifensulfuron-methyl Technical**

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store Rotam Thifensulfuron-methyl Technical in the original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage.

**PESTICIDE DISPOSAL:** Do not contaminate water, food or feed by disposal. Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Refer to the Net Contents section of this product's labeling for the applicable "nonrefillable Container" or "Refillable Container" designation.

**Nonrefillable Plastic Containers (Capacity Equal to or Less than 50 Pounds):** 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 ¼ 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 or more times. Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

**Nonrefillable Paper or Plastic Bags, Fiber Sacks including Flexible Intermediate Bulk Containers (FIBC) or Fiber Drums with Liners.** Nonrefillable container. Do not reuse or refill this container. Completely empty paper or plastic bag, fiber sack or drum liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application or manufacturing equipment. Then offer for recycling if available or dispose of empty paper or plastic bag, fiber sack or fiber drum and liner in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

**Refillable Fiber Drums With Liners:** Refillable container (fiber drum only). **Refilling Fiber Drum:** Refill this fiber drum with Rotam Thifensulfuron-methyl Technical containing thifensulfuron-methyl only. Do not reuse this fiber drum for any other purpose. Cleaning before refilling is the responsibility of the refiller. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application or manufacturing equipment. **Disposing of Fiber Drum and/or Liner:** Do not reuse this fiber drum for any other purpose other than refilling Rotam Thifensulfuron-methyl Technical. Cleaning the container (liner and/or fiber drum) before final disposal is the responsibility of the person disposing of the container. Offer the liner for recycling if available or dispose of liner in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner. To clean the fiber drum before final disposal, completely empty the fiber drum by shaking and tapping sides and bottom to loosen clinging particles. Empty residual into application or manufacturing equipment. Then offer the fiber drum for recycling if available or dispose of in a sanitary landfill, or by incineration. Do not burn, unless allowed by state and local ordinances.

**EMERGENCY RESPONSE**

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

**Rotam Thifensulfuron Technical**

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**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.

The Directions for Use of this product should be followed carefully. It is possible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of ROTAM LTD, or Seller. To the extent consistent with applicable law, the Buyer and User shall assume all such risks, and Buyer and User agree to hold ROTAM LTD and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, 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, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. 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. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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 consistent with applicable 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. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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.

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Amended: