



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 14, 2019

Mr. Ogongi
Agent
Rotam Limited
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: Notification per PRN 98-10 – Revise warrant statement, add reference statements and other minor revisions
Product Name: Rotam Thifensulfuron-Methyl Technical
EPA Registration Number: 81598-7
Application Date: October 15, 2019
Decision Number: 557019

Dear Mr. Ogongi:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

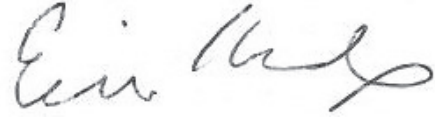
The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

If you have any questions, you may contact please contact BeWanda Alexander at (703)347-0313 or by email at alexander.bewanda@epa.gov.

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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 prominent than the last name "Kraft".

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

Enclosure

[MASTER LABEL]

Rotam Thifensulfuron-methyl Technical

For Formulation Use Only**ACTIVE INGREDIENT:**

Thifensulfuron-methyl*.....97.84%

Other Ingredient.....2.16%**Total**..... 100.00%

*(CASRN: 79277-27-3)

EPA Reg. No.: 81598-7

EPA Est. 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	
HOTLINE NUMBERS	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For 24-Hour Medical Emergency Assistance (Human or Animal), call: 1-800-222-1222. For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), call CHEMTREC: 1-800-424-9300.	

[SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON LABEL.](#)**Manufactured [By] [For]:**

Rotam Limited

[Unit 6, 267/F., Cheung Tat Trend Centre](#)[18-29 Cheung Lee Street](#)

Chai Wan, Hong Kong

NET CONTENTS: 25 Kg (55.1 lbs.)**GROSS****Weight: 28 Kg (61.7 lbs.)****Net Contents:** _____**NOTIFICATION**

81598-7

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/14/2019

PRECAUTIONARY STATEMENTS

HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. 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.

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:

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: Barley, Cotton, Canola including: SU Gene Tolerant Canola (ST Canola and SU Canola™), Field Corn, Flax, Oats, Safflower, Soybeans, Wheat.

TERRESTRIAL FOOD CROP: Fallow.

Uses for which US EPA 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 U.S. EPA requirements.

STORAGE AND DISPOSAL

85198-7.20191015.V1

[Text in brackets is optional text or a note to EPA reviewer]

Rotam Thifensulfuron-methyl Technical
Notification Revising S&D and various minor edits.
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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 products labeling for the applicable "Nonrefillable Container" or "Refillable Container" designation.~~

~~**[Non-refillable Plastic Containers (Capacity Equal to or Less than 50 Pounds):** 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, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]~~

~~**[Non-refillable Plastic Containers (Capacity Equal to or more than 50 Pounds):** Do not reuse or refill this container. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank. Hold container upside down over application equipment or a mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then 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.]~~

~~**[Non-refillable Paper or Plastic Bags, Fiber Sacks including Flexible Intermediate Bulk Containers (FIBC) or Fiber Drums with Liners.** 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, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke. 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. Offer for recycling, or puncture and dispose of in a sanitary landfill, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.]~~~~**[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, 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 use 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 by its liner. To clean the fiber drum before final disposal, completely empty the fiber drum by shaking and tapping the 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

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 must be followed carefully. It is impossible 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 LIMITED, or Seller. The Buyer and User shall assume all such risks, and Buyer and User agree to hold ROTAM LIMITED and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, ROTAM LIMITED 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 LIMITED, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ROTAM LIMITED MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR NEITHER A PARTICULAR PURPOSE NOR ANY OTHER EXPENSES OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

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