

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 19, 2015

Cheryl Wagner Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Subject: Label Amendment – Methomyl Mitigation. Delete Uses on Barley, Oats and Rye.

Product Name: Rotam Methomyl Technical

EPA Registration Number: 81598-9 Application Date: January 16, 2015

Decision Number: 499730

Dear Ms. Wagner:

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.

Page 2 of 2 EPA Reg. No. 81598-9 Decision No. 499730

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 Carlyn Petrella by phone at 703-347-0439, or via email at petrella.carlyn@epa.gov.

Sincerely,

Richard Gebken Product Manager 10

Invertebrate & Vertebrate Branch 2

Office of Pesticide Programs

Enclosure

Rotam Methomyl Technical

For Formulation Use Only

ACTIVE INGREDIENT:

Methomyl*

*(CASRN: 16752-77-5)

KEEP OUT OF REACH OF CHILDREN

DANGER POISON

FIRST AID	
(N-Methyl Carbamate insecticide)	
IF INHALED:	Move person to fresh air.
	If person is not breathing, call 911 or an ambulance, then give artificial respiration,
	preferably by mouth-to-mouth, if possible.
	Call a poison control center or doctor for further treatment advice.
IF SWALLOWED:	Call a poison control center or doctor immediately for treatment advice.
	Have person sip a glass of water if able to swallow.
	Do not induce vomiting unless told to by a poison control center or doctor.
	Do not give anything to an unconscious person
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 eye.
	Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE -- SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

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

You may also contact the National Poison Control Center 24-hour Emergency Hotline at: 1-800-222-1222.

NOTE TO PHYSICIAN

POISONING SYMPTOMS - Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, and muscle tremors.

TREATMENT - Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use morphine or 2-PAM. However, for exposure to methomyl and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment as described above.

EPA Reg. No.: 81598-9

Manufactured By: Rotam LIMITED 26/F, E-Trade Plaza 24 Cheung Lee Street Chai Wan, Hong Kong ACCEPTED

02/19/2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 0450000

81598-9

EPA Est. No.: 87759-CHN-001

Net Contents:

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER POISON

FATAL IF INHALED. FATAL IF SWALLOWED. MAY BE FATAL IF GETS IN EYES. DO NOT BREATHE DUST. DO NOT GET IN EYES OR ON CLOTHING. WEAR PROTECTIVE EYEWEAR. WEAR LONG-SLEEVED SHIRT AND LONG PANTS, SOCKS, CHEMICAL-RESISTANT SHOES, AND CHEMICAL RESISTANT GLOVES (SUCH AS BARRIER LAMINATE OR BUTYL RUBBER). FOR HANDLING ACTIVITIES, USE A NON-POWERED AIR PURIFYING RESPIRATOR EQUIPPED WITH AN N-, R-, P-, OR HE-SERIES FILTER. Remove and wash contaminated clothing before reuse.

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Keep out of any body of water. 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.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

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 Environmental Protection Agency Registration for their formulated products. This technical product may only be used for the manufacture of insecticide products for the following uses:

TERRESTRIAL FOOD CROPS: Alfalfa; Anise (Fennel); Apple; Asparagus; Avocado; Beans (dried-type); Beans (succulent); Beets (roots and tops); Bermudagrass; Blueberry; Carrot (roots and top); Chicory; Corn (field); Corn (pop); Corn (sweet); Cotton; Eggplant; Garlic; Grapefruit; Groundcherry (strawberry tomato/tomatillo); Horseradish; Lemon; Lentils; Mint; Nectarine; Onions (green and bulb); Orange; Peach; Peanuts; Pear; Peas (field); Peas (succulent); Pecan; Pepper; Peppermint; Pomegranate; Potato (white/Irish); Radish; Sorghum; Soybeans; Spearmint; Sugar Beet; Sweet Potato; Tangelo; Tangerines; Tomato; Turnip (greens only);

Vegetable, leafy, except brassica [Group 4 includes: amaranth, leafy; arugula; cardoon; celery; celery, Chinese; celtuce; chervil; chrysanthemum, edible leaved; chrysanthemum, garland; corn salad; cress, garden; cress, upland; dandelion; dock; endive (escarole); fennel, Florence; lettuce, head; lettuce, leaf; orach; parsley; purslane, garden; purslane, winter; radicchio; rhubarb; spinach; spinach, Chinese; spinach, New Zealand; spinach, vine; swiss chard; tampala];

Vegetable, brassica leafy [Group 5 includes: broccoli; broccoli raab; broccoli Chinese; brussels sprouts; cabbage; cabbage, Chinese (bok choy); cabbage, Chinese mustard; cabbage, Chinese (napa); cauliflower; collards; kale; kohlrabi; mustard (greens); mustard (spinach); rape greens];

Vegetable, cucurbit [Group 9 includes: Chayote (fruit); Chinese waxgourd; Citron melon; Cucumber; Gherkin; Gourd, edible (*Lagenaria* spp.) (includes hyotan, cucuzza); (*Luffa acutangula*, *L. cylindrica*) (includes hechima, Chinese okra);

Momordica spp. (includes balsam apple, balsam pear, bitter melon, and Chinese cucumber); Muskmelon (hybrids and/or cultivars of *Cucumis melo*) (includes true cantaloupe, cantaloupe, casaba, crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon, and snake melon); Pumpkin (*Cucurbita* spp.); Squash, summer (*Cucurbita* pepo var. melopepo) (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, and zucchini); Squash, winter (*Cucurbita maxima*; *C. moschata*) (includes butternut squash, calabaza, and hubbard squash); (*C. mixta*; *C. pepo*) (includes acorn squash and spaghetti squash); Watermelon (includes hybrids and/or varieties of *Citrullus lanatus*)]; Wheat.

TERRESTRIAL NON-FOOD CROPS: Tobacco (excluding shade grown), Tree nuts (non-bearing), and Turf.

This product may be formulated into end use products for the indoor/outdoor non-food use sites listed below only if all the restrictions listed below apply to the registration of the end use product.

- 1. No uses in or around homes or any other place where children are likely to be present.
- 2. The end use product for these use sites will be limited to use in bait stations four feet off the ground, except the end use products may be used as scatter bait only in EPA approved commercial agricultural production areas.
- 3. An embittering agent must be added to all end use products at concentrations of at least 20-50 ppm.
- 4. End use products must be an EPA approved color.
- 5. All end use fly bait products must contain separate use directions for scatter bait and bait station uses.

INDOOR/OUTDOOR NONFOOD USES: dog kennels; fur-bearing animal units; farm buildings; poultry houses; commercial, industrial and institutional areas (outdoor); eating establishments (outdoors, nonfood areas); food processing, handling and storage plants/areas (outdoor, nonfood areas); garbage areas, garbage cans, and trash bins; meat processing plants (nonfood areas); poultry processing plants (nonfood areas).

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store Rotam Methomyl Technical in a cool, dry place away from food, drink, and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements).

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

CONTAINER DISPOSAL:

Plastic Containers: Nonrefillable Container. Do not reuse or refill this container. Completely empty container into formulation equipment by shaking and tapping sides and bottom to loosen clinging particles. If not emptied in this manner, the container may be considered an acute hazardous waste and must be disposed in accordance with local, state and federal regulations. When completely empty, offer for recycling if available or puncture and dispose of container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

EMERGENCY RESPONSE

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

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 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.

To the extent consistent with applicable law, ROTAM LIMITED 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 LIMITED 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 LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Amendment deleting barley, oats, and rye 81598-920150116.V1 Page **5** of **5**

ROTAM LIMITED 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 LIMITED.