



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 19, 2016

Anna Armstrong  
Agent for Rotam Agrochemical Company Ltd.  
Rotam Agrochemical Company Ltd.  
c/o Wagner Regulatory Associates, Inc.  
PO Box 640  
Hockessin, DE 19707

Subject: Label Amendment –Adding me-too crops  
Product Name: Rotam Clethodim MUP  
EPA Registration Number: 81598-13  
Application Date: 09/30/2016  
Decision Number: 522574

Dear Ms. Armstrong:

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.

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

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with FIFRA section 6. If you have any questions, please contact Lisa Pahel by phone at (703) 347-0459, or via email at [pahel.lisa@epa.gov](mailto:pahel.lisa@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Kraft for". The signature is fluid and cursive.

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

Enclosure

# Rotam Clethodim MUP

## FOR MANUFACTURING HERBICIDES ONLY

**ACTIVE INGREDIENT:**

Clethodim [(E)-2-[1-[[[3-chloro-2-propenyl)oxy]imino]propyl]-5-[2-(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one]..... 37.0%

**OTHER INGREDIENTS:** ..... 63.0%

**TOTAL:** ..... 100.0%

Contains petroleum distillates.

**KEEP OUT OF REACH OF CHILDREN**

### WARNING - AVISO

Si usted no entiende la etiqueta, bus que a alguien para que se la explique a usted en detalle.

(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
<b>IF ON SKIN OR CLOTHING:</b>	<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 treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<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 treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give any liquid to a person.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF INHALED:</b>	<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 by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<p><b>NOTE TO PHYSICIAN:</b> Ingestion of this product or subsequent vomiting may result in aspiration of light hydrocarbon liquid which can cause pneumonitis. If ingested, probable mucosal damage may contraindicate the use of gastric lavage.</p>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at <b>1-800-858-7378</b>, Monday through Friday, 9 a.m. to 5 p.m. After 5:00 p.m., call your poison control center at <b>1-800-222-1222</b>.</p>	

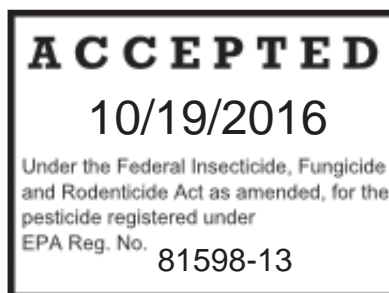
EPA Reg. No. 81598-13

EPA Est. No. \_\_\_\_\_

Net Contents: \_\_\_\_\_

**Manufactured By:**

Rotam Limited  
 Unit 6, 26/F Trend Centre,  
 29 Lee Chung Street  
 Chai Wan, Hong Kong



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**WARNING.** Harmful if swallowed or absorbed through skin. Causes skin irritation. Causes moderate eye irritation. Do not get on skin or on clothing. Avoid contact with eyes. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. 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 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.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use or store near heat or open flame.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may only be used to formulate herbicide products for the following use(s):

**1. Terrestrial Food Uses:**

- **Root Vegetables, except Sugar Beet - Crop Subgroup 1B**
- **Tuberous and Corm Vegetables - Crop Subgroup 1C**
- **Leaves of Root and Tuber Vegetables - Crop Group 2**
- **Bulb Vegetables - Crop Group 3**
- **Onion, Bulb - Crop Subgroup 3-07A**
- **Leafy Vegetables (except brassica)- Crop Subgroup 4**
- **Leafy Greens - Crop Subgroup 4A**
- **Leaf Petioles - Crop Subgroup 4B**
- **Brassica (Cole) Leafy Vegetables - Crop Subgroup 5**
- **Head and Stem Brassica - Crop Subgroup 5A**
- **Leafy Brassica Greens - Crop Subgroup 5B**
- **Legume Vegetables (Dried and Succulent) - Crop Group 6**
- **Fruiting Vegetables - Crop Groups 8-10**
- **Cucurbit Vegetables – Crop Group 9**
- **Melon - Crop Subgroup 9A**
- **Squash/Cucumber - Crop Subgroup 9B**
- **Pome Fruit - Crop Group 11-10**
- **Stone Fruit - Crop Group 12-12**
- **Caneberry - Crop Subgroup 13-07A**
- **Bushberry - Crop Subgroup 13-07B**
- **Low Growing Berry (except Cranberry) - 13-07G**
- **Herbs - Crop Group 19A**
- **Rapeseed - Crop Subgroup 20A**
- **Sunflower - Crop Subgroup 20B**
- **Cotton Seed - Crop Subgroup 20C**
- **Individual Crops:** alfalfa (including sainfoin, holy clover, birdsfoot trefoil), artichoke (Globe), asparagus, canola, clover, cotton, cranberry, dry beans, field corn, flax, garlic, hops, leaf lettuce, mint, mustard seed, dry bulb and green onions, peach, peanut (including perennial), safflower, sesame, soybean, stevia (dried leaves), strawberry, sugar beet, sunflower, and turnip.

2. **Terrestrial Non-Food Uses:** Greenhouses, Shadehouses, lathhouses, nurseries, outdoor non-food uses: Conifer trees, Christmas trees, fallow land (and other non-producing agricultural areas), ornamentals, non-bearing food crops, non-crop or non-planted areas, golf courses, native prairie warm season grass restoration projects, residential outdoor, and Niger seed (*Guizotia abyssinica*) grown for use as wild bird feed.
3. Uses for which EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
4. Uses for experimental purposes that are in compliance with EPA registration for the formulated products. Each formulator is responsible for obtaining EPA registration for their end-use product(s).

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. 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 HANDLING:** Refillable container. Refill this container with clethodim only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. For final disposal, offer for recycling or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

### 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 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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