



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 14, 2021

Mr. Walter G. Talarek  
Authorized Agent  
Heads Up Plant Protectants, Inc.  
c/o Walter G. Talarek PC  
5153 Allison Marshall Dr.  
Warrenton, Va. 20187

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Revising application instructions and warranty statement  
Product Name: Heads Up RTA Seed Treatment  
EPA Registration Number: 81853-3  
Application Date: 12/02/2021  
OPP Submission Number: 1079204  
OPP Case Number: 00337045

Dear Mr. Talarek:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or 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 (1) copy of the final printed labeling before you release this 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 your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims

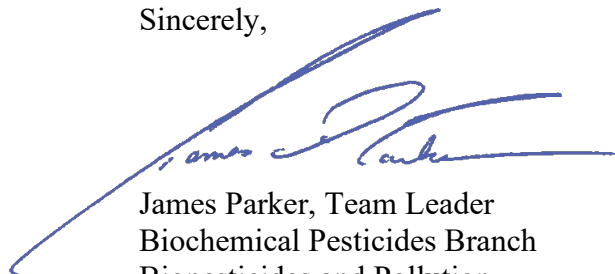
Page 2 of 2  
EPA Reg. No. 81853-3  
OPP Submission No. 1079204  
OPP Case No. 00337045

made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA 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 Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Nina Naimy via email at [naimy.nina@epa.gov](mailto:naimy.nina@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "James Parker", is written over a long, sweeping horizontal line.

James Parker, Team Leader  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)  
Office of Pesticide Programs

Enclosure

## HEADS UP® RTA SEED TREATMENT

**Preplant seed treatment for the suppression of fungal and bacterial diseases of plants**  
(including Sudden Death Syndrome (*Fusarium virguliforme*) on soybeans, Rhizoctonia root rot/damping off (*Rhizoctonia solani*) and Pythium (*Pythium spp.*) on soybeans and White Mold (*Sclerotinia sclerotiorum*) on soybeans and dry beans)

### ACTIVE INGREDIENT

Extract of *Chenopodium quinoa* saponins (containing approximately  
equimolar amounts of triterpene bidesmosidic  
glycosides of oleanolic acid, hederagenin,  
and phytolaccagenic acid) ..... 1.179%

OTHER INGREDIENTS ..... 98.821%

TOTAL ..... 100.000%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

FIRST AID	
<b>If in eyes</b>	- Hold eye open and rinse slowly and gently with water for 15-20 minutes. - Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. - Call a poison control center or doctor for treatment advice.
<b>If inhaled</b>	- 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 a poison control center or doctor for further treatment advice.
HOT LINE NUMBER For 24-hour Medical Emergency Treatment Information 1-866-368-9306	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	

NET CONTENTS: 100 oz.

EPA Registration Number 81853-

EPA Establishment Number 81853-CAN-2

Heads Up Plant Protectants, Inc.  
3002 Millar Ave. Saskatoon SK. Canada S7K 5X9  
Telephone: 1-866-368-9306

## PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals. Caution.** Causes moderate eye irritation. Harmful if inhaled. Avoid contact with eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

**Personal Protective Equipment (PPE) Requirements:** Applicators and handlers must wear long-sleeved shirt and long pants, shoes, socks and waterproof gloves. For spray applications, wear protective eyewear. Follow manufacturer's instructions for maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**Environmental Hazards:** Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment washwater or rinsate. This pesticide is toxic to fish and aquatic invertebrates. Do not use seed or seedlings treated with this product for animal feed. Do not use treated seed for food, feed or oil purposes. Treat only those seeds needed for immediate use and planting. Do not store excess treated seed beyond planting time. Dispose of excess treated seed by burial away from streams and bodies of water.

## DIRECTIONS FOR USE

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

Do not apply this product through any type of irrigation system.

Use this product only in accordance with the directions for use on the label.

Read entire directions for use and conditions of sale and warranty before using, and if said terms are not acceptable, return the product unused in its unopened container immediately.

Seed treatment on agricultural establishments in hopper-box, or other seed treatment application at or immediately before planting is within the scope of WPS.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State and Tribe, consult the State/Tribal agency responsible for pesticide regulation.

## AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about the Personal Protective Equipment (PPE), notification to workers, and restricted-entry interval. The requirements of this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Exception: If the product is soil injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas (that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water) is: coveralls, socks and shoes and waterproof gloves.

## NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticide (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

There are no restrictions.

## GENERAL INFORMATION

**Heads Up® RTA Seed Treatment** is a preplant seed treatment for the suppression of fungal and bacterial diseases of plants.

**Heads Up® RTA Seed Treatment** is made from plant sources. Apply this product as directed to seeds, as part of a general disease management program.

**TREAT ONLY HEALTHY VIGOROUS SEED OR SEEDLINGS:** Application of **Heads Up® RTA Seed Treatment** to damaged or diseased seed or seed of low quality or vigor will not improve seed performance. Always apply to healthy seed or seedlings that are vigorous and actively growing under stress-free conditions.

Note: This product does not contain dye and is not covered by an appropriate tolerance, tolerance exemption, or other clearance under the Federal Food, Drug, and Cosmetic Act. To comply with 40 CFR 153.155, therefore, all seed treated commercially with this product must be colored with an EPA-approved dye or colorant of a suitable color to prevent accidental use as food for man or feed for animals.

## APPLICATION DIRECTIONS

**Thoroughly coat the surface of the seed.** Agitate the solution before application. Return any unused solution to the original container.

Clean application equipment. Use only the amount of solution needed to be applied to treat the seeds.

Unused solution should be disposed according to the Storage and Disposal section of this label.

## PREPLANT SEED TREATMENT

## SITES

Soybean, Dry Bean, Corn, Chickpea, Field Pea and Wheat

Heads Up® RTA Seed Treatment may be applied in combination with other seed treatments for use on soybeans, dry beans, corn, field peas and wheat.

**Shake well before using.**

**The 100-ounce solution of Heads Up® RTA Seed Treatment will treat 400 units (20,000 lbs. of seed) at a rate of 0.5 oz per 100 lbs. of seed for soybeans, dry beans, field peas and wheat.**

**For corn, chickpeas, and soybeans\*\*, the 100-ounces solution of Heads Up® RTA Seed Treatment will treat 200 units (10,000 lbs. of seed) at a rate of 1.0 oz per 100 lbs. of seed. Adding Heads Up® to a tank with agitation at the treater is recommended. Heads Up® RTA Seed Treatment can be mixed with other products (seed treatments or inoculants) or applied in a separate tank with pump to treater. Use the following chart to verify use rates per CWT. (100 lbs. of seed.)**

**\*\*For high *Pythium spp.* pressure, use the high rate at 1 oz / 100 lbs of seed. See chart below.**

**Note\* For application instructions for potato seed follow instructions on the following pages.**

#### **Stability on seed**

**Once Heads Up® RTA Seed Treatment is applied to the seed, the product is totally stable. There are no restrictions on the number of days prior to planting when the Heads Up® product can be applied or requirements for special storage or treated seed.**

#### **Further Application instructions**

Seeds must be prepared and ready for seeding. The object is to achieve a wet shiny appearance to the seed. This will dry off or be absorbed by the seed; however, the treatment will remain in effect. Treat the seeds by dipping, spraying or dribbling the solution into a rotating auger conveyor or some other approved seed treatment device. Spray applications to seeds within an enclosed spray booth or other enclosed spray device are also acceptable providing thorough coverage is achieved.

Proper calibration and operation of application equipment is essential. Treat only the seed that you intend to plant and ensure all treated seed is used for planting purposes.

**Application Rates – for 100-ounce solution of Heads Up® RTA Seed Treatment**

<b>Crop</b>	<b>Target Disease</b>	<b>Product Use Rate fl. oz./CWT (100 lbs of seed)</b>	<b>Remarks/Restrictions</b>
<b>Soybean</b>	Rhizoctonia Root Rot / Damping off (Rhizoctonia solani); White Mold (Sclerotinia sclerotiorum); Sudden Death Syndrome (Fusarium virguliforme).	0.5 oz	*Total volume of all liquid / all products being applied must achieve 5- 8 fl. oz / 100 lbs. of seed
<b>Soybean**</b>	Pythium spp.	0.5 oz – 1.0 oz	*Total volume of all liquid / all products being applied must achieve 5- 8 fl. oz / 100 lbs. of seed  **Under high Pythium spp. pressure use the high rate (1.0 fl. oz. / 100 lbs of seed)
<b>Dry Bean</b>	Rhizoctonia Root Rot / Damping off (Rhizoctonia solani); White Mold (Sclerotinia sclerotiorum);	0.5 oz	*Total volume of all liquid / all products being applied must achieve 5- 8 fl. oz / 100 lbs. of seed
<b>Corn</b> (Includes Field Corn, Sweet Corn)	Common rust – Puccinia sorghi	1.0 oz	*Total volume of all liquid / all products being applied must achieve 5- 8 fl. oz / 100 lbs. of seed
<b>Chickpea</b>	Seedling diseases caused by Fusarium and Rhizoctonia spp.	1.0 oz	*Total volume of all liquid / all products being applied must achieve 5- 8 fl. oz / 100 lbs. of seed
<b>Field peas</b>	Seedling diseases caused by Fusarium and Rhizoctonia spp.	0.5 oz	*Total volume of all liquid / all products being applied must achieve 5- 8 fl. oz / 100 lbs. of seed
<b>Wheat</b>	seedling diseases caused by Fusarium and Rhizoctonia spp.	0.5 oz	*Total volume of all liquid / all products being applied must achieve 5- 8 fl. oz / 100 lbs. of seed
<b>Potato</b> (cut or whole tubers used for planting purposes)	Rhizoctonia Canker and Black Scurf (Rhizoctonia solani); Brown Spot (Alternaria alternata)	*See Remarks	*see instructions on following page

## PREPLANT SEED TREATMENT

### SITES

Potatoes

Seed Potatoes (as cut or whole tubers used for planting purposes)

100- ounce container of Heads Up® RTA Seed Treatment will treat 12,760 lbs. – 33,756 lbs. of seed.

Use rate is 0.2962 oz/ 100 lbs. to 0.783 oz / 100 lbs.

### APPLICATION

Seeds must be prepared and ready for seeding. The object is to achieve a wet shiny appearance to the seed. This will dry off or be absorbed by the seed; however, the treatment will remain in effect. Treat the seeds by dipping, spraying or dribbling the solution into a rotating auger conveyor or some other approved seed treatment device. Spray applications to seeds within an enclosed spray booth or other enclosed spray device are also acceptable providing thorough coverage is achieved.

**For seed potatoes**, whether fresh cut or suberized, **Head Up® RTA Seed Treatment must be applied to germinating seed potatoes**, as indicated by obvious sprouting activity coming from the potato eyes. This sprouting activity can be from peeking to full spout length, but before green leaves appear.

Proper calibration and operation of application equipment is essential. Treat only the seed that you intend to plant and ensure all treated seed is used for planting purposes.

Recommended use: bulk up Heads Up® RTA seed treatment (through dilution with other products / water / additional liquid carrier at application) to achieve 0.5 - 1 gallon total volume of liquid per ton of seed to ensure adequate and complete coverage of seed (cut or whole tubers used for planting purposes)

### STORAGE AND DISPOSAL

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

**Pesticide Storage:** Store in original container, tightly sealed, in a dry location.

**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:** Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available, or dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

### BATCH CODE:

### CONDITIONS OF SALE AND WARRANTY

Seller's guarantee shall be limited to the contents and merchantability of the product and the terms of the label, and subject thereto. To the fullest extent permitted by law, the buyer assumes all risks to persons or property arising out of use or handling and accepts the product on these conditions. Because the time, place, rate of application and other conditions of use are beyond the Seller's control, to the fullest extent permitted by law, Seller's liability from storage, handling and use of this product is limited to replacement of the product or a refund of the purchase price. **Heads Up® RTA Seed Treatment** is applicable as a disease preventive only. The directions for use of this product are based on test plots, greenhouse trials and the opinions of experts. They are believed to be reliable and correct; however, it is not possible to eliminate all possible detrimental effects associated with use, whether they are crop injury, ineffectiveness or other unintended consequences which may occur as a result of weather or other materials, or the manner of use or



application, beyond the control of the manufacturer or the seller. To the fullest extent permitted by law, the buyer shall assume all risks.

[The following optional information may or may not be placed on the product's label.]

***Heads Up***® is a trademark of Heads Up Plant Protectants, Inc.