

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 10, 2014

Cheryl Wagner
Agent for Red Eagle International LLC
Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Subject: Label Amendment – Adding Turnup Greens to the Label
Product Name: Clethodim Technical
EPA Registration Number: 85678-21
Application Date: 10-27-14
Decision Number: 497119

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.

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.

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 Erik Kraft by phone at 703-308-9358, or via email at Kraft.Erik@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Kraft", is written over a faint, larger signature of "Shaja Joyner".

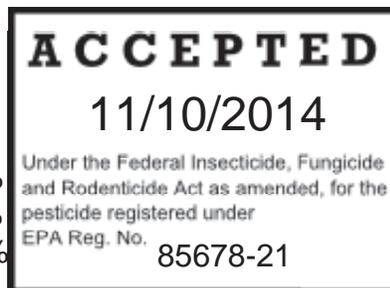
Shaja Joyner, Product Manager 20
Fungicide and Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs Office of Pesticide Programs

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Enclosure

CLETHODIM TECHNICAL

For Formulation of Herbicide Products



ACTIVE INGREDIENT:

*Clethodim95.5%

OTHER INGREDIENTS:.....4.5%

Total:.....100.0%

*(E)-2[1-[[[(3-Chloro-2-propenyl)oxy]imino]propyl]-5-[2(ethylthio)propyl]-3-hydroxy-2-cyclohexen-1-one

**KEEP OUT OF REACH OF CHILDREN
 WARNING**

| FIRST AID | |
|---|--|
| If on skin or clothing: | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice. |
| If in eyes | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call a poison control center or doctor for treatment advice. |
| If swallowed | <ul style="list-style-type: none"> • 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 do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| 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 a poison control center or doctor for further treatment advice. |
| NOTE TO PHYSICIAN | |
| Probable mucosal damage may contraindicate the use of gastric lavage. | |
| Hot Line Number | |
| Have the product container or label with you when calling 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 at 1-800-424-9300 . | |

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 85678-21

EPA Est. No.

Net Contents:_____

Manufactured for: RedEagle International LLC
 1925 E Edgewood Drive, Ste 105,
 Lakeland, FL 33803

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

WARNING: Causes skin and eye irritation. Harmful if swallowed or inhaled. Do not get on skin or clothing. Avoid contact with eyes. Avoid breathing vapors. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash 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 OF CHEMICAL HAZARDS

Do not use or store near heat or open flame.

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS, USE DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

THIS PRODUCT IS FOR USE IN FURTHER PREPARATION OF HERBICIDE PRODUCTS. DO NOT USE FOR ANY OTHER PURPOSES. Products formulated with Clethodim Technical will require registration with the Environmental Protection Agency.

DIRECTIONS FOR USE

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

Only for formulation into herbicide products intended for:

1) The following use(s):

TERRESTRIAL FOOD USES: Alfalfa, Artichoke (Globe), Asparagus, Canola, Clover, Corn (Field), Cotton, Cranberry, Beans (Dry), Beets (Sugar), Flax, Garlic, Hops, Lettuce (Leaf), Mint, Mustard Greens, Mustard Seed, Peach, Peanuts, Safflower, Sesame, Soybeans, Strawberry, Sunflower, Tomatoes, and **Turnip greens.**

Root vegetables Crop Group Subgroup 1B: Beets (Garden), Burdock (edible), Carrot, Celeriac, Chervil (Turnip-rooted), Chicory, Ginseng, Horseradish, Parsley (Turnip-rooted), Parsnip, Radish, Radish (Oriental), Rutabaga, Salsify, Salsify (Black and Spanish), Skirret, Turnip (including greens),

Root vegetables Crop Group Subgroup 1C: Arracacha, Arrowroot, Artichoke (Chinese and Jerusalem), Canna (Edible), Cassava (Bitter and Sweet), Chayote (Root), Chufa, Dasheen, Ginger, Leren, Potato, Sweet Potato, Tainer, Tumeric, Turnip (including greens), Yam (Bean and True),

Leaves or Root and Tuber Vegetables Crop Group 2: Beet (Garden and Sugar), Burdock (edible), Carrot, Cassava (Bitter and Sweet), Celeriac, Chervil (Turnip-rooted), Chicory, Dasheen (Taro), Parsnip, Radish, Radish (Oriental), Rutabaga, Salsify (Black), Sweet Potato, Tanier (Cocovam), Turnip (including greens), Yam (True),

Bulb Vegetables Crop Group 3: Garlic (Bulb and Great head (Elephant)), Leek, Onion (Dry Bulb and Green, Welsh), and Shallot,

Leafy Greens Crop Group Subgroup 4A: Amaranth, Arugula, Chervil, Chrysanthemum (Edible leaved and Garland), Corn Salad, Cress, (Garden and Upland), Dandelion, Dock, Endive, Lettuce, Orach, Parsley, Purslane (Garden and Winter), Radicchio (Red Chicory), Spinach (All),

Leafy Petioles Crop Group Subgroup 4B: Cardoon, Celery, Celery (Chinese), Celtuce, Fennel (Florence), Rhubarb, Swiss Chard,

Head and Stem Brassica Crop Group Subgroup 5A: Broccoli, Broccoli (Chinese), Brussels Sprouts, Cabbage, Cabbage (Chinese (napa) and Chinese Mustard), Cauliflower, Cavalo Broccolo, Kohlrabi, Turnip Greens

Leafy Brassica Greens Crop Group Subgroup 5B: Broccoli Raab, Cabbage (Bok Choy), Collards, Kale, Mizuna, Mustard Greens, Mustard Spinach, Rape Greens, Turnip Greens

Legume Vegetables Crop Group 6 (except soybeans): Bean (*Lupinus* spp.) (includes grain lupin, sweet lupin, white lupin, and white sweet lupin), Bean (*Phaseolus* spp.) (includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean), Bean (*Vigna* spp.) (includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean), Broad bean (fava bean) (*Vicia faba*), Chickpea (garbanzo bean) (*Cicer arietinum*), Guar (*Cyamopsis tetragonoloba*), Jackbean (*Canavalia ensiformis*), Lablab bean (hyacinth bean) (*Lablab purpureus*), Lentil (*Lens esculenta*), Pea (*Pisum* spp.) (includes dwarf pea, edible-pod pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea), Pigeon pea (*Cajanus cajan*), and Sword bean (*Canavalia gladiata*),

Fruiting Vegetables (Except Cucurbits) Crop Group 8: Eggplant, Groundcherry, Pepino, Pepper including bell pepper, chili pepper, cooking pepper, pimento and sweet pepper, Tomatillo, and Tomato

Cucurbit Vegetables Crop Group Melon Subgroup 9A: Cantaloupe, Citron Melon, Honeydew Melon, Muskmelon, and Watermelon

Cucurbit Vegetable Crop Group Squash/Cucumber Subgroup 9B: Chayote (fruit), Chinese Waxgourd, Cucumber, Gherkin, Gourd (Edible), *Momordica* spp., Pumpkin, Squash (Summer and Winter)

Berry and Small Fruit Crop Group Caneberry Subgroup 13-07A: Blackberry, Loganberry, Raspberry (Red and Black), Wild Raspberry, cultivars, varieties and/or hybrids of these,

Berry and Small Fruit Crop Group Bushberry Subgroup 13-07B: Aronia Berry, Blueberry (Highbush and Lowbush), Buffalo Currant, Chilean Guava, Currant (Black and Red), Elderberry, European Barberry, Gooseberry, Cranberry (Highbush), Honeysuckle (Edible), Huckleberry (Jostaberry), Juneberry, Lingonberry, Native Currant, Salal, Sea Buckthorn, Cultivars, varieties and/or hybrids of these,

Herbs and Spice Crop Group, Herbs Subgroup 19A: Angelica, Balm, Basil, Borage, Burnet, Camomile, Catnip, Chervil (Dried), Chive, Chive (Chinese and Clary), Coriander (Leaf), Costmary, Culantro (Leaf), Dillweed, Horehound, Hyssop, Lavender, Lemongrass, Lovage (Leaf), Marigold, Marjoram (Origanum spp.), Nasturtium, Parsley (Dried), Pennyroyal, Rosemary, Rue, Sage, Savory (Summer and Winter), Sweet Bay, Tansy, Tarragon, Thyme, Wintergreen, Woodruff, and Wormwood.

NON-FOOD USES (Indoor): Greenhouses, Shadehouses, and Lathhouses.

NON-FOOD USES (Outdoor): Ornamentals, Golf Courses, Nurseries, Native prairie warm season grass restoration projects, Niger Seed (*guizotia abyssinica*) grown for use as wild bird feed, Non-Bearing Food Crops (Apples, Berries, Cherry (sweet), Citrus Fruits, Grapes, Olives, Peaches, Pears, Prunes, Stone Fruits, Strawberries, Tree Nuts (Almond, Filbert, Pecan, Pistachio, Walnut), Conifer Trees, Christmas Trees, Fallow Land (and other non-producing agricultural areas), and Non Crop or non-Planted Areas.

2) Uses for which USEPA has excepted the required data and/or citations of data that the formulator has submitted in support of registration; and

3) Uses for Experimental Purposes that are in Compliance with the USEPA Requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

Pesticide Storage: Keep pesticide in original container. Do not put concentrate or dilute into food or drink containers. Store in a cool dry place.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container handling and disposal:

REFILLABLE CONTAINER: Refill this container with pesticide 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 a 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 a rinsate collection system. Repeat this rinsing procedure two more times. For final container disposal, 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.

NONREFILLABLE CONTAINER (EQUAL TO OR LESS THAN 5 GALLONS): 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 and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ 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 more times. Offer for recycling, if available or puncture and dispose of in a sanitary landfill.

LIMITATION OF WARRANTY AND LIABILITY

Read the entire directions for use, conditions of warranties and limitations of liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following

CONDITIONS, DISCLAIMER OF WARRANTIES, and LIMITATIONS OF LIABILITY.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of RedEagle International LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, RedEagle International LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of RedEagle International LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, RedEagle International LLC disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at RedEagle International LLC's election, the replacement of product.