FIFRA SECTION 24(c) – SPECIAL LOCAL NEED

FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF WASHINGTON

HELM AGRO INTENDS THAT THIS PRODUCT WILL ONLY BE DISTRIBUTED BY
THE WALLA WALLA SWEET ONION GROWERS ASSOCIATION TO
CONTRACTED GROWERS

HELM AGRO
RO-NEET® HERBICIDE
EPA Reg. No. 74530-16
EPA SLN No. WA-xxxxxx  WA-150005

This label for RO-NEET HERBICIDE expires and must not be distributed or used in
accordance with this SLN registration after December 31, 2019.

DIRECTIONS FOR USE
• It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
• This labeling must be in the possession of the user at the time of application.
• Follow all applicable directions, restrictions, Worker Protection Standard requirements, and
precautions on the EPA-registered label.

SPINACH: Apply 1/3 to ½ gallon of RO-NEET HERBICIDE (2 to 3 lbs. ai) in a minimum of
10 gallons of water per acre. Use on sandy mineral soils only. Apply as a surface broadcast
application with ground application equipment prior to planting. Immediately (within minutes)
after application thoroughly mix RO-NEET HERBICIDE into the soil to a depth of 2 to 3 inches
using a finishing disk, harrow, rolling cultivator similar implement capable of providing uniform
incorporation. For a list of weeds controlled refer to the EPA-registered RO-NEET HERBICIDE
label.

WEEDS CONTROLLED:

<table>
<thead>
<tr>
<th>Weed Type</th>
<th>Scientific Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual bluegrass</td>
<td>Poa annua</td>
</tr>
<tr>
<td>Annual Ryegrass</td>
<td>Lolium multiflorum</td>
</tr>
<tr>
<td>Barley, volunteer</td>
<td>Hordeum spp.</td>
</tr>
<tr>
<td>Barnyardgrass (watergrass)</td>
<td>Echinochloa spp.</td>
</tr>
<tr>
<td>Crabgrass</td>
<td>Digitaria spp.</td>
</tr>
<tr>
<td>Foxtails</td>
<td>Setaria spp.</td>
</tr>
</tbody>
</table>
Wild oats  Avena fatura

ANNUAL BROADLEAF WEEDS
Black nightshade  Solanum nigrum
Hairy nightshade  Solanum villosum
Henbit, deadnettle  Lamium spp.
Lambsquarters  Chenopodium album
Nettleleaf goosefoot*  Chenopodium murale
Purslane common  Portulaca oleracea
Redroot pigweed  Amaranthus retroflexus
Shepherdspurse  Capsella bursa-pastoris
Small stinging nettle/  Urtica urens
Burning nettle
Velvetleaf**  Abutilon theophrasti
*California excluded
**Partial control or suppression only

The above broadleaf weeds will be controlled only if application is made when conditions are favorable for germination. RO-NEET HERBICIDE SELECTIVE HERBICIDE WILL NOT CONTROL ESTABLISHED OR GERMINATED WEEDS PRESENT AT APPLICATION.

PERENNIAL WEEDS
Yellow nutsedge  Cyperus esculentus
Purple nutsedge  Cyperus rotundus

Existing stands of nutsedge must be turned under and chopped thoroughly before treatment. Prior to planting, RO-NEET HERBICIDE must be thoroughly mixed into the soil or applied subsurface to the soil with injectors for nutsedge control.

RESTRICTIONS / PRECAUTIONS:
• The restricted entry interval (REI) for RO-NEET HERBICIDE is 48 hours. Do not allow entry by unprotected persons into the treated area during the REI.
• Make only one (1) application per growing season.
• For use under this SLN label do not apply this product through any type of irrigation system.
• For Use on Sandy Mineral Soils Only.

WSDA CONTAINER DISPOSAL GUIDANCE:
Pesticide containers must be properly cleaned prior to disposal. The best time to clean empty pesticide containers is during mixing and loading, because residue can be difficult to remove after it dries. Triple rinse (or pressure rinse) the pesticide container, empty all pesticide rinse water into the spray tank, and apply to a labeled crop or site. Recycling cleaned containers is the best method of container disposal. Information regarding the recycling of empty and cleaned plastic pesticide containers in Washington is available on the WSDA Waste Pesticide Program web site at http://agr.wa.gov/PestFert/Pesticides/WastePesticide.aspx. Cleaned containers may also be disposed of in a sanitary landfill, if permitted by the county. Burning is not a legal method of container disposal in Washington.
HELM AGRO’S Special Conditions and Disclaimer for use of Ro-Neet Herbicide on Spinach

All growers planning to apply RO-NEET HERBICIDE to spinach grown for canning should attend the orientation meeting regarding this special use of RO-NEET HERBICIDE hosted by Walla Walla Sweet Onion Growers Association.

HELM AGRO intends that this Section 24(c) label be distributed by the Walla Walla Sweet Onion Growers Association only to end users and/or growers who agree in writing to the terms and conditions required by the Walla Walla Sweet Onion Growers Association including a waiver and release from all liability and indemnification by the user and/or grower of HELM AGRO, Walla Walla Sweet Onion Growers Association, and others for failure to perform and crop damage from the use of RO-NEET HERICIDE on spinach grown for canning. If such terms and conditions are unacceptable, return RO-NEET HERBICIDE at once unopened.

This product when used on spinach grown for canning may lead to injury, loss, or damage. HELM AGRO recommends that the user and/or grower test this product in order to determine its suitability for such intended use. The Walla Walla Sweet Onion Growers Association and HELM AGRO make this product available to the user and/or grower solely to the extent the benefit and utility, in the sole opinion of the user and/or grower, outweigh, the extent of potential injury associated with the use of this product. HELM AGRO intends that because of the risk of failure to perform or crop damage that all such use is at the user’s and/or grower’s risk, to the extent consistent with applicable law.

This Special Conditions and Disclaimer statement is required by HELM AGRO and is not required by the USEPA or the WSDA.

RO-NEET HERBICIDE is a trademark of Helm Agro US, Inc.

24(c) Registrant:

HELM AGRO, INC. EPA SLN NO: WA-XXXXXX  WA-150005
4042 Park Oaks Blvd., Suite 330
Tampa, FL 33610
EPA SLN NO: WA-XXXXXX  WA-150005
Label Rev.
United States Environmental Protection Agency  
Office of Pesticide Programs, Registration Division (7505G)  
Washington, DC 20460

Application for/Notification of State Registration of a Pesticide To Meet a Special Local Need  
(Pursuant to section 24(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as Amended)

1. Name and Address of Applicant for Registration  
Helm Agro US, Inc.  
4042 Park Oaks Blvd., Suite 330  
Tampa, FL 33610

2. Product is (Check one)  
EPA-Registered  

EPA Registration Number  
74530-16

New (not EPA-Registered)  

EPA Company Number  
74530

3. Active Ingredient(s) in Product  
Cycloate

4. Product Name  
Ro-Neet Herbicide

5. If this is a food/feed use, a tolerance or other residue clearance is required. Cite appropriate regulations in 40 CFR Part 180, 185, and/or 186.  
180.212

6. Type of Registration (Give details in Item 13 or on a separate page, properly identified and attached to this form):  
(1) To permit use of a new product.  

(2) To amend EPA registrations for one or more of the following purposes:  
(2.1) To permit use on an additional crop or pest.  
(2.2) To permit use at additional sites.  
(2.3) To permit use against additional pests.  
(2.4) To permit use on additional application technique or equipment.  
(2.5) To permit use at different application rates.  
(2.6) Other (specify below)

7. Nature of Special Local Need (check one)  
☐ There is no comparable product registered by EPA for such use.  
☐ There is an EPA-registered comparable product which, under the conditions of use within the State, would be as safe and/or efficacious for such use within the terms and conditions of EPA registration.  
☐ There is an appropriate EPA-registered pesticide product that is not available.

8. If this registration is an amendment to an EPA-registered product, is it for a "new use" as defined in 40 CFR 152.3?  
☐ Yes  
☐ No  
[ ] Amended in Item 12 below

9. Has an EPA Registration and/or Experimental Use Permit for this chemical ever been issued for a new use?  
☐ Yes  
☐ No  
[ ] No Previous Permit Action

10. Has FIFRA section 24(c) registration for this use of the product ever, by another State, been issued (check applicable boxes), if known?:  
☐ Sought  
☐ Issued  
☐ Denied  
☐ Revoked

☐ No FIFRA section 24(c) Action

11. Endangered Species Act: (Give details in Item 13 or on a separate page, properly identified and attached to this form)  
Identify the counties where the pesticide will be used. If statewide, indicate "all." Provide a list of Federally protected endangered/threatened species which occur in the areas of proposed use.

12. Indicate use status of Special Local Need, i.e., planned dates of use:  
From: 8/1/2014  
To: 12/31/2019

13. Comments (attach additional sheet, if needed)

Certification  
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Applicant or Authorized Representative  
[Signature]

Title  
Agent for Helm Agro US, Inc.

Telephone Number  
610-793-3222

Data 8/4/2014

Determination by State Agency  
This registration is for a Special Local Need and is being issued in accordance with section 24(c) of FIFRA, as amended. To the best of our knowledge, the information above is correct, except as noted in "Comments" below or in attachments.

Comments (by State Agency Only)  
Replacement for SLN# WA-010021  
Use on Spinach by the Walla Walla Sweet Onion Growers Association contracted growers.

EPA Form 8570-25 (Rev. 1-94)  
EPA COPY
April 1, 2015

Tawanda Maignan, Team Leader
Risk Integration, Minor Use, and Emergency Response Branch
U.S. EPA Office of Pesticide Programs (7505 P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

RE: EPA SLN Registration Number WA-150005

Dear Tawanda,

Enclosed is Washington Special Local Need (SLN) registration number WA-150005 issued to Helm Agro US for the use of RO-NEET Herbicide (EPA Reg. No. 74530-16) on spinach for control of annual weeds. This registration was issued under authority of Section 24(c) FIFRA.

There is a special local need in Washington for the use of Cycloate to control annual weeds in spinach crops. Other products are either not labeled for this use or not as effective as Cycloate on target weeds. This SLN registration is being issued as an eventual replacement for WA-010021 which has expired and is expected to be cancelled. The Pacific Northwest Vegetable Association has shown support through a letter from Judson Hedine, past president and current board member.

An exemption from tolerance for residues of Cycloate has been established (refer to 40 CFR 180.212).

WSDA has issued this SLN registration with an expiration date of December 31, 2019.

If you have any questions, please contact me at (360) 902-2031 or by e-mail at esimons@agr.wa.gov.

Sincerely,

PESTICIDE MANAGEMENT DIVISION
William “Eddie” Simons
Registration Specialist

Enclosures

cc: Barbarette Young-Henry, Wagner Regulatory Associates
    Judson Hedine, CHS-Farmers Co-Op & Pacific Northwest Vegetable Association