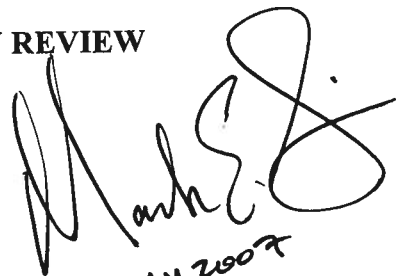


PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - IB



4 MAY 2007

DATE: 4 May 2007

EPA REG. NUMBER: 81824-I

PRODUCT NAME: Borathor

REGISTRANT: Ensystem II, Inc.

PM: Richard Gebken, PM10
REVIEWER: Melody Banks

DECISION #.: 379379
DP BARCODE: 334042

ACTION: R31

ACTIVE INGREDIENT(S): 011103, Boron Sodium Oxide, tetrahydrate
.....99.98%

TYPE: Liquid Concentrate

OPPTS GUIDELINE(S): 810.1000
810.3000
810.3600

MRID: See Below

SITES: Structural Protection

PESTS: Termites

STUDY SUMMARIES:

MRID:

40196501	Submitted	GLP? No.
40196502	Submitted	GLP? No.
40196503	Submitted	GLP? No.
40196504	Submitted	GLP? No.
40196505	Submitted	GLP? No.
40196506	Submitted	GLP? No.
40196507	Submitted	GLP? No.
40196508	Submitted	GLP? No.
40196509	Submitted	GLP? No.
40196510	Submitted	GLP? No.
40196511	Submitted	GLP? No.
40196512	Submitted	GLP? No.
40196513	Submitted	GLP? No.
40196514	Submitted	GLP? No.
40196515	Submitted	GLP? No.
40196516	Submitted	GLP? No.
40196517	Submitted	GLP? No.
40196518	Submitted	GLP? No.
40196519	Submitted	GLP? No.
40196520	Submitted	GLP? No.
40196521	Submitted	GLP? No.
40196522	Submitted	GLP? No.
45432108	Submitted	GLP? No.
45640501	Submitted	GLP? No.
45640502	Submitted	GLP? No.
45640503	Submitted	GLP? No.
45640504	Submitted	GLP? No.
45640505	Submitted	GLP? No.
45640506	Submitted	GLP? No.
45640507	Submitted	GLP? No.
45640508	Submitted	GLP? No.
46557601	Submitted	GLP? No.
46557602	Submitted	GLP? No.
46557603	Submitted	GLP? No.

The data submitted were public literature and assorted unpublished citations. The data were not product specific and do not expand support for claims against termites beyond those currently accepted for powder borates. The database and the citations provided by the registrant support wood protection claims for this product. However, they do not support claim that use of the product will provide structural protection.

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The label is generally acceptable, but all reference to structural protection must be removed. The product has not been demonstrated to provide such results. Remove all references to structural protection. This includes, but is not limited to, the label sections and subsections "Preventative Treatment of Wood in Structures Under Construction With A Liquid Solution (Pretreatment or Pretreat)" and "Subterranean Termite Only Preventative Treatment to Structures Under Construction (Subterranean Termite Pretreatment)."

Enclosure
075801-0000U S804237-ER

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

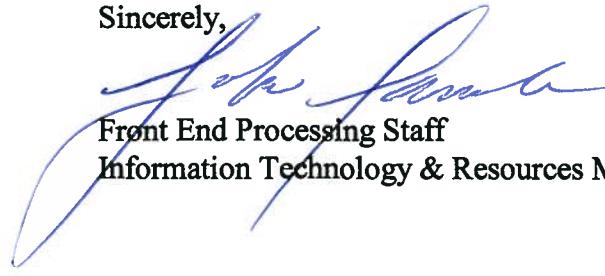
By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division