



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

OFFICE OF
PREVENTION PESTICIDES AND
TOXIC SUBSTANCES

Mr Michael Kellogg
Agent
Etigra
c/o Pyxis Regulatory Consulting, Inc
4110 136th Street NW
Gig Harbor, WA 98332

MAR 2 2007

Re Change in Primary Brand Name and Minor Label Revisions
EPA Registration No 79676-5
Submission Dated January 24, 2007

Dear Mr Kellogg

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 24, 2007, for the product Etigra – Chlorpyrifos G-Pro 2.32% Granules. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards, of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

2048

Please read instructions on reverse before completing form

Form Approved OMB No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1 Company/Product Number 79676 5	2 EPA Product Manager J Hebert	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) Etigra / Chlorpyrifos G Pro 2 32% Granules	PM# 4	
5 Name and Address of Applicant (Include ZIP Code) Etigra c/o Pyxis Regulatory Consulting Inc 4110 136th St NW Gig Harbor WA 98332 <input type="checkbox"/> Check if this is a new address	6 Expedited Review In accordance with FIFRA Section 3(c)(3) (b)(i) my product is similar or identical in composition and labeling to EPA Reg No _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION 11/24/07
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application	
<input checked="" type="checkbox"/> Notification Explain below	<input type="checkbox"/> Other Explain below	

Explanation Use additional page(s) if necessary (For section I and Section II)

Notification of a change in primary brand name and minor label revisions per PRN 98 10 The new primary brand name is Chlorpyrifos E Pro 2 32% Granules This notification is consistent with the provisions of PR Notice 98 10 and EPA regulations at 40 CFR 152 46 and no other changes have been made to the labeling or the confidential statement of formula of this product I understand that it is a violation of 18 U S C Sec 1001 to willfully make any false statement to EPA I further understand that if this notification is not consistent with the terms of PR Notice 98 10 and 40 CFR 152 46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA

Section - III

1 Material This Product Will Be Packaged In				2 Type of Container	
Child Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If Yes Unit Packaging wgt	No per container	If Yes Package wgt	No per container
3 Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4 Size(s) Retail Container		5 Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6 Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)			
Name Michael Kellogg	Title Agent	Telephone No (Include Area Code) 253 853 7369	
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			6 Date Application Received (Stamped)
2 Signature 	3 Title Agent		
4 Typed Name Michael Kellogg	5 Date 11/24/07		

PYXIS REGULATORY CONSULTING, INC

4110 136th St NW
Gig Harbor, WA 98332

Phone 253 853 7369
Fax 253 853 5516
Email www.PyxisRC.com

January 24, 2007

COURIER DELIVERY

John Hebert (PM 4)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U S Environmental Protection Agency
Room S-4900 One Potomac Yard
2777 S Crystal Drive
Arlington, VA 22202-4501

RE	Etigra – Chlorpyrifos G-Pro 2 32% Granules (EPA Reg No 79676-5) Notification of a Change in Primary Brand Name and Minor Label Revisions per PRN 98-10
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Dear Mr Hebert,

On behalf of Etigra please find the enclosed change in primary brand name notification per PR Notice 98-10 for Etigra's Chlorpyrifos G-Pro 2 32% Granules (EPA Reg No 79676-5) The new primary brand name is, "Chlorpyrifos E-Pro 2 32% Granules"


The sentence “Etigra™ is a trademark of Etigra” has also been added to the trademark reference section

In support of this notification, we enclose the following

- 1 Completed Application for Registration (EPA Form 8570-1)
2 One (1) copy of the Chlorpyrifos E-Pro 2 32% Granules labeling with changes tracked
3 One (1) copy of the Chlorpyrifos E-Pro 2 32% Granules labeling with changes incorporated
4 Copy of Agency letter confirming change in EPA Company Name and Address dated May 17,
2006
5 Letter of Authorization

Please note The Chlorpyrifos G-Pro 2 32% Granules registration was originally issued to Gro-Pro LLC. Gro-Pro LLC is now conducting business as “Etigra” (please refer to enclosed change in company name letter). The company name and address change has been incorporated with this notification submission. Please feel free to call me if you have any questions or need any additional information.

Sincerely,


Michael Kellogg

Enclosures

Chlorpyrifos E-Pro 2.32% Granules

For effective long lasting control of Chinch Bugs, Asian Roaches, Fire Ants, Fleas, Ticks, Foraging Ants, Mole Crickets and other outdoor insects

ACTIVE INGREDIENT

Chlorpyrifos (O O diethyl O (3 5 6-trichloro-2-pyridinyl) phosphorothioate)

2.32%

OTHER INGREDIENTS

97.68%

TOTAL

100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID Organophosphate	
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 the poison control center or doctor Do not give anything by mouth to an unconscious person
If in eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes Remove contact lenses, if present after the first 5 minutes then continue rinsing eye Call a poison control center or doctor for treatment advice
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing Rinse skin immediately with plenty of water for 15-20 minutes Call a poison control center or doctor for treatment advice
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 by mouth-to-mouth if possible Call a poison control center or doctor for further treatment advice
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. If exposed, plasma and red blood cell cholinesterase tests may indicate degree of exposure (baseline data are useful). Atropine, only by injection, is the preferable antidote. Oximes such as 2-PAM/protopam, may be therapeutic if used early, however use only in conjunction with atropine. In case of severe acute poisoning use antidotes immediately after establishing an open airway and respiration.	

See inside label booklet for additional PRECAUTIONARY STATEMENTS

EPA Reg No 79676-5

EPA Est. No.

Manufactured for
Etigra™
501 Cascade Pointe Lane
Suite 103
Cary NC 27513
www.etigra.com

Chlorpyrifos E-Pro 2.32% Granules contains chlorpyrifos, the active ingredient used in Dursban®

Net Weight 50 lbs

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

Causes moderate eye irritation Avoid contact with eyes and clothing Harmful if swallowed

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Loaders applicators and all other handlers must wear

- long-sleeved shirt and long pants
- socks and shoes

In addition to the above loaders must wear

- chemical-resistant gloves such as natural rubber \geq 14 mils
- chemical-resistant apron
- a NIOSH-approved dust mist filtering respirator with MSHA/NIOSH approval number prefix TC-21C or a NIOSH-approved respirator with any N R P or HE filter

Follow manufacturer's instructions for cleaning/maintaining PPE If no such instructions for washables exist use detergent and hot water Keep and wash PPE separately from other laundry

User Safety Recommendations

Users should

Wash thoroughly with soap and water after handling and before eating drinking, chewing gum, or using tobacco

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds fish, and aquatic invertebrates Birds feeding in treated areas may be killed Clean up spilled product to reduce exposure to wildlife 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 cleaning equipment or disposing of equipment washwaters

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 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

The maximum application rate of Chlorpyrifos E-Pro 2 32% Granules for all applications on this label is 1 lb a /A

Do not enter or allow others to enter until dusts have settled

Chlorpyrifos E-Pro 2 32% Granules may be used for mound treatment control of imported fire ants⁽⁷⁾ Chlorpyrifos E-Pro 2 32% Granules also controls Ants (including Carpenter Argentine and Foraging) Armyworms (Beet Fall, Yellowstriped), Centipedes, Chinch Bugs⁽²⁾ Clover Mites, Cutworms Crickets, Earwigs, Fiery Skipper, Fleas, Grasshoppers⁽³⁾ Greenbugs⁽³⁾ Leafhoppers, Millipedes, Mole Crickets⁽⁴⁾ Roaches (Asian), Sod Webworms (Lawn Moth)⁽³⁾, Sow Bugs Springtails Ticks (Brown Dog Tick)⁽¹⁾ Turfgrass Weevil (Hyperodes) White Grubs, European Crane Fly, Southern Chafer, Japanese Beetle, and June Beetle (Larvae)⁽⁵⁾ Bluegrass Billbugs⁽⁶⁾ (Refer to the numbered paragraphs in the SPECIFIC DIRECTIONS section of this label for specific insect control application information)

1 lb of Chlorpyrifos E-Pro 2 32% Granules treats up to 1 000 sq ft

SPECIFIC DIRECTIONS

The following numbered paragraphs correspond to numbers in parenthesis () from the list of insects in the DIRECTIONS FOR USE section above. Insects not numbered may be controlled by following the GENERAL DIRECTIONS section of this label. Repeat treatments as needed for control.

(1) Brown Dog Ticks & Fleas

Use 0.5 lb /500 sq ft (1.0 lb /1,000 sq ft) for area control of these insects infesting golf course turf, road medians and exterior areas of industrial plant sites. DO NOT allow public use of treated area during applications.

(2) Chinch Bugs

Apply $\frac{3}{4}$ lb Chlorpyrifos E-Pro 2 32% Granules per 750 to 1,000 sq ft (40 to 43 lbs per acre) when insects appear and/or their damage is imminent. To prevent damage, apply as soon as daily temperatures reach 80°F and repeat every 2 months. Use the lower rate as a preventative treatment or for light infestation. Use the higher rate when insects are present in large numbers and turf is being damaged.

(3) Sod Webworms

For sod webworms, apply Chlorpyrifos E-Pro 2 32% Granules at the rate of 40 lbs per acre. Delay watering or mowing the treated area for 12 to 24 hours after treatment. Treat in the spring or when insects first appear troublesome. Additional treatments at 30-day intervals may be needed for new infestations.

(4) Mole Crickets

Use 40 lbs of Chlorpyrifos E-Pro 2 32% Granules per acre. Treat suspected problem areas when insects become a problem or as recommended by your local Agricultural Extension Service Specialist.

The best time to control Adult Mole Crickets

March to August – egg-laying time

February to September – best time to control crickets

(5) White Grubs Crane Fly Larvae

To control White Grubs, Black Turfgrass Ataenius, European Crane Fly, Southern Masked Chafer, Japanese Beetle and June Beetle (larvae). Use 40 lbs Chlorpyrifos E-Pro 2 32% Granules per acre. Apply enough water to thoroughly wash the insecticide into the turf to improve efficacy. For best results, remove thatch first and treat when grubs are young and actively feeding near the soil surface, usually during late July and August. Consult your local Agricultural Extension Service Specialist for best time to treat.

European Crane Fly larvae will be controlled using 1.0 lb Chlorpyrifos E-Pro 2 32% Granules per 1,000 sq ft or will be controlled simultaneously with the same application being applied for control of White Grubs. Consult your local Agricultural Extension Service Specialist for best time to apply. For best results, first remove thatch. Water the granules into the soil.

(6) Bluegrass Billbugs

Use 35 lbs Chlorpyrifos E-Pro 2 32% Granules per acre. To improve control, apply enough water to wash granules into the soil where insects are feeding.

(7) Imported Fire Ant Control

Mound Treatment – For treatment of Fire Ant mounds. For Professional Use Only. Treat individual ant mounds measuring from 3 to 12 inches in diameter by applying $\frac{1}{2}$ tablespoon of granules evenly in a circle around the outer edges (1 to 2 feet from the center) of the mound.

Finish the treatment by applying 1 tablespoon of granules sprinkled evenly over the center of the mound. After granule application, gently sprinkle the treated area with a minimum of 1 quart of water per 6 inches of mound diameter. Apply in cool weather (65° to 80°F) or in early morning or late evening. Best results will be obtained if mound is not disturbed after treatment, thus allowing ants to come and go and to be exposed to the insecticide. Repeat treatments as needed for additional control but not more than once every 7 days.

GENERAL DIRECTIONS FOR USE ON GOLF COURSE TURF ONLY

Apply Chlorpyrifos E-Pro 2 32% Granules uniformly to golf course turf using any hand or power operated type spreader designed for application of granules. Treat at the rate of 1.0 lb/1,000 sq ft (43 lbs Chlorpyrifos E-Pro 2 32% Granules per acre) when surface insects first appear. Increase this rate as indicated for control of certain soil insects under the SPECIFIC DIRECTIONS section of this label. For best efficacy, sprinkle the turf with water to move the granules into the zone of insect infestation. Repeat treatment as necessary. Observe the watering limitation described in (3) Sod Webworms in the SPECIFIC DIRECTIONS section of this label.

RATE TO USE FOR SURFACE INSECTS

For control of Ants (including Carpenter, Argentine and Foraging), Armyworms (Beet, Fall Yellowstriped), Centipedes, Chinch Bugs, Clover Mites, Cutworms, Crickets, Earwigs, Fiery Skipper, Fleas, Grasshoppers, Greenbugs, Leafhoppers, Millipedes, Sod Webworms (Lawn Moth), Sowbugs, Springtails, and Ticks (Brown Dog Tick) – use 1.0 lb /1,000 sq ft.

FOR SOIL FEEDING INSECTS

Refer to the SPECIFIC DIRECTIONS section of this label (paragraphs (3), (4), and (5)) for rates to control the listed turf insects that feed below the soil surface. When using a spreader, calibrate with each application by accurately weighing a few pounds into the spreader and apply to a measured area. Adjust spreader setting in order to ensure the correct rate of application.

NOTE: The age, condition of spreader and operator speed can cause a wide variation of rates.

PERIMETER TREATMENT AROUND BUILDINGS AT INDUSTRIAL PLANT SITES (SUCH AS AROUND WAREHOUSES, FOOD PROCESSING AND FOOD MANUFACTURING SITES) – USE FOR CRAWLING INSECT CONTROL

Use Chlorpyrifos E-Pro 2 32% Granules to protect against insects entering indoors. Place a band of granules around the outside of the building to kill Ants (including Carpenter, Argentine and Foraging), Ticks (Brown Dog Tick), Crickets, Earwigs, Fleas, Millipedes, Roaches (Asian), Sowbugs, and Springtails before they attempt to enter. Use 0.5 lb Chlorpyrifos E-Pro 2 32% Granules to treat 500 sq ft (as a band 5 ft x 80 ft long) around the structure. Apply when insects have become troublesome or before they cause problems in the spring or early fall. Repeat one month later and then as needed for control but not more than once every 7 days. Keep the public (especially children and pets) off treated areas until the granules are sprinkled in and the area is dry.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE Store in original container in a cool, dry, locked place out of the reach of children.

PESTICIDE DISPOSAL Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. 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 DISPOSAL Completely empty bag into application equipment Then 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

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE Read the entire Directions for Use and Conditions of 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 Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application weather, presence of other materials or other influencing factors in the use of the product which are beyond the control of Etigra or Seller All such risks shall be assumed by Buyer and User and Buyer and User agree to hold Etigra and Seller harmless for any claims relating to such factors

Etigra 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 this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Etigra, and Buyer and User assume the risk of any such use **ETIGRA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE**

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Etigra and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Etigra

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Etigra™ is a trademark of Etigra