



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 29, 2021

Karen Larson
Vice President, Product Innovation & Government Affairs
Clarke
675 Sidwell Ct
St. Charles, IL 60174

Subject: PRIA Amendment – Updating Container Type (MRIDs 51436401,
51436402, 51436403)
Product Name: ANVIL 2+2 ULV
EPA Registration Number: 8329-61
Application Date: 2/10/21
Decision Number: 570896

Dear Ms. Larson:

The Agency has reviewed the subject studies in response to the PRIA amendment request referred to above, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act. Studies 51436402, 51436403 have been classified as acceptable in supporting the subject products. The non-detect of PFAS, except for PFBA¹, in non-fluorinated container material and in Baritainer (Kortrax®) material is also consistent with US EPA BEAD's Analytical Chemistry Branch's results. It is, therefore, unlikely that the use of non-fluorinated containers including Baritainer (Kortrax®) would contribute to the contamination of PFAS in products stored in these containers.

The bridging argument submitted to fulfill the Storage Stability and Corrosion Characteristic Guidelines (Guidelines 830.6317 and 830.6320) required under 40 CFR § 158.310 has been classified as unacceptable because product-specific data should be submitted to fulfill the guidelines. These guidelines are thus not satisfied. A one-year study is required to satisfy these data requirements.

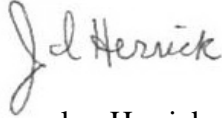
The PRIA amendment is approved and the new container is acceptable. You have 18 months from the date of this letter to provide the confirmatory Storage Stability and Corrosion Characteristic studies.

¹ The fluorinated container and non-fluorinated containers samples as well as the method blank had a detection of one PFAS compound; PFBA. This result is explained as being from a contamination (with exception of the fluorinated container sample, where PFBA was present in much higher quantities and is not thought to be only from contamination). The presence of PFBA at similar levels in the samples and the method blank often may indicate solvent or instrument contamination. The reported levels of PFBA measured in the non-fluorinated samples and the method blank are those from a second round of analysis and were on the order of ~0.05 µg/kg. All were below the study RL (Reporting Limit) but above the MDL (Method Detection Limit). In the first analysis of these samples, the level of PFBA was higher than the RL. Because the results fall below the RL in the second analysis of the samples, no further action/analysis was deemed necessary.

Page 2 of 2
EPA Reg. No. 8329-61
Decision No. 570896

If you have any questions, please contact Jacquelyn Herrick by phone at 703-347-0559, or via email at herrick.jacquelyn@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "J. Herrick". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Jacquelyn Herrick, Product Manager 03
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs