



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

April 12, 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, 51470701)  
Product Names: Anvil 10+ 10 ULV, Natular 2EC, Natular 20EC, Merus 3.0  
EPA Registration Numbers: 8329-62, 8329-82, 8329-106, 8329-108  
Application Dates: 2/10/2021, 2/15/2021  
Decision Numbers: 570893, 579898, 570901, 570907

Dear Ms. Larson:

The Agency has reviewed the subject studies in conjunction with the products referred to above, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act. The studies have been classified as acceptable in supporting the subject products. The product chemistry data are sufficient in support of the container exchange program. The non-detect of PFAS, except for PFBA<sup>1</sup>, 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 acceptability of the new container type is confirmed.

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

Sincerely,

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

Enclosure

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<sup>1</sup> 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.