

10951-19

3-30-2007

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAR 30 2007

Mr. Masuo Robinson
Agent
Britz Fertilizers, Inc.
c/o Robinson Associates
583 Canyon Road
Redwood City, CA 94062

RE: Correct the First Aid Statement for if Swallowed as well as Misspelled Words
EPA Registration Number: 10951-19
Date of Submission: January 23, 2007

Dear Mr. Robinson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 23, 2007, for the product, Britz Fertilizers, Inc. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions 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

2/8

EPA United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other - Notification	OPP Identifier Number RA2002
Application for Pesticide - Section 1			
1. Company/Product Number 10951-19		2. EPA Product Manager John Hebert	
4. Company/Product (Name) Britz Fertilizers, Inc.		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Britz Fertilizers, Inc. c/o Robinson Associates 583 Canyon Rd. Redwood City, CA 94062 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below	
NOTIFICATION			
MAR 30 2007			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Minor changes to the label as highlighted on the attached label. Corrected the first aid statement for if swallowed as well as misspelled words. 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:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
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"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name Masuo Robinson		Title Agent	Telephone No. (Include Area Code) 650.361.1101
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 Masuo Robinson		5. Date January 23, 2007	

BFR 440 SUPREME SPRAY OIL

notification

NOTIFICATION

MAR 30 2007

ACTIVE INGREDIENT:	BY WT.
Petroleum Oil.....	99.00%
INERT INGREDIENTS.....	1.00%
TOTAL	100.00%
Unsulfonated Residue.....	95.00%
Aromatic Composition ASTM D2140	0.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

If swallowed:	<ul style="list-style-type: none"> •Call a poison control center or doctor immediately for treatment advice. •Do not give ANY liquid to the person. •Do not induce vomiting unless told to do so by a 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 eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, continue rinsing. •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.
In inhaled:	<ul style="list-style-type: none"> •Move person to fresh air. •If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth to mouth if possible. •Call a poison control center or doctor for further treatment advice.

NOTE TO PHYSICIAN: Contains petroleum distillates. Vomiting may pose aspiration pneumonia.

FOR MEDICAL EMERGENCY INVOLVING THIS PRODUCT, CALL: 1-800-228-5635, EXT. 136 OR CALL COLLECT, 612-851-8180, EXT. 136.

EPA REG. NO. 10951-19
EPA EST. NO. 10951-CA-1

NET CONTENTS _____ GAL. (_____) L

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS & DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin or inhaled. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. This product is a potential skin sensitizer. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Personal Protective Equipment (PPE):

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category E on the EPA chemical resistance category selection chart.

Applicators and other handlers must wear: long-sleeved shirt and long pants, chemical-resistant gloves, such as barrier laminate, nitrile rubber, butyl rubber, neoprene or viton, and shoes plus socks.

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

Engineering controls statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets with requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water. Apply this product only as specified on the label.

PHYSICAL OR CHEMICAL HAZARDS

Do not weld, heat, or drill this container. Residue may ignite with explosive violence if heated sufficiently.

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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

4/8

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR, Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval of 4 hours.

PPE require for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is: coveralls, waterproof gloves, shoes plus socks.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers. Do not contaminate other pesticides, fertilizers, water, food, or feed by storage or disposal.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call collect: CHEMTREC (800) 424-9300.

To confine spill: If liquid, dike surrounding area or absorb with sand, cat litter or commercial clay. If dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or an approved waste disposal facility.

CONTAINER DISPOSAL: **Metal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. **Plastic:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay of smoke.

APPLICATION

For applications, the spray tank must be free of any sulfur residue before using BFR 440 Supreme Spray Oil. Do not combine this product with any type of sulfur spray. Do not apply BFR 440 Supreme Spray Oil after a sulfur application until sufficient time has passed for safety (at least 30 days). Do not apply sulfur after an application of BFR 440 Supreme Spray Oil until sufficient time has passed for safety (at least 30 days). If doubts exist, spray BFR 440 Supreme Spray Oil mixture on a portion of one tree that was treated with sulfur. If no burn is noted in several days, enough time has passed. Do not spray when temperatures are above 95°F or when temperatures drop below 35°F. Do not use on foliage closer than 60 days after or 90 days before using Captan or Folpet products.

Application to trees weakened by disease, drought, drying winds, or high nitrogen application may result injury to the trees.

Do not apply this product through any type of irrigation system.

Do not apply if this product will drift to food forage or other crops that might be damaged.

BFR 440 Supreme Spray Oil must be diluted before an application is made.

MIXING DIRECTIONS

Check to make sure this product will emulsify. If the mixture is not milky after agitation, do not use this product. Do not use this material if it does not emulsify.

With the agitator running, start filling the spray tank with water. Add wettable powders or other products when the tank is one third full and always before adding BFR 440 Supreme Spray Oil. When the tank is one half full and with good agitation, add the proper amount of BFR 440 Supreme Spray Oil, then fill to the desired volume. Constant agitation must be maintained during mixing application.

DO NOT MIX with insecticides or fungicides incompatible with oil. Consult your State Agricultural Extension Service or Fieldman for specific compatibilities.

This product may be used as a carrier for appropriate insecticides and fungicides which are registered for use on deciduous fruits and nuts and which can be applied to give a uniform spray. For recommendations on timing and combinations with BFR 440 Supreme Spray Oil, Consult your local Agricultural Extension Service or Fieldman.

Use only in spray machines with powerful positive agitation. Keep agitator running at all times during spray operations.

This product is formulated as a "fast break" spray oil and will not stay in solution unless agitated constantly.

ORCHARD CONCENTRATE APPLICATION: Apply according to rates given in the table for each crop. All quantities of spray solution are for mature trees and vines with normal foliage cover. Quantities should be reduced proportionally for smaller immature trees and vines. Use only on crops listed on this label. Special concentrate spray equipment is necessary for this application.

NOTE: Use efficient equipment of the proper type. Avoid spraying during or immediately prior to hot or freezing weather (over 95°F or under 35°F), hot dry wind, rain or other unsuitable conditions; avoid over spraying or double spraying. Plants should be sprayed only when in vigorous condition and when their moisture condition is suitable.

5/8

ALMONDS, APRICOTS, CHERRIES, NECTARINES, PISTACHIOS, PEACHES, PLUMS AND PRUNES:

(Directions for use on plums and prunes in California's Sacramento Valley can be found in the table following this one):

PEST	APPLICATION RATE & TIMING	COMMENTS
Black Scale, Brown Soft Scale, European Fruit Lecanium Scale, Frosted Scale, Olive Scale, San Jose Scale, European Red Mite Eggs, Aphid Eggs, Brown Mite Eggs, Fruitree Leafroller Eggs	DORMANT AND DELAYED DORMANT: Use 1 to 2 gallons per 100 gals of water at 300 to 500 gals per acre. (Concentrate Spray: Use 5 to 7 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	Preferred timing of application for European Fruit Lecanium Scale and European Red Mite eggs is green up to Delayed Dormant and for San Jose Scale is Dormant, Green tip to delayed dormant.
Terrapin Scale	DELAYED DORMANT: Use 2 to 3 gals per 100 gals of water at 300 to 600 gals per acre. (Concentrate Spray: Use 4 to 6 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	
Cottony peach Scale	DORMANT: Use 2 to 3 gals per 100 gals of water at 300 to 600 gals per acre. (Concentrate Spray: Use 4 to 7 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	
Two Spotted Spider Mites, Pacific Mite, European Red Mite, Brown Mite	FOLIAR SPRAY: Use ½ to 1½ gals per acre. (Concentrate Spray: Do not use more than 4 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	Certain varieties of plums and prunes may be injured by all sprays, check for tolerance prior to treatment.
White Peach Scale on Peaches: Only for use in Georgia, Florida, South Carolina, North Carolina and Alabama.	DORMANT: Use 1½ to 2 gals per 100 gals of water at 300 to 600 gals per acre. (Concentrate Spray: Use 5 to 7 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	Apply before buds begin to swell in the spring. Make 2 applications 7 to 14 days apart, according to local recommendations, during the dormant period.

PLUMS AND PRUNES: (Sacramento Valley of California Only)

PEST	APPLICATION RATE & TIMING	COMMENTS
Black Scale, European Fruit Lecanium Scale, San Jose Scale, Olive Scale, Frosted Scale, Mealy Plum Aphid Eggs, Leaf Curl Plum Aphid Eggs, Brown Mite Eggs, European Red Mite Eggs	PRE-BLOOM WHEN FRUIT BUDS SHOW GREEN TIPS: Use 1½ to 2 gal per 100 gals of water at 300 to 600 gals per acre. (Concentrate Spray: Use 4 to 6 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	Application at this time is preferred.
Two spotted Spider, Pacific Spider, European Red Mite, Brown Mite	FOLIAR SPRAY: Use ½ to 1 gal per 100 gals water at 300 to 600 gals per acre. (Concentrate Spray: Use 4 gals maximum per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	Oil sprays may injure certain varieties of plums and prunes, check for tolerance prior to treatment.

For Aerial Application: Apply by air only when soil conditions do not permit regular ground application.

6/8

CITRUS: (California Only) – Lemons, Grapefruit, and Oranges (Navel and Valencia), Limes, Tangerines, Tangelos, and other citrus varieties.

PEST	APPLICATION RATE & TIMING	COMMENTS
Mites -Citrus Bud, Citrus Flat, Citrus Red, Citrus Rust Scales -Black, Brown, Soft, California Red, Citricola Purple, Yellow, Red	Central California: Apply 0.5 to 1.4 gals per 100 gals of water as thorough coverage spray (TC). Alternately, use a low volume spray (LV) to apply 2.5 to 15 gals per acre. Oxnard Plains Area: Apply 0.5 to 1.4 gals per 100 gals of water as a thorough coverage spray (TC). Alternately, use a low volume spray (LV) to apply 1 to 10 gals per acre.	Do not apply to lemons within 60 days of harvest if lemons are to be sweated. For lemons and limes, make applications in June through September. For grapefruits make applications in August through September. For oranges, make applications on navels and valencias - July through August and on tangelos, tangerines, and other citrus varieties - July through August. For navels and valencias, treatment can be made from Feb 15 to 50% bloom, to avoid injury, use low concentration (1.0%). On navel oranges, do Not apply during or after color break.
Mites -Citrus Bud, Citrus Flat, Citrus Red, Citrus Rust Scales Black, Brown Soft, California Red, Citriola, Purple, Yellow, Red		For lemon, grapefruits, oranges (navels and valencias), limes, tangelos, tangerines, and other citrus varieties, make applications as needed throughout the year. On navels, do Not apply during or after color break. Do not apply to lemons within 60 days of harvest.

Thorough coverage spray (TC): Applications achieving a uniform film wetting of all portions of the tree at 250 to 4500 gallons of spray solution per acre, the total volume is dependent of the size of the trees.

Low volume spray (LV): Applications with droplet depositions achieved on all interior and exterior parts of the tree using 20 to 100 gallons of spray solution per acre.

Do not apply prior to or during a period of excessively high temperatures above 95°F. (85° TO 95°F on the coast)

Do not apply oil sprays when trees show stress.

Consult with you local University of California Cooperative Extension Specialist or Fieldman for proper timing and spray volumes.

APPLES & PEARS

PEST	APPLICATION RATE & TIMING	COMMENTS
San Jose Scale, Italian Pear Scale Leaf Roller Eggs Pear Psylla	Dormant & Delayed Dormant: Apply 1½ to 2 gallons per 100 gallons of water in a minimum of 250 gallons per acre. (Concentrate sprays: do not use more than 6 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre). Delayed Dormant: Apply 2 gallons per 100 gallons of water at 300 to 500 gals per acre. (Concentrate Spray: Apply 5 to 6 gals per acre in a minimum of 20 gals by air or 100 gals. by ground of water per acre.) Apply 1 gallon per 100 gallons of water at 300 to 600 gals per acre. (Concentrate Spray: Apply 3 to 6 gals per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre.)	An application of an insecticide labeled for use on apples and pears will improve scale control.
Red Mites, San Jose Scale, Italian Pear Scale (immature summer stage of scales)	Summer Application (post harvest) Apply 1 gallon per 100 gallons of water at 300 to 600 gals per acre.	An application of an insecticide labeled for use on apples and pears will improve summer scale control.

AVOCADOS

PEST	APPLICATION RATE & TIMING	COMMENTS
Avocado Brown Mite, Thrips	Use 1 to 4 gals per 100 gals of water for thorough coverage in the 400 to 3000 gals per acre. (Concentrate Spray: Use 4 to 15 gals per acre in 50 to 100 gals of water per acre.) Do not exceed 30 gallons of oil per acre per application.	Apply through late fall. Consult with your local University of California Cooperative Extension Service or Fieldman for proper timing and application parameters. When an application of oil is more than 2% v/v, it is recommended that a small test area be treated and observed.

7/8

GRAPES (Dormant)

PEST	APPLICATION RATE & TIMING	COMMENTS
Mealy Bugs	Dormant: Use 1 to 2 gallons per 100 gals of water per acre with thorough coverage. Do not exceed 300 gals per acre per application	For improved control tank mix with a registered insecticide.

KIWI

PEST	APPLICATION RATE & TIMING	COMMENTS
Latonia Scale, Oleander Scale, San Jose Scale	Dormant: Apply 4 to 6 gallons per treated acre. Apply in a minimum 100 gallons of water per acre.	Do Not apply after bud break. Use the higher rate when scale populations are high.

OLIVES

PEST	APPLICATION RATE & TIMING	COMMENTS
Parlatoria Scale, Oleander scale, Black Scale	Apply 1½ gallons per 100 gallons of water as a dilute spray in 400 to 800 gallons of water per acre.	Apply prebloom or post bloom up to buckshot. Do not apply any oil between Aug 20 and harvest to Olives used for Spanish or green-ripe processing because of the risk of fruit spotting.

PECANS

PEST	APPLICATION RATE & TIMING	COMMENTS
Scales, Aphid Eggs, Mite Eggs	Apply 2 to 3 gallons in 100 gallons of water using minimum of 200 gallons water per acre. (Concentrate Spray: Apply 6 to 8 gallons per acre in a minimum of 20 gals by air or 100 gals by ground of water per acre).	Apply from late February up to bud break.

WALNUTS

PEST	APPLICATION RATE & TIMING	COMMENTS
Brown Apricot Scale, San Jose Scale, Olive Scale, Oleander Scale, Frosted Scale, Italian Pear Scale, European Fruit Lecanium, Putnam Scale, Brown Soft Scale, Red Spider Mites, Aphid Eggs	Delayed Dormant (as buds begin to swell): Apply 1 gallon per 100 gallons of water. Apply as a dilute spray in 400 to 3,000 gallons per acre. As a concentrate spray: Use 4 to 6 gallons in a minimum of 100 gals of water per acre.	Oils should not be used on walnuts during the dormant season, between bud break and shoot elongation, or on drought stressed trees.
Red Spider Mites	Summer Use: Apply 1 ½ to 2 gallons per 100 gallons of water. Apply as a dilute spray in 400 to 3,000 gallons per acre. As a concentrate spray: Use 4 to 6 gallons in a minimum of 100 gals of water per acre.	Use only on trees that have not suffered from lack of moisture during the growing season. Do Not apply if the temperature will exceed 90°F at or following application
Brown Apricot Scale, San Jose Scale (summer stage)	Summer Use: Apply 1 gallon per 100 gallons of water. Apply as a dilute spray in 400 to 3,000 gallons per acre.	Do not apply after husk split. Do Not apply if the temperature will exceed 90°F at or following application.

Manufactured By
BRITZ FERTILIZERS, INC.
 P.O. Box 366
 Five Points, CA 93624

CONDITIONS OF SALE AND WARRANTY

1. Britz Fertilizers, Inc. warrants that this material conforms to the chemical description on the label and is reasonably fit for use as a directed hereon. To the extent consistent with applicable law, Britz Fertilizers, Inc. neither makes, nor authorizes any agent or representative to make any other warranty of fitness or of merchantability, guarantee or representation, expressed or implied, concerning this material.

2. Critical and unforeseeable factors beyond the control of Britz Fertilizers, Inc prevent it from elimination all risk in connection with the use of chemicals. Such risks include, but are not limited to damage, to plants and crops to which the material is applied, lack of complete control and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated hereon and even though label directions are followed. Buyer and user acknowledge and assume all risks and liability (except those assumed by Britz Fertilizers, Inc. under 1 above) resulting from handling, storage, and use of this material.

"Britz for Results"

January 23, 2007

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
One Potomac yard
277 S. Crystal Drive
Arlington, VA 222021

Attn: John Hebert
Product Manager, Team 7

Subject: BFR 440 Supreme Spray Oil,
EPA Reg. No. 10951-19

Notification of Minor Changes to the Label.

Dear Mr. Hebert:

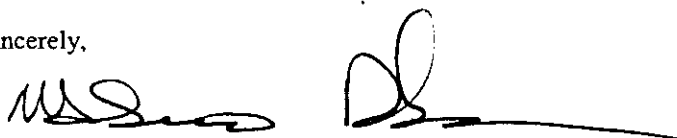
On behalf of Britz Fertilizers, Inc., we are submitting a notification to inform you of minor changes to the label. We have corrected the required language in the first aid statement for "If swallowed" and corrected several misspelled words.

In support of this notification, please find the following:

- EPA Form 8570-1; Application for Pesticide Registration dated January 23, 2007.
- Two copies of the revised label (one clean and one marked label).

Should you have any questions regarding this submission or require additional information, please call me. Please send all correspondence to Robinson Associates.

Sincerely,



Masuo Robinson
Regulatory Specialist

attachments

cc: Tim Brown, Britz Fertilizers, Inc.

ra2002

Regulatory Affairs 583 Canyon Road
Pesticide Registration Redwood City, CA 94062
Telephone
650.361.1101
Facsimile
650.361.0111
Email
masuo@ix.netcom.com