

33658-12

03-04-2011

Letter 1/6



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Frank Sobotka
IPM Resources LLC
4032 Crockers Lake Blvd.
Suite 818
Sarasota, FL 34238

MAR - 4 2011

Subject: EPA Reg. 33658-12 / Gharda Dicamba Technical Herbicide Notification

Dear Mr. Sobotka:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 1-14-11 for the product EPA Reg. 33658-12 / Gharda Technical Herbicide. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls 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 Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov or Kathryn Montague at 703-305-1243 or Montague.Kathryn@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn Montague
Team Leader
Herbicide Branch, Team 23
Registration Division (7504P)



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Gharda Chemicals Limited (33658-12)	2. EPA Product Manager K. Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Gharda Dicamba Technical Herbicide	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Gharda Chemicals Limited C/O IPM Resources LLC 4032 Crockers Lake Blvd., Suite 818 Sarasota, FL 34238 <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 _____	

NOTIFICATION

MAR 04 2011

Section - II

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

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

Submission of Notification, revised labeling for subject product in accordance with PR Notice 2007-4. The label was revised to add directions for disposal of paper bags and bulk sacks to the Storage and Disposal statements.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input checked="" type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	<input type="checkbox"/> Glass	
			No. per container	<input checked="" type="checkbox"/> Paper	
				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 40 lb Bag/50lb Bag/Bulk		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" 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 Frank E. Sobotka, Ph.D.	Title Agent for Gharda Chemicals Limited	Telephone No. (Include Area Code) 215 497-9501
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 For Gharda Chemicals Limited	
4. Typed Name Frank E. Sobotka, Ph.D.	5. Date January 14, 2011	

January 14, 2011

VIA UPS EXPRESS

~~Montague.Kathryn@epa.gov~~

Phone: 703-305-1243

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
Attention: Ms. Kathryn Montague

Subject: Notification to Revise Storage and Disposal Statements
Gharda Chemicals Limited
Product/ EPA Reg. No.: Gharda Dicamba Technical Herbicide (33658-12)

Dear Ms. Montague:

Gharda Chemicals Limited is submitting Revised Labeling for the above subject product in accordance with PR Notice 2007-4.

The label was revised to add directions for disposal of paper bags and bulk sacks to the Storage and Disposal statements.

The following are included in this submission:

EPA form 8570-1

2 copies of the Gharda Dicamba Technical Herbicide revised product label

If you have any questions concerning this submission please contact Dr. Frank E. Sobotta, Senior Partner, IPM Resources LLC.

~~Sincerely yours,~~

Frank E. Sobotka, Ph.D.
Agent for Gharda Chemical Limited



Gharda Chemicals Limited

NOTIFICATION

MAR 04 2011

GHARDA Dicamba Technical Herbicide

FOR MANUFACTURING PURPOSES ONLY

Active Ingredient:

Dicamba (3,6-dichloro-o-anisic acid)	98.3%
Other Ingredients	1.7%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID (Benzoic acid)	
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 advise.
If inhaled:	<ul style="list-style-type: none">▪ Remove 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.
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 advise.
If swallowed:	<ul style="list-style-type: none">▪ Call 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.
HOT LINE NUMBER (Benzoic acid) Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment information call: 1-(863)-359-5660	
NOTE TO PHYSICIAN Corrosive. Probable mucosal damage may contraindicate the use of gastric lavage. Causes irreversible eye damage.	

Gharda Chemicals Ltd.
660 Newtown_Yardley, Suite 106
Newtown, PA 18940
215-968-9474

EPA Reg. No.: 33658-12
EPA Est. No 33658-IND-3

Net Weight: 70 kg. (154.35 lbs.)
45 kg. (99.23 lbs.)

$$\frac{5}{6}$$

Environmental Hazards

DIRECTIONS FOR USE

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

Figure 1 displays 16 small plots arranged in a 4x4 grid, illustrating the spatial distribution of 1000 simulated individuals. The plots show the spatial distribution of 1000 simulated individuals, with the number of individuals increasing from 1 to 16 across the grid. The individuals are represented by small black dots, and the plots show the spatial distribution of the individuals, with the number of individuals increasing from 1 to 16 across the grid.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of at an approved waste disposal facility.

Container Disposal:

Nonrefillable containers - Metal: Do not use or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Fiber Drums with Liners: Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then offer for recycling if available, or dispose of liner in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

Paper Bags, Bulk Sacks: Do not reuse or refill bag/sack. Completely empty bag/sack by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then offer for recycling if available, or dispose of bag/sack in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Notice of Warranty and Disclaimer

Seller warrants that at the time of delivery the product in this container conforms to its chemical description contained hereon and is reasonably fit for its intended purpose only when used in accordance with proper manufacturing practices and procedures and under normal conditions of use. This is the only warranty made on this product. To the extent consistent with applicable law, seller expressly disclaims any implied warranties of merchantability or fitness for any purpose and, except as set forth above, any other express or implied warranties. Any damages arising from breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid for this product by Buyer, and shall not include incidental or consequential damages such as, but not limited to, loss of profits or values. It is impossible to eliminate all risks inherently associated with the use of this product. To the extent consistent with applicable law, in no case shall Seller be liable for the consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the Buyer shall assume all such risks. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

Revised: January 12, 2005 (Name/EPA Reg. No. Change)

Amended: August 17, 2010

Revised by Notification: September 14, 2010 (Paper bag/bulk sack added to Storage and Disposal)