

53883-69

04/04/2005

1/4

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

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883 - 69	2. EPA Product Manager George LaRocca	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Martin's Vegetables Plus	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <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

APR 4 2005 Section - II

<input type="checkbox"/> Amendment - Explain below.	<input 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 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 change of Warranty Statement per PR Notice 98-10. Please see highlighted text on attached labeling. 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 USC 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
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<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	
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 Kristen Van Etten	Title Regulatory Assistant	Telephone No. (include Area Code) 800-242-5562
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 Regulatory Assistant	
4. Typed Name Kristen Van Etten	5. Date 03-10-05	

2/14

[FRONT LABEL PANEL]

Martin's

Vegetables *Plus*

For Residential Use Only

- Kills troublesome outdoor insects which destroy Lawns, Roses, Flowers, Trees and Shrubs, Vegetables, Fruits, and Nuts
- Provides contact and residual control for up to 4 weeks
- KILLS OVER 100 DIFFERENT INSECTS

NOTIFICATION

APR 4 2005

ACTIVE INGREDIENT:

Permethrin 10.0%

INERT INGREDIENTS: 90.0%

TOTAL: 100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back/Side Label Panel For Additional Precautionary Statements

Net Contents _____

- **READ ENTIRE LABEL BEFORE USE**

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

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

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 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 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.
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.
NOTE TO PHYSICIAN AND VETERINARIANS: Do not administer or instill milk, cream or other substances containing vegetable or animal fats which will enhance absorption of lipophilic substances.	

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish. Do not apply directly to water. Avoid contamination of ornamental fish ponds. Drifts and runoff from treated areas may be hazardous to aquatic organisms in treated areas. Do not contaminate water when cleaning equipment or disposing of equipment washwaters. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or

weeds while bees are actively, visiting the treatment area.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Not for use on plants being grown for sale or for other commercial use, or for commercial seed production or for research purposes.

Do not apply this product in enclosed areas.

Do not use food utensils to mix or apply this product.

Keep people and pets off treated areas until the spray has dried.

SHAKE WELL BEFORE USING

THREE STEPS TO MIX AND APPLY:

1. For lawns and vegetables, measure the area to be sprayed. Calculate square feet by multiplying length by width. For all other applications, apply as a thorough cover spray.
2. Use a clean sprayer. Carefully measure and mix the amount of concentrate and water as directed.
3. Spray as directed. Thorough coverage is important. Flush sprayer with clean water after each use. Make applications when insects first appear. Repeat applications as directed.

Use Dilution rate as indicated:

1 fl.oz. = 6 tsp. or 2 Tbsp.

8 fl.oz. = 1/2 pt. or 1 cup

DIRECTIONS FOR APPLYING

HOME LAWNS

Turf	Pests	How to Use
Bentgrass, Bermudagrass, Bluegrass, Dichondra, Fescue, Irish Moss, Merion, St. Augustine Grass	Ants, Armyworms, Brown dog ticks, Chinch bugs, Crickets, Cutworms, Fleas, Grasshoppers Japanese beetle grubs, Mole crickets, Sod webworms, Ticks that carry Lyme Disease, Leafhoppers	Thoroughly wet down grass a few hours before applying. Home lawns should be no taller than 3 inches at time of application. Slightly more water may be used as long as the amount of product per area is as listed below. For ants, crickets and grasshoppers, use 1/2 fl.oz. in 3 gals. of water to cover 1,000 sq.ft. For other listed insects, use 1 1/2 fl.ozs. in 10 gals. of water to cover 1,000 sq.ft.

5/14

HOUSE PLANTS

INDOORS: TO PROTECT PLANTS IN RESIDENTIAL GREENHOUSES AND FOR INDOOR LANDSCAPING:

House Plants	Pests	How to Use
Ageratum, Ardisia, Aster, Baby's Breath, Begonia, Birdsnest Fern, Bleeding Heart, Carnation, Chrysanthemum, Coleus, Crown of Thorns, Cockscomb, Cyclamen, Dracaena, Dumbcane, English Ivy, Fuchsia, Gladiolus, Grape Ivy, Juniper, Lily, Marigold, Orchid, Palm, Pansy, Peperomia, Petunia, Philodendron, Piggy-Back Plant, Poinsettia, Portulaca, Pothos, Prayer Plant, Purple Passion, Rabbits Foot Fern, Rose, Schefflera, Snapdragon, Snake Plant, Statice, Velvet Plant, Verbena, Zinnia	Aphids, Armyworms, Corn earworms, Exposed thrips, Fall cankerworms, Inchworms, Japanese beetles, Leafminers, Leafrollers, Mealybugs, Scales, Solder mites, Spring cankerworms, Whiteflies	Mix ¼ fl.oz. in 1 gal. of water. Contact and residual: Use sufficient spray to obtain full coverage of all foliage. If application is to be made indoors, remove infested plants from living areas prior to application. Use in an area not likely to be occupied by people or pets(particularly fish). After spraying, plants can be returned to original location. Do not use more product than recommended, as this may cause some plant injury. Use with care on ferns, palms and fuchsia. As with all plants listed, especially carnations, chrysanthemums, and roses, there exists a wide variety of species and cultivars, and therefore, a wide variety of susceptibility to injury. To ascertain possible phytotoxicity, treat a few plants as described above, wait 24 hours, and check for possible injury.
Velvet Plants	Fungus Gnats	

Fire Ant Control

Individual Mound and Plant Container Treatment

Mix ½ fl.oz. in 3 gals. of water and apply as a drench using a sprinkler can. Gently apply 1 gallon of the mixture over the surface of each mound. Thoroughly wet mound and surrounding area of 3x4 ft. (12 sq.ft.). For best results apply in cool weather 65⁰-80⁰F early or late in the day. Treat new mounds as they appear. Pressurized sprays may disturb ants and cause migration which will reduce product effectiveness. **Use the same method as above for the control of Fire Ants that may nest in permanently placed containerized ornamentals plants.**

6/14

TREES & SHRUBS

Trees & Shrubs	Pests	How to Use
Arizona, Cypress, Azalea, Birch, Cherry, Non-bearing Citrus, Conifers, Elm, English Ivy, Euonymus, Weeping Fig, Fir, Honeysuckle, Lilac, Mock-orange, Oak, Palm, Philodendron, Pine, Poinsettia, Tulip Poplar, Rhododendron, Taxus	Aphids, Bagworms, Cicadas, Exposed thrips, Fall cankerworms, Inchworms, Leafminers, Leafrollers, Mealybugs, Spider mites, Whiteflies, Gypsy Moth, Tent Caterpillar, Japanese Beetles	Use ¼ fl.oz. in 1 gal. of water. Apply as a thorough spray, wetting leaves and branches to the dripping point. Try to penetrate dense foliage. Spray in the late afternoon or evening, when the temperature ranges from 50 ^o -75 ^o F and when there is little or no wind. Spray at the first sign of insects. Application can be made up to the day of collection.
Cherry, Honeysuckle	Fall webworms	
Conifer	Budworms	
Elm	Elm leaf beetles, Elm spanworms, Fall webworms	
Douglas and Grand Firs	Tussock moths	
Non-bearing Citrus	Citrus black flies	
Oak	Oakworms	

Pine	Pine beetles, Pine moths, Pine needle miners, Needle scales	
------	---	--

On Tent caterpillars, application should be made when caterpillars are young and tents are first noticed. For best results, apply in the late afternoon or evening, when caterpillars have returned to their tents. Wet tents with spray on all sides. A few caterpillars may be seen escaping from the tent; however, they should die within several hours.

ROSES & FLOWERS (ORNAMENTALS)

Roses & Flowers (Ornamentals)	Pests	How to Use
Ageratum, Aster, Ardisia, Azalea, Baby's breath, Begonia, Birds-nest fern, Bleeding heart, Carnation, Chrysanthemum, Coleus, Common Ninebark and Snowberry, Crown of thorns, Cockscomb, Cyclamen, Dracaena, Dumbcane, English Ivy, Exacum, Fuchsia, Gladiolus, Grape Ivy, Gold bells, Hypoestes, Ivy, Juniper, Lilac, Marigold, Mock-Orange, Nannyberry, Orchid, Palm, Pansy, Pea shrub, Peperomia, Petunia, Philodendron, Piggy-back Plant, Poinsettia, Portulaca, Pothos, Prayer Plant, Purple Passion, Rabbits foot fern, Rhododendron, Rose, Schefflera, Snapdragon, Snake Plant, Statice Velvet Plant, Verbena, Zinnia	Aphids, Armyworms, Bagworms, Cabbage worms, Cicadas, Cornworms, Cutworms, Exposed thrips, Fall cankerworms, Fall webworms, Fungus gnat, Inchworms, Japanese beetles, Leafminers, Leafrollers, Mealybugs, Scale crawlers, Spring cankerworms, Spider mites, Whiteflies, Rose Chafer, Psyllids, Scale Insects	Use ¼ fl. oz. in 1 gal. of water. Apply as a thorough spray, wetting the plants to the dripping point. Try to hit underside of leaves and penetrate dense foliage. Spray in the later afternoon or evening when the temperature ranges from 50°-75°F and when there is little or no wind. Spray at the first sign of insects. Application can be made up to the day of collection.

FRUITS & NUTS TREES

GENERAL DIRECTIONS

Use ½ fl. oz. in 1 gal. of water. Apply when insects appear. Wet the plants to the dripping point. Try to hit underside of leaves and penetrate dense foliage.

8/14

Fruits & Nuts Trees	Pests	How to Use
Almonds, Pecans	Navel orangeworms, Peach twig borers	Do not make more than 2 applications during hull split and 5 applications per season. Can be applied up to 7 days prior to harvest.
Apples	Green fruitworms, Aphids, Leafrollers (Oblique-banded, Redbanded), Plum curculio, Rosy apple aphids, Spotted tentiform leafminers, Tarnished plant bugs, White apple leafhoppers, Japanese Beetles	Do not make more than 3 applications. Do not apply after petal fall.
Peaches	Borers (Lesser peachtree, Peach twig), Green fruitworms, Plum curculio, Oriental fruit moths, Tarnished plant bugs	Do not apply within 7 days of harvest. Do not make more than 8 applications per season.
Pears (dormant through delayed dormant)	Pear psylla	Apply during the dormant through delayed dormant growth period only. Do not make more than 2 applications per season.
Pears (summer)	Codling Moths, Green fruitworms, Pear psylla, Aphids	Do not make more than 3 applications per season. Can be applied up to 14 days prior to harvest.

VEGETABLES

Prepare a spray solution at the dilution rates listed for each crop in the chart below. Apply the spray solution at the rate of 1 gallon to cover 440 square feet surface area.

Vegetables	Pests	How to Use
Asparagus (pre-harvest)	Asparagus beetles, Cutworms	Use ¼ fl.oz. in 2 gals. of water. Apply to ensure uniform coverage. Do not apply more than 4 applications per crop. Can be applied up to 3 days prior to harvest.
Asparagus (post-harvest)	Larval stages of asparagus beetle; Tarnished plant bugs, Lygus bugs, Adult Japanese beetle	Use ¼ fl.oz. in 1 gal. of water. Treat ferns or bush growth after spear harvest when insects are present.

Beans	Mexican bean beetle, Leafhoppers, Flea beetle, Corn earworm, Lygus and Stinkbugs	Use ½ fl.oz. in 1 gal. of water. Apply as needed, but not more than 8 applications per season. Can be applied up to 3 days prior to harvest.
Celery-see Leafy Vegetables		
Cole Crops, Broccoli, Brussels Sprouts, Cabbage, Cauliflower	Beet armyworms, Cabbage aphids and loopers, Diamondback moths, Imported cabbageworms	Use ¼ fl.oz. in 1 gal. of water. Apply every 5 days or as needed. Can be applied up to 1 day prior to harvest. Do not make more than 8 applications on Cauliflower, Brussels Sprouts and Broccoli and 10 applications on Cabbage.
Corn-see Sweet Corn		
Cucumber, Melons, Pumpkins, Squash	Flea beetle, Leafhopper	Use ½ fl.oz. in 1 gal. water. Apply as needed, but not more than 8 applications per season. Can be applied up to 3 days prior to harvest.
Cucurbits: Balsam pear(bitter melon), Chinese waxgourd(Chinese preserving melon), citron melon, cucumber, gherkin, edible gourds; melons including hybrids such as cantaloupe, casaba, crenshaw, honeydew, honey balls, mango melon, muskmelon, Persian melon, pumpkin, summer & winter squash, watermelon	Aphids, Cabbage looper, Cucumber Beetle (adults), Cutworms, Leafhoppers, Leafminers, Melonworms, Pickleworm, Plant bugs, Squash bugs.	Use ½ fl.oz. in 1 gal. water. Apply to ensure uniform coverage. Can be applied up to the day of harvest.

10/14

Eggplant	Colorado potato beetles, Vegetable leafminers	Use ¾ fl. oz. in 1 gal. of water. Apply to ensure uniform coverage. Do not exceed 16 applications. Can be applied up to 3 days prior to harvest.
Horseradish (Foliar application)	Imported crucifer weevils	Use ¾ fl. oz. in 1 gal. water. Do not exceed 3 foliar applications. Can be applied up to 22 days prior to harvest.
Head Lettuce	Corn earworms, Beet armyworms, Loopers (Alfalfa, Cabbage), Tobacco budworms	Use ½ fl. oz. in 1 gal. water. Apply every 5-10 days as needed. Do not make more than 10 applications per season. Can be applied up to 1 day prior to harvest.
<u>Leafy Vegetables:</u> Amaranth, Arrugula, Celery, Celtuce, Chervil, Corn salad, Chrysanthemum(edible-leaved and garland), cress(garden and upland), Dandelion, Dock, Endive, Fennel, Lettuce(head and leaf), Okra, Parsley, Purslane(garden and winter), Rhubarb, Spinach, Swiss chard	Alfalfa looper, Aphids, Beet armyworm, Cabbage looper, Corn earworm, Cutworms, European corn borer, Fall armyworm, Green cloverworm, Southern armyworm, Tobacco budworm, Vegetable leafminer.	Use 1/3 fl. oz. in 1 gal. water. Apply every 5 to 10 days as needed. Can be applied up to 1 day prior to harvest.
Melons-see Cucurbits		

Potatoes	Beet armyworm, Colorado potato beetle, Potato leafhopper, Potato tuberworm, Cabbage looper, Cutworms, European corn borer, Potato psyllid, Tarnished plant bug	Use ¾ fl. oz. in 2 gals. of water. Apply as needed, but not more than 12 applications. Can be applied up to 7 days prior to harvest.
Peppers	Vegetable leafminers, Cabbage looper, Flea beetle, Corn earworm, Pepper weevil, European corn borer, Green cloverworms, Leafhoppers	Use ½ fl. oz. in 1 gal. of water. Apply as needed, but not more than 8 applications per season. Can be applied up to 3 days prior to harvest.
Strawberries, Raspberries, Blueberries	Strawberry weevils, Aphids, Spider mites, Lygus bugs, Flea beetles, Omnivorous leafhopper, Spittlebugs, Japanese beetles, Field crickets, Red Spider, Leafroller, weevils .	Use ½ fl. oz. in 1 gal. of water. Allow 14 days between last application and harvest. Make no more than 8 foliar applications per growing season.
Sweet Corn	Armyworms(Fall, Southern), Corn earworms, European corn borers	Use ¾ fl. oz. in 2 gals. of water. Apply every 5 days, but not more than 6 applications per season. Can be applied up to 1 day prior to harvest.
Tomatoes	Beet and southern armyworm, Tomato pinworm, Tomato fruitworm, Horn worms, Granulate cutworms, Colorado potato beetle, Cabbage looper	Use ½ fl. oz. in 1 gal. water. Apply to ensure uniform coverage. Can be applied up to day of harvest.

NUISANCE PESTS IN OUTDOOR AREAS

GENERAL DIRECTIONS

Use 1 2/3 fl. ozs. in 1 quart of water, treating 400 linear feet with a 6-inch spray band.

OUTSIDE SURFACES OF BUILDING

Use Vegetables Plus on Ants, Clover mites, Crickets, Earwigs, Millipedes, Sowbugs (pillbugs) and spiders to help prevent infestation of buildings, treat the building foundation to a height of 2 to 3 feet, where pests are active and may find entrance. Also, apply as a residual spray to outside surfaces of building, including porches, screens, window frames, eaves, patios, garages, refuse

dumps and other areas where these pests congregate or have been seen.

OTHER OUTDOOR AREAS

Use Vegetables Plus on Ants, Crickets, Earwigs, Fleas, Ticks (**including ticks that may carry Lyme Disease**) for treatment of localized infestations of these insects in areas where there are weeds or bushy non-crop areas, spray infested areas thoroughly. **For ants**, thoroughly wet hills and runways. Repeat application only as needed to maintain insect control.

To reduce annoyance from: **Cluster flies, Flying moths, Gnats, House flies, Mosquitoes**. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages, around shrubbery, and other places where these insects alight or congregate.

STORAGE AND DISPOSAL

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

Storage: Store in cool, dry area away from children and domestic animals.

Disposal: If empty: Do not reuse this container. Do not rinse unless required for recycling. Place in trash. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Unless otherwise instructed, place in trash. Never pour unused product down the drain or on the ground.

WARRANTY STATEMENT

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Control Solutions, Inc. To the extent allowed by law, Control Solutions, Inc. shall in no event be liable for consequential, special, or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. In addition to the foregoing, no purchaser of this product (other than an end user) shall be entitled to any reimbursement for any loss suffered as a result of any suspension or cancellation of the registration for this product by the U.S. Environmental Protection Agency. Except, as expressly provided herein, Control Solutions, Inc. makes no warranties, guarantees, or representations of any kind, either expressed or implied, or by usage of trade, statutory or otherwise, with regard to the product sold, including, but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. The exclusive remedy of any buyer or user of this product for any

13/14

and all losses, injuries, or damage resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort, negligence, strict liability, or otherwise, shall be damages not exceeding the purchase price paid for this product or, at Control Solutions, Inc. election, the replacement of this product.

CONTROL SOLUTIONS, INC.
5903 GENOA-RED BLUFF
PASADENA, TEXAS 77507-1041
281-892-2500

EPA Registration No. 53883-69
EPA Establishment No. 53883-TX-002

(app. 05-01-02)



C O N T R O L
S O L U T I O N S
i n c o r p o r a t e d

March 10, 2005

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Re: Notification per (PR) Notice 98-10, Change of Warranty Statement
EPA Reg. No. 53883-69 Martin's Vegetables Plus

Dear Sir or Madam:

Enclosed is a Notification of change of the Warranty Statement per (PR) Notice 98-10. See highlighted text on attached labeling.

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 USC 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.

If you have any questions or need additional information, please feel free to contact me.

Sincerely,

Kristen Van Etten
Regulatory Assistant