

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



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

March 29, 2010

Amy Warren
Control Solutions, Inc.
5903 Genoa Red Bluff
Pasadena, TX 77507-1041

Dear Ms. Warren,

Subject: Notification of Alternate Brand Names/Optional Marketing Language,
per PRN 98-10

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated March 15, 2010, for the product "CSI Chlorpyrifos CS," EPA Registration Number 53883-264.

The Registration Division (RD) has conducted a review of these requests for their applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The information submitted with the application has been stamped "Notification" and will be placed in our records. The alternate brand names "Pyrofos™ CS" and "Pyrofos™ CS Controlled Release Premise Insecticide" have also been added to the record.

If you have any questions, please contact me directly at 703-308-8735 or email me at chao.julie@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie A. Chao".

Julie A. Chao
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883 - 264	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CSI Chlorpyrifos CS	PM# 1	
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 _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION MAR 29 2010
<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 Alternate Name and placement of already approved OPTIONAL MARKETING LANGUAGE per PR Notice 98-10. See attached labeling for highlighted portions. 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:

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	2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
quart - gallon-bulk

5. Location of Label Directions
 on label

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Amy Warren	Title Regulatory Affairs Specialist	Telephone No. (Include Area Code) 800-242-5562
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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.

2. Signature 	3. Title Regulatory Affairs Specialist	6. Date Application Received (Stamped)
4. Typed Name Amy Warren	5. Date 03-15-10	

3/10



March 15, 2010

NOTIFICATION

MAR 29 2010

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

**Re: Notification of Alternate Brand Name/Optional Marketing Language, per (PR) Notice 98-10,
 EPA Reg. No. 53883-264, CSI Chlorpyrifos CS**

Dear Sir or Madam:

Enclosed is a Notification for Alternate Brand Name and placement of already approved Optional Marketing language. Please see highlighted portions on attached label.

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.

Enclosed please find:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. Copy of proposed labeling with highlighted portions

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Warren'.

Amy Warren
 Regulatory Affairs Specialist

RESTRICTED USE PESTICIDE
 For retail sale to and use only by certified applicators or persons under their direct supervision,
 and only for those uses covered by the certified applicator's certification.

CSI Chlorpyrifos CS
Insecticide

~~(alternate name: Pyrofos™ CS)~~
~~(alternate name: Pyrofos™ CS Controlled Release Premise Insecticide)~~
 Controlled Release Premise Insecticide [optional descriptor]

NOTIFICATION
MAR 29 2010

ACTIVE INGREDIENT:
 Chlorpyrifos.....20.0%

OTHER INGREDIENTS:.....80.0%
 100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
This product contains an organophosphate that inhibits cholinesterase.	
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER	
You may also contact Safety Call@ (866) 897-8050 for emergency medical treatment information.	
NOTE TO PHYSICIAN: If symptoms of cholinesterase inhibition are present, atropine sulphate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.	

Net Contents: _____ [Gallons] [Quarts] [Fl. Oz]

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION
 Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds, fish and aquatic invertebrates. Birds feeding in the treated area may be killed. Clean up spilled product to reduce exposure to wildlife. DO NOT apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.
 This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

PHYSICAL OR CHEMICAL HAZARDS

Do not spray where electrical short circuits might result, such as wall outlets, conduits, motors, switches, etc. Do not spray directly onto or into any electronic equipment.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Restrictions:

- Do not contaminate food, feedstuffs or water supply
- All food contact surfaces and cooking utensils must be covered during treatment or thoroughly washed with an effective cleaning compound followed by a potable water rinse.
- Cover fish tanks prior to application.

DO NOT

- apply to humans, their clothing or bedding
- allow children or pets to come in contact with treated surfaces until spray has dried.
- contaminate food or use on household pets
- contaminate food preparation surfaces, kitchen utensils, dishes, or feed storage containers

PRODUCT INFORMATION: CSI Chlorpyrifos CS is a liquid microencapsulated concentrate containing the active ingredient chlorpyrifos for use in and around (within 6 to 10 feet) the following sites:

Calf Hutches and Calving Pens and Parlors, Cargo Holds of Ships, Empty Chicken Houses, Food and Non-Food Areas of Manufacturing, Industrial Plants and Food Processing Plants, Hog Barns, Milk Rooms, Railroad Boxcars *[optional]*

CSI Chlorpyrifos CS may be used to treat any surface which will not be damaged or marked by water. Heavy applications may leave a noticeable deposit. On some surfaces this deposit can be removed with a damp cloth or sponge.

CSI Chlorpyrifos CS Controls: Angoumois Grain Moths, Aphids, Ants (except carpenter, fire, harvester, and pharaoh), Bees, Beetles, Boxelder Bugs, Gadelles, Carpet Beetles, Cigarette Beetles, Clover Mites, Cluster Flies, Confused Flour Beetle, Crickets, Darkling Beetles, Dermestid Beetles, Dried Fruit Beetles, Drugstore Beetles, Earwigs, Elm Leaf Beetles, Firebrats, Flea Beetles, Flies, Gnats, Grain Mites, Indian Meal Moths, Leafhoppers, Leaf Miner, Mealworms, Mediterranean Flour Moths, Millipedes, Moths, Northern Fowl Mites, Psocids, Rod Flour Beetle, Saw-toothed Grain Beetles, Scale, Silverfish, Sowbugs, Spiders (except black widow and brown recluse), Stink Bugs, Trogoderma, and Weevils (Granary Weevils and Rice Weevils) *[optional]*

MIXING INSTRUCTIONS:

Shake product well before diluting.

Before using **CSI Chlorpyrifos CS**, thoroughly clean spray equipment. When diluting, first add approximately 1/2 of the water to the spray tank and then add the proper amount of **CSI Chlorpyrifos CS**. Add the remaining water and agitate the sprayer thoroughly. Agitate sprayer frequently during use to ensure even coverage. Shake or re-agitate sprayer if spraying is interrupted or if dilution is left in sprayer overnight. When emptying the bottle, triple rinse with water and add the rinsate to the spray tank.

If used, spray screens must be 50 mesh or larger.

In situations where conventional application methods have not or are not likely to provide sufficient coverage, foam generating equipment or similar equipment may be used to provide a

continuous coverage. Use drier foam inside wall voids to avoid any water damage or electrical short circuits.

COMMERCIAL INDOOR TREATMENTS

FOR USE IN: Food and non-food areas of manufacturing, industrial, and food processing plants, warehouses, ship holds, and railroad boxcars.

Application within food areas is limited to spot and / or crack and crevice treatments.

When using as a spot treatment, do not exceed 2 sq. ft. per individual spot. Do not re-apply more than once every 7 days.

SPRAY DILUTION CHART: Dilute **CSI Chlorpyrifos CS** with water as indicated in the chart below.

Amount of Finished Spray	0.25% Spray	0.5% Spray
1 gallon	1.5 fl oz	3 fl oz
3 gallons	4.5 fl oz	9 fl oz
5 gallons	7.5 fl oz	15 fl oz
10 gallons	15.0 fl oz	30 fl oz

NOTE: Use the higher rate for clean-outs, for longer residual control or for high insect infestations.

Apply CSI Chlorpyrifos CS as a crack and crevice residual product where insects may be hiding, living and breeding and/or for selected spot treatment.

PESTS

Cockroaches, crickets, dermestid beetles, earwigs, firebrats, millipedes, psocids, silverfish, sowbugs, spiders (except black widow or brown recluse)	Spot treat and/or make crack and crevice injections into areas where insects are normally found for example crack and crevices, void areas, moist areas, openings around pipes, sinks and under refrigerators. Repeat as necessary.
Carpet beetles (Dermestids)	Thoroughly apply the spray as a spot treatment along edges of carpet, under carpet edge (if necessary), under furniture and throw rugs. Use as a crack and crevice application in closets and other shelving where infested items are stored. DO NOT treat clothing with this product. Repeat application as necessary.
For exposed adult and larval stages of grain mites, stored product beetles, grain weevils and stored product moths	Inject into cracks and crevices and/or voids where these insects may be hiding. Infested areas include, but are not limited to, cracks and crevices in cabinets, pantries, wall voids and in machinery. Repeat application as necessary.
Ants (except carpenter, fire, harvester, or pharaoh)	Inject cracks, crevices, and voids where ants may be traveling and/or hiding, around doors, window frames, and other structural cracks, crevices and voids. Spot treatment of trails and feeding areas may also be made.
Hibernating stages of boxelder bugs, elm leaf beetles, and clover mites	Inject into cracks and crevices and/or voids where these insects may be hiding or hibernating. Infested areas include, but are not limited to, cracks and crevices in weep holes, wall voids, around window and door frames, and under siding. Repeat application as necessary. Treat wall area around entry points on exterior where insects gather.

APPLICATIONS IN FOOD PROCESSING ESTABLISHMENTS

FOR USE IN: Food and Non-Food Areas of Manufacturing, Industrial and Food Processing Plants. Non-food areas include boiler rooms, garbage rooms, drains (to sewers), entries and vestibules, machine rooms, garages, mop closets, and storage (after canning or bottling). Treating within food areas of food processing plants is limited to spot and/or crack and crevice treatments.

Treat where insects are found or normally occur. Application of a 0.25% solution is suitable for control of light pest infestations (i.e. maintenance applications). Applications of a 0.5% solution provides residual control of heavy infestations (i.e. clean-out applications) and where extended residual control is desired. A period of 4-7 days is usually required to observe maximum effectiveness on insect populations. Do not re-apply more than once per every 7 days. Apply spray solution so that spray drift is minimized to avoid non-target surfaces. When using as a spot treatment, do not exceed 2 sq. ft. per individual spot.

COMMERCIAL OUTDOOR BUILDING TREATMENTS

Outdoor commercial perimeter applications - manufacturing, industrial, and food-processing plants and warehouses	To help prevent infestations of buildings, treat band of soil 6-10 ft wide around and adjacent to the building. Also treat the building foundation to a height of 2-3 ft and where pests are active and may find entrance. Treat other insect entry points around doors, windows, under decks and on fences. This product may be applied in compressed air equipment or power spray equipment. Depending on type of equipment used to apply product and landscaping of perimeter, use 0.5 to 1.75 fl oz per 1,000 sq ft. For larger spray equipment, use 5 to 8.75 fl oz of product per 50 gallons of water applied at 10 gallons of dilution per 1,000 sq ft. (50 gallons will cover 5000 square feet.)
Ants (except carpenter, fire, harvester, and pharaoh), crickets, and other crawling insects	For treatment of localized infestations of these insects in outdoor areas which are landscaped, planted, mulched or unmaintained, spray infested areas thoroughly. For ants thoroughly wet hills and runways. Repeat applications as infestation warrants and as reinfestations occur. Apply at a rate of 3 fluid ounces per gallon (0.5%)
Flies	Flies must be directly contacted by spray droplets for control. Flies will be killed on contact. Apply at a rate of 5 to 8 fluid ounces per gallon per 1000 square feet. Spray where flies are seen and congregate, such as inside and outside dumpsters, and other garbage containers and garbage storage bins or areas. Apply at a rate of 3 fluid ounces per gallon (0.5%)
Hibernating stages of boxelder bugs, elm leaf beetles, and clover mites	Apply into cracks, crevices, and voids where insects may be harboring or hibernating, such as wall voids, weep holes, crevices around door or window frames, and under siding. Apply to outdoor wall surfaces around entry points where insects congregate. Apply at a rate of 3 fluid ounces per gallon (0.5%). Repeat as needed, at least 7 days apart.

LIVESTOCK HOUSING

FOR USE IN: Livestock Housing and Holding Areas (Hog Barns, Empty Chicken Houses, Milk rooms, Calf Hutches, Calving Pens, and Parlors).

CSI Chlorpyrifos CS may be applied in compressed air backpack or power spray equipment. Depending on type of equipment used to apply product and landscaping of perimeter, use 0.5 – 1.75 fl oz per 1,000 sq ft. For larger spray equipment, use 5 to 8.75 fl oz of product per 50 gallons of water applied at 10 gallons of dilution per 1,000 sq ft. (50 gallons will cover 5000 square feet.)

Restrictions:

- Do not apply to lactating or food animals.
- Do not contaminate milk, food, or drinking water.
- Remove all animals prior to making application to housing.
- Do not apply or allow insecticide to drift into animals.
- Do not allow animals to enter treated areas until surfaces are dry.

Flies must be directly contacted by spray droplets for control. Flies will be killed on contact. Apply at rate of 5 to 8 fluid ounces per gallon per 1000 square feet. Spray where flies are seen and congregate, such as screen doors, window frames, light fixtures, ceilings and upper corners, inside and outside dumpsters, and other garbage containers and garbage storage bins or areas.

For control of darkling beetles in poultry production facilities mix **CSI Chlorpyrifos CS** at a rate of 2 to 5 ounces/1,000 sq. ft. of floor area, in .5 gallons of water/1,000 sq. ft. of floor area. Apply to litter, paying particular attention to areas under feeder lines, water lines, and the perimeter. Conduct application as close to bird placement as possible. Repeat applications may be made just prior to placement of each flock. It is important to rotate chemical classes of insecticides on as part of a rotation program to avoid resistance to any class of insecticides.

For control of other pests and to help prevent infestations of buildings, treat a band of soil 6-10 ft wide around and adjacent to the building. Also treat the building foundation and sides where pest are active and may enter. Treat other insect entry points such as doors, windows, under siding and eaves of structure.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store upright at room temperature. Avoid exposure to extreme temperatures.

Spill Procedures: In case of spillage or leakages, soak up with an absorbent material such as sand, sawdust, earth, Fuller's earth, etc. Dispose of with chemical waste.

Pesticide Disposal: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal:

For Containers equal to or less than 5 Gallons : Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available. If recycling is not available: then dispose of container in a sanitary landfill or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

For Containers greater than 5 Gallons: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 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. Offer for recycling if available. If recycling is not

available: then dispose of container in a sanitary landfill or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

For Bulk containers: (Refillable Container) Refill this container with pesticides only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the re-filler. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or re-circulate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

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. All such risks shall be assumed by the Buyer. To the extent consistent with applicable law, 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. To the extent consistent with applicable law, the exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damages 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.

EPA Reg. No. 53883-264

EPA EST. NO. XXXX-XXX-XX

Control Solutions Inc.
5903 Genoa-Red Bluff
Pasadena, Texas 77507

[optional marketing claims]

CSI Chlorpyrifos CS is a liquid concentrate for use in and around (within 6 to 10 feet) the following sites:

Calf Hutches and Calving Pens and Parlors; Cargo Holds of Ships, Empty Chicken Houses, Food and Non-Food Areas of Manufacturing, Industrial Plants and Food Processing Plants; Hog Barns; Milk Rooms; Railroad Boxcars *[optional]*

CSI Chlorpyrifos CS Controls: Angoumois Grain Moths, Aphids, Ants(except carpenter, fire, harvester, and pharaoh), Bees, Beetles, Boxelder Bugs, Cadelles, Carpet Beetles, Cigarette Beetles, Clover Mites, Cluster Flies, Confused Flour Beetle, Crickets, Darkling Beetles, Dermestid Beetles, Dried Fruit Beetles, Drugstore Beetles, Earwigs, Elm Leaf Beetles, Firebrats, Flea Beetles, Flies, Gnats, Grain Mites, Indian Meal Moths, Leafhoppers, Leaf Miner, Mealworms, Mediterranean Flour Moths, Millipedes, Moths, Northern Fowl Mites, Psocids, Rod Flour Beetle, Saw-toothed Grain Beetles, Scale, Silverfish, Sowbugs, Spiders(except black widow and brown recluse), Stink Bugs, Trogoderma, and Weevils (Granary Weevils and Rice Weevils) *[optional]*

10/10

Liquid Concentrate for use in and around (within 6 to 10 feet) livestock housing, commercial buildings, industrial plants and food processing plants. [optional marketing statement]

CapVantage™ Technology [optional marketing statement, trademark name of microencapsulation technology]

(Notif for opt lang 01-07-10)