

57978-9

26-01-2010

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Georgia Anastasiou
Lewis & Harrison
c/o ISP Chemicals, LLC
122 C Street, N.W., Suite 740
Washington, D.C. 20001

JUN 01 2010

Subject: Notification to Revise Storage and Disposal Statements per PRN 2007-4
Product Name: Trimedlure and Disparlure (Racemic)
EPA Reg. No: 57978-8 and 57978-9
Your Submission Dated May 3, 2010

Dear Ms. Anastasiou:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 2007-4, dated above. A screen of the labeling revision request has been conducted for its applicability under PRN 2007-4, and it has been determined that the action request falls within the scope of this document. Our records have been duly noted, and the printed labels submitted with this application have been stamped "Notification Accepted" and will be placed in our records as current and updated. Should you have any questions regarding this action, you may contact Gina Casciano at (703) 605-0513 or via email at casciano.gina@epa.gov.

Sincerely,

Linda Hollis

Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)

**EPA**

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other: Notification

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 57978-9	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Disparlure Racemic	PM# BPPD	
5. Name and Address of Applicant (Include ZIP Code) ISP Chemicals LLC 1361 Alps Road Wayne, New Jersey 07074 PLEASE DIRECT ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <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: Notification Accepted EPA Reg. No. _____ Date: <u>6/11/10</u> Product Name <u>Reviewer: G. Casciano</u>

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>4/19/2010</u>	<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.)**Response to Letter Dated 4/19/2010****Notification per PR Notice 2007-4.**

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156, 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	
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
				<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"/> 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: Georgia Anastasiou, Lewis & Harrison 122 C Street, NW, #740, Washington, DC 20001 e-mail georgia@lewisharrison.com		Title: Agent for ISP Chemicals LLC		Telephone No. (Include Area Code): (202) 393-3903 x 19	
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 ISP Chemicals LLC			
4. Typed Name Georgia Anastasiou		5. Date 5/03/10			

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

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May 3, 2010

VIA COURIER

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard, Room S4900
2777 S. Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Linda Hollis
Biopesticide and Pollution Prevention Division

SUBJECT: ISP Chemicals LLC
Response to Letter dated 4/19/2010 for Notification per PR Notice 2007-4 for the
Following Products:
Trimedlure (EPA Reg. No. 57978-8)
Dispalure Racemic (EPA Reg. No. 57978-9)

Dear Ms. Hollis:

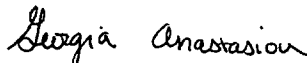
On behalf of ISP Chemicals LLC, I am responding to the denial letter dated April 19, 2010 (attached), for the notifications per PR Notice 2007-4 submitted for **Trimedlure (EPA Reg. No. 57978-8)** and **Dispalure Racemic (EPA Reg. No. 57978-9)**. As you requested, for each label I have created one label that lists the required disposal language for both size containers.

To support the notifications, enclosed please find the following documents for each product:

1. Application for Pesticide;
2. One (1) copy of the label with changes highlighted; and,
3. Two (2) copies of the label.

If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at georgia@lewisharrison.com.

Sincerely,



Georgia Anastasiou
Agent for,
ISP Chemicals LLC

cc: Nadiyah McCarroll (ISP)
Dennis Rankin (ISP)

**PRECAUTIONARY STATEMENT
HAZARD TO HUMANS AND
DOMESTIC ANIMALS**

CAUTION

Harmful if swallowed, absorbed through skin, or inhaled. Causes eye and skin irritation. Avoid contact with skin, eyes, and clothing. Avoid breathing vapor. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

FIRST AID

If Swallowed:

- Call a 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 a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

On Skin or Clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

If Inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

If in Eyes:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing the eye.
- Call a poison control center or doctor for treatment advice.

ENVIRONMENTAL HAZARDS:

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS:

Combustible. Do not use or store near heat or open flames.

SPILLS AND FIRE:

If product is released, absorb spilled material with dry inert material. Use NIOSH approved respirator, protection equipment, neoprene or rubber gloves and goggles when dealing with spills. In case of fire, extinguish with CO₂, foam or dry chemical extinguishers.

**FOR MANUFACTURING USE ONLY
FOR USE IN MANUFACTURING OR
FORMULATING REGISTERED PESTICIDE
PRODUCTS**

Not to be sold for treatment of pests. Formulators using this product are responsible for obtaining EPA registration for their formulated products.

**DISPARLURE
(Racemic)**

For manufacturing end-use products for control of the
Gypsy Moth (*Lymantria dispar*).

ACTIVE INGREDIENT:

cis-Disparlure 95%

OTHER INGREDIENTS:

(Includes < 2% trans-Disparlure)..... 5%

Total..... 100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

BEFORE USING:

See left side panel for statement of practical treatment
and precautionary statements.

See right side panel for directions for use.

LIMITATION ON WARRANTY:

To the extent allowed by the law seller's guarantee shall be limited to the terms set out on the label and, subject thereto, the buyer assumes the risk to persons or property arising from the use or handling of this product and accepts the product on that condition.

Registered and Produced By

ISP Chemicals LLC

1361 Alps Road

Wayne, New Jersey 07074

Net Content: _____ Five Gallons or Less
 _____ Greater than Five Gallons

EPA Reg. No. 57978-9

EPA Est. No. 66053-OH-001

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This product may be used to formulate end-use products if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding the support of such use(s).

FOR USE IN TRAPS AND LURES

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:

Store pesticides away from food, pet food, feed, seed, fertilizers, and veterinary supplies. Store in a well ventilated area. Protect from ignition sources. Avoid contact with high temperatures, acids, bases or prolonged contact with air. Provide means of controlling leaks or spills. Absorb spilled material in dry, inert material. Use NIOSH approved respirator, protection equipment, neoprene or rubber gloves and goggles if splashes could occur.

PESTICIDE DISPOSAL:

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

CONTAINER HANDLING:

For containers five gallons or less:

Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or in a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or mix tank or store for later use or disposal. Drain 10 seconds after the flow begins to drip. 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 incineration or, if allowed by state and local authorities, by burning or by other procedures approved by State and Local authorities. If burned, stay out of smoke.

For containers greater than five gallons:

Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) 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 back and forth ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip back and forth several times. Empty the rinsate into application equipment or 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 incineration or, if allowed by state and local authorities, by burning or by other procedures approved by State and Local authorities. If burned, stay out of smoke.

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