

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 29, 2022

Michael Foster Product Compliance Advisor The Lubrizol Corporation 29400 Lakeland Boulevard Wickliffe, OH 44092

Subject: Pesticide Registration Improvement Act (PRIA) Labeling Amendment – Expansion of the Tetraacetylethylenediamine (TAED) Tolerance Exemption at 40 CFR 180.1327 and addition of the expanded use to the Manufacturing-Use Product Lael for EPA Reg No. 59825-6 Product Name: Warwick AG610 EPA Registration Number: 59825-6 EPA Receipt Date: 12/11/2020 Action Case Number: 00146728

Dear Mr. Foster:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable under FIFRA section 3(c)(5).

You must submit and/or cite all data required for registration or registration review of your product when the U.S. Environmental Protection Agency (EPA) requires all registrants of similar products to submit such data.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Gina Burnett, of my team, via email at <u>burnett.gina@epa.gov</u>.

Sincerely,

andrew E. Buycelow

Andrew Bryceland, Team Leader Biochemical Pesticide Branch Biopesticides and Pollution Prevention Division (7511P) Office of Pesticide Programs

Enclosure

Warwick AG610

NOT TO BE USED DIRECTLY FOR TREATMENT OF PESTS FOR MANUFACTURING USE ONLY

For use in manufacturing end-use products (Bactericides/fungicides/insecticides/miticides) For disease, pest control, and plant health

ACTIVE INGREDIENT: Tetraacetyl ethylenediamine (TAED)

92.0%

8.0%

100.00%

ACCEPTED Mar 29, 2022

Under the Federal Insecticide, Fungicide

and Rodenticide Act as amended, for the

EPA Reg. No. 59825-6

INERT INGREDIENTS: TOTAL

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF ON SKIN	Take off contaminated clothing. Rinse skin with plenty of water for $15 - 20$ minutes. Call a poison control center or doctor for treatment advice.
IF IN EYES	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 further information.
IF INHALED	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth to mouth. Call a poison control center or doctor for further treatment advice.
IE SWALLOWED	Call poison control center or doctor for treatment advice. Have a 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.
Emergency phone number (24-hr provided by Chemtrec): 1-800-424-9300 (within USA) (+1) 703 527 3887	
Have the product container or label with you when calling the poison control center or	
doctor or going for treatment advice.	

[SEE [BELOW] [BACK] [SIDE] PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS]

Manufactured [by] [for]: The Lubrizol Corporation 29400 Lakeland Blvd. Wickliffe, OH 44092

EPA Registration No: 59825-6 EPA Establishment No: _____

NET Weight: [[1 kg]/[2.2 lbs]] [[25 kg]/[55.1 lbs]] [[500 kg]/[1102.3 lbs]] [[600 kg]/[1322.8 lbs]] [[1000 kg]/[2204.6 lbs]]

[Batch No. / Lot Code:]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eye or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Wear impervious or dust proof gloves, coverall and footwear with safety glasses when opening the containers or transferring material to processing equipment. Wash all contaminated clothing before reuse. Suitable respiratory equipment should be selected based on the products atmospheric concentration and the duration of exposure.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System Permit (NPDES) 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 sewage treatment plant Authority. For guidance, contact the state Water Board or Regional office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

This material is stable when dry at ambient temperatures. Reacts with acids, alkalis, and strong oxidizing agents. Reacts in aqueous solution with peroxide to form peracetic acid.

DIRECTIONS FOR USE

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

THIS PRODUCT IS TO BE USED ONLY FOR FORMULATING INTO OTHER FIFRA REGISTERED END USE PRODUCTS

General Information. Warwick AG610 is a powder form of TAED. Do not use from damaged, punctured, or unsealed containers.

Note. TAED is not a pesticide active ingredient unless it is used in aqueous solution with a second "activating" ingredient, oxygen donors such as hydrogen peroxide, percarbonates, perborates, or persulfates. The second activating ingredient must be incorporated by the formulator.

FOR MANUFACTURING USE ONLY. Not for direct treatment of pests. This product can be used to formulate end-use pesticide products for use as bactericides, fungicides, insecticides, and/or miticides on growing crops listed below. End-use products formulated from this product must be registered by the US EPA.

• Greenhouse, Nursery, Field Use, Vegetables, Row Crops, and Hydroponic Crops (In and on all food commodities, nonbearing apple trees, nonbearing fruit trees, seeds, plugs and transplants of fruiting vegetables and crucifers, ornamental and grasses). TAED and its metabolite (DAED) are exempt from the requirements of a tolerance in or on all food commodities, when used as a fungicide and bactericide in accordance with label directions and good agricultural practices (40 CFR 180.1327).

• **Turf and Landscape Use** (Turfgrass including creeping bentgrass, Kentucky bluegrass, Bermuda grass, fescue, St. Augustine, Poa annua, perennial ryegrass, other common species of golf course turfgrass).

STORAGE AND DISPOSAL

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

<u>Pesticide Storage</u> – Store in a cool, dry place away from sunlight. Avoid extremes of temperature.

<u>Pesticide Disposal</u> - Wastes resulting from use or storage of this product may be disposed of at an approved waste disposal facility. Dispose of in compliance with applicable State or Federal regulation.

Container Handling -

{For Other Non-Rigid Nonrefillable Containers}

Nonrefillable container. Do not reuse or refill this container. Completely empty container by shaking or tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Offer for recycling if available or dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

{For nonrefillable plastic containers less than or equal to 50 pounds}

Nonrefillable container. Do not reuse or refill this container. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

{For Nonrefillable Paper or Plastic Bags}

Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment, then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration.

WARRANTY: To the extent consistent with applicable law, The Lubrizol Corporation and/or its affiliates make no warranty, expressed or implied, including the warranties of merchantability and/or fitness for any particular purpose, concerning this material, except those which are contained on this label.

{Note to reviewer. Consistent with Chapter 18 section V of the label review manual. A container too small to contain all required label text may have text located on accompanying labelling. A condensed label will be affixed to the 2.2 pound package and the full label will be referenced and supplied with the 2.2 Pound package}

{Condensed 2.2 pound label}

Warwick AG610

ACTIVE INGREDIENT: Tetraacetyl ethylenediamine (TAED)..92.0%

INERT INGREDIENTS:......<u>8.0%</u> TOTAL......100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See complete product label for precautionary statements

EPA Registration No: 59825-6 EPA Establishment No: _____

NET Weight: [[1 kg]/[2.2 lbs]]

[Batch No. / Lot Code:]