

69470-19

6-28-2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Washington, D.C. 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

June 28, 2007

George Katsigras
Regulatory Affairs Specialist
Clearon Corp.
95 MacCorkle Ave. S.W.
South Charleston, WV 25303

Subject: CDB-90 Industrial Water Biocide 7 ounce Tablets
EPA Registration No. 69470-19
Application Date: June 25, 2007
Receipt Date: June 25, 2007

Dear Mr. Katsigras:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- Addition of optional marketing statements

General Comments

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Y. Henson
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL	7510P	7510P						
URN	E.Boyg	Henson						
DATE	6.28.07	6-28-07						

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CDB®-90 INDUSTRIAL WATER BIOCIDES 7 OUNCE TABLETS

{All text in brackets [xyz] is optional and may or may not be included on a final label.}
{All text in braces {xyz} is administrative and won't appear on a final label.}

{Optional marketing statements; one or more statements may be combined}

[Stabilized]
[Chlorinating tablets]
[3" tablets]
[Concentrated]
[Long lasting]
[Sanitizer]
[Slow dissolving]
[Kills bacteria and controls algae]
[Controls bacteria and algae]
[For feeder and skimmer application]
[For routine use]
[For use in automatic feeders, floaters, or skimmers]
[Individually wrapped tablets]

Active Ingredient:
Trichloro-s-triazinetriene: 99%
Inert Ingredients: 1%
Total: 100%
Available Chlorine: 90%

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER
CORROSIVE
CAUSES IRREVERSIBLE EYE DAMAGE OR SKIN BURNS
MAY BE FATAL IF INHALED
MAY BE FATAL IF ABSORBED THROUGH SKIN

Do not breathe dust or spray mists. Irritating to nose and throat. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

PHYSICAL OR CHEMICAL HAZARDS

STRONG OXIDIZING AGENT: Use only clean dry utensils. Mix only into water. Contamination with moisture, dirt, organic matter or other chemicals (including other pool chemicals) or any other foreign matter may start a chemical reaction with generation of heat, liberation of hazardous gases and possible generation of fire and explosion. Avoid any contact with flaming or burning material such as a lighted cigarette. Do not use this product in any chlorinating device which has been used with any inorganic or unstabilized chlorinating compounds (e.g., calcium hypochlorite). Such use may cause fire or explosion.

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{For Industrial uses the following statement will appear on the label.}

{For Swimming pool uses and if container is 50 pounds or less, the effluent discharge part of the following statement won't appear on the label.}

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic organisms. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or public waters unless in accordance with the requirements of a 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

EMERGENCY HANDLING: In case of contamination or decomposition do not reseal container. If possible, isolate container in open well-ventilated area. Flood with large volumes of water. Dispose of contaminated material in an approved landfill area.

KEEP OUT OF REACH OF CHILDREN DANGER

SEE PRECAUTIONARY STATEMENTS AND FIRST AID INFORMATION BELOW

FIRST AID	
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 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 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.
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.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. YOU MAY ALSO CONTACT 1-800-420-9236 FOR EMERGENCY MEDICAL TREATMENT INFORMATION.</p>	
<p>NOTE TO PHYSICIAN Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

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STORAGE AND DISPOSAL:

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

Store in a dry, cool and well-ventilated area. Avoid moisture getting into container. Keep off wet floors. In case of spillage, wash with large amounts of water. After each use, keep container tightly closed. Oxidizing material. Keep away from flames, sparks and all sources of heat. Avoid contact with organic material.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

FOR SWIMMING POOL DISINFECTANT

When used as directed, this product is effective as a swimming pool water disinfectant. The dosage necessary for your pool will change considerably depending upon those factors that burden the disinfection system. Some of the factors that will vary the required dosages are water temperature, bather load, exposure to windblown debris, thunder or rain storms and length of filtration cycle

Ensure all pool equipment is working properly. Backwash the filter system following manufacturer's directions. Adjust pH to between 7.2-7.6. Add stabilizer to establish a minimum level of 30-40 ppm to reduce degradative effects of sunlight upon the chlorine residual. (Added period) Check for metals. Before using this product, add stain and scale inhibitor to prevent staining of pool surface due to metals. When using other products as outlined in the directions for this product, always follow directions on those products.

FOR START UP OF NEWLY FILLED POOLS

Before using this product, make sure that the filtration system is clean and operating properly. Adjust the pH of the water to the range of 7.2-7.6 using suitable products and a reliable test kit. Adjust the alkalinity of the water to a minimum of 125 ppm (mg/L), based on the test kit reading.

To initially achieve 1-3 ppm available chlorine, add 1.25 oz. product per 1,000 gallons of water. Add ¼ oz. product per 1,000 gallons water daily or as needed to maintain that level.

DIRECTIONS FOR USE

With pump running, place one (1) tablet per 10,000 gallons pool water every week into a suitable feeder like a floating dispenser or directly into a skimmer basket or automatic chlorinator. Repeat additions until a residual of 1-3 ppm chlorine is established as determined by the use of a test kit. Regular use of a test kit is necessary to determine when it is necessary to add another dose of this product to maintain a residual of 1-3 ppm available chlorine in the pool water. After use of this product it is recommended that a preventative algae treatment be added on a weekly basis.

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HOW TO CALCULATE POOL CAPACITY

SHAPE OF POOL	GAL. OF WATER	(Dimensions in feet)
Rectangular	Average depth X average length X average width X 7.5	
Circular	Diameter X diameter X average depth X 5.9	
Oval with straight sides	Full width X full length X average depth X 6.7	
Irregular	Consult pool builder	

FOR SUPERCHLORINATION

The pool water should be superchlorinated or shocked every seven days or whenever the combined chlorine level is above 0.5 ppm (mg/L). Combined chlorine is the difference between total and free chlorine, as measured by a suitable test kit. Add a sufficient amount of an appropriate shock product directly to the surface of circulating water to raise the available chlorine level to 5-6 ppm (mg/L), based on test kit readings. If the combined chlorine reading is not below 0.5 ppm (mg/L), repeat the shock treatment described above. For example, the addition of 10 ounces of sodium dichloro-s-triazinetrione per 10,000 gallons of water (7.5 grams per 1,000 liters) will provide approximately 5 ppm (mg/L) of available chlorine. If the combined chlorine reading is not below 0.5 ppm (mg/L) and the water has not been restored to its normal clarity, repeat the shock treatment described above.

REENTRY

Reentry into treated swimming pools is prohibited above levels of 3 ppm of chlorine due to risk of bodily injury.

FOR USE IN INDUSTRIAL RECIRCULATING WATER COOLING TOWERS, AIR WASHERS & EVAPORATIVE CONDENSERS:

Treatment with this product is an effective way to control the growth of bacteria and algae in industrial recirculating water cooling towers, air washers and evaporative condensers. 1. Badly fouled systems should be cleaned prior to initiating treatment. 2. Initial Dosage - When the system is just noticeably fouled, add 8 oz. of this product per 10,000 gallons of water contained in the system. Repeat this dosage, if necessary, until free available chlorine level (FAC) of 0.5-1.0 ppm is obtained (as determined by use of a reliable test kit). 3. Maintenance Dosage - To obtain a FAC of 0.5 - 1.0 ppm, add 0.8-1.6 oz. of this product per 10,000 gallons of water daily or as needed. 4. This product should be added to the system at a point where adequate flow is maintained. Variations in water temperature, chlorine demand and flow rate will affect the dissolution rate. Warmer seasons may require an upward adjustment of the FAC.

Air Washers: For use only in industrial air washer systems that maintain effective mist eliminating components. Hypochlorite controls slime-forming bacteria and fungi in air washer systems. This product may be added to the system either continuously or intermittently or as needed. The frequency of feeding and duration of the treatment will depend on the severity of the problem. **BADLY FOULED SYSTEMS** should be cleaned prior to initiating treatment.

1. Initial Dosage - When the system is just noticeably fouled, add 0.4-0.5 lbs. of this product per 10,000 gallons of water contained in the system. Repeat this dosage, if necessary, until a free available chlorine level (FAC) of 0.5-1.0 ppm is obtained (as determined by use of a reliable test kit). 2. Maintenance Dosage - To maintain a FAC of 0.5-1.0 ppm, add 0.8-1.6 oz. of this product per 10,000 gallons of water, daily or as needed. 3. This product should be added to the system at a point where adequate flow is maintained. Variations in water temperature, chlorine demand and flow rate will affect the dissolution rate. Warmer seasons may require an upward adjustment of the FAC.

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**DISINFECTION OF DRINKING WATER
(EMERGENCY/PUBLIC/INDIVIDUAL SYSTEMS)**

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label and use strictly in accordance with precautionary statements and directions.

PUBLIC SYSTEM: Feed 1 ounce of this product per 9000 gallons of water until a free available chlorine residual of at least 0.2 ppm is attained throughout the distribution system. Check water frequently as prescribed by the National Interim primary Drinking Water Regulations. Contact your local Health Department for further details.

INDIVIDUAL SYSTEMS: DUG WELLS- Upon completion of the casing (lining) wash the interior of the casing (lining) with a 100 ppm available chlorine solution using a stiff brush. This solution can be made by dissolving 1 ounce of this product into 60 gallons of water. After covering the well, pour the disinfectant solution into the well through both the pipe sleeve opening and the pipeline. Wash the exterior of the pump cylinder also with the disinfectant solution. Start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours flush well until all traces of chlorine have been removed from the water. Contact your local Health Department for further details.

INDIVIDUAL WATER SYSTEMS: DRILLED, DRIVEN & BORED WELLS- Run pump until water is as free from turbidity as possible. Pour a 100 ppm available chlorine disinfecting solution into the well. This solution can be made by dissolving 1 ounce of this product into 60 gallons of water. Add 5 to 10 gallons of clean, chlorinated water to the well in order to force the disinfectant into the rock formation. Wash the exterior of pump cylinder with the disinfectant, drop pipeline into well, start pump and pump water until strong odor of chlorine in water is noted. Stop pump and wait at least 24 hours. After 24 hours flush well until all traces of chlorine have been removed from the water. Deep wells with high water levels may necessitate the use of special methods for introduction of the disinfectant into the well. Consult your local Health Department for further details.

INDIVIDUAL WATER SYSTEMS: FLOWING ARTESIAN WELLS- Artesian wells generally do not require disinfection. If analyses indicate persistent contamination the well should be disinfected. Consult your local Health Department for further details.

EMERGENCY DISINFECTION:

This product is recommended for disinfecting raw or pre-treated (settled, coagulated and/or filtered) water supplies intended for use as drinking water for humans and domestic animals.

The source of the water to be treated may be a river, lake, well, cistern or similar system. To obtain the desired disinfectant results, the water to be treated should be clear and free of dirt and organic debris. If the source of the water is cloudy and contains dirt and organic debris, the water should be held in holding tanks or ponds, treated with coagulating agents and filtered to remove the dirt and organic debris.

Dissolve 0.1 ounce of this product into 60 gallons of water (120 milligrams per 10 liters) to obtain a concentration of 10-ppm (mg/L) of available chlorine. Let the water stand for one hour before using. A residual of 1ppm (mg/L) of available chlorine, as measured by a reliable test kit, should be maintained in the water to insure disinfection.

PUBLIC WATER SYSTEMS:

RESERVOIRS: ALGAE CONTROL- Continuous chlorination is the most effective method for destroying algae, however, slug treatment can also be effective. Suitable chlorine feeding points should be selected on each stream at least 50 yards upstream from the points of entry into the reservoir. Add this product at the following rates:

Initial Dose: When the system is noticeably fouled, add this product at the rate of 1 to 5 ounces per 10,000 gallons to achieve 0.5-1.5 ppm (mg/L) available chlorine, as measured by a suitable test kit. Repeat dosage until residual is achieved.

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Subsequent Dose: When control is evident, add this product at the rate of 0.3 to 1.5 ounces per 10,000 gallons to maintain 0.2-0.5 ppm (mg/L) available chlorine, as measured by a suitable test kit.

MAINS- Thoroughly flush section to be disinfected by discharging from hydrants. Permit a water flow of at least 2.5 feet per minute to continue under pressure while injecting this product by means of chlorinator. Stop water flow when a chlorine residual test of 50 ppm is obtained at the low pressure end of the new main section after 24 hour retention time. When chlorination is completed, the system must be flushed free of all heavily chlorinated water.

NEW TANKS, BASIN, ETC.- Remove all physical soil from surface. Place 6 ounces of this product for each 10 cubic feet of moving capacity (500 ppm available chlorine). Fill to working capacity and allow to stand for at least 4 hours. Drain and flush with potable water and return to service.

NEW FILTER SAND- Apply 12 ounces of this product for each 150 to 200 cubic feet of sand. The action of the product dissolving as the water passes through the bed will aid in disinfecting the new sand.

NEW WELLS- Flush the casing with a 50 ppm available chlorine solution of water containing 0.8 ounces of this product for each 100 gallons of water. The solution should be pumped or fed by gravity into the well after thorough mixing with agitation. After 24 hours flush well until all traces of chlorine have been removed from the water. It may then be pumped until a representative raw water sample is obtained. Bacterial examination of the water will indicate whether further treatment is necessary. Contact you local Health Department for further details.

EXISTING EQUIPMENT- Remove equipment from service, thoroughly clean surfaces of all physical soil. Sanitize by placing 6 ounces of this product for each 10 cubic feet capacity (approximately 500 ppm available chlorine). Fill to working capacity and let stand at least 4 hours. Drain and place in service. If the previous treatment is not practical, surfaces may be sprayed with a solution containing 0.8 ounces of this product for each 5 gallons of water (approximately 1000 ppm available chlorine). After drying, flush with water and return to service.

EMERGENCY DISINFECTION AFTER FLOODS:

WELLS- Thoroughly flush contaminated casing with 500 ppm available chlorine solution. Prepare this solution by mixing 0.8 ounces of this product with 10 gallons of water. Backwash the well to increase yield and reduce turbidity, adding sufficient chlorinating solution to the backwash to produce a 10 ppm available chlorine residual, as determined by a chlorine test kit. After the turbidity has been reduced and the casing has been treated, add sufficient chlorinating solution to produce a 50-ppm available chlorine residual. After 24 hours, flush well until all traces of chlorine have been removed from the water. It may then be pumped until a representative raw water sample is obtained. Bacterial examination of the water will indicate whether further treatment is necessary. Retreat well if water samples are biologically unacceptable. Contact your local Health Department for further details.

RESERVOIRS- In case of contamination by overflowing streams, establish chlorinating stations upstream of the reservoir. Chlorinate the inlet water until the entire reservoir obtains a 0.2 ppm available chlorine residual, as determined by a suitable chlorine test kit. In case of contamination from surface drainage, apply sufficient product directly to the reservoir to obtain a 0.2 ppm available chlorine residual in all parts of the reservoir.

BASIN, TANKS, FLUMES, ETC.- Thoroughly clean all equipment, then apply 6 ounces of product per 10 cu. ft. of water to obtain 500 ppm available chlorine, as determined by a suitable test kit. After 24 hours drain, flush and return to service. If the previous method is not suitable, spray or flush the equipment with a solution containing 0.8 ounces of this product for each 5 gallons of water (1000 ppm available chlorine.) Allow to stand for 2 to 4 hours, flush and return to service.

FILTERS- When the sand filter needs replacement, apply 12 ounces of this product for each 150 to 200 cubic feet of sand. When the filter is severely contaminated, additional product should be distributed over the surface at the rate of 12 ounces per 20 sq. ft. Water should stand at a depth of 1 foot above the surface of the filter bed for 4 to 24 hours. When filter beds can be back-washed of mud and silt, apply 12 ounces of this product per each 50 sq. ft., allowing the water to stand at a depth of 1 foot above the filter sand. After 30 minutes, drain water to the level of the filter. After 4 to 6 hours drain, and proceed with normal back washing.

DISTRIBUTION SYSTEM- Flush repaired or replaced section with water. Establish a chlorinating station and apply sufficient product until a consistent available chlorine residual of a least 10 ppm (as measured by a chlorine test kit) remains after a 24 hour retention time.

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EMERGENCY DISINFECTION AFTER FIRES:

CROSS CONNECTIONS OR EMERGENCY CONNECTIONS- Set up a chlorine feed system near in the intake of the untreated water supply. Add 0.75 ounces of this product per 1,000 gallons of water until a chlorine residual of at least 0.2 ppm (as measured by a chlorine test kit) at the point where the untreated supply enters the regular distribution system.

EMERGENCY DISINFECTION AFTER DROUGHT:

SUPPLEMENTARY WATER SUPPLIES- A chlorine feed system should be set up on the supplementary water line. The product should be added at 0.45 ounces per 1,000 gallons until a minimum chlorine residual of 0.2 ppm (as measured by a chlorine test kit) is achieved. The water should be held for 20 minutes before use.

WATER SHIPPED IN BY TANKS, TANK CARS, ETC.- Thoroughly clean all containers and equipment. Spray a 500 ppm available chlorine solution and rinse with potable water after 5 minutes. This solution is made by mixing 0.8 ounces of this product for each 5 gallons of water. During the filling of the containers, dose with sufficient amounts of this product to provide at least a 0.2 ppm chlorine residual, as measured by a chlorine test kit.

EMERGENCY DISINFECTION AFTER MAIN BREAKS:

MAINS-Before assembly of the repair section, flush out mud and soil. Permit a water flow of at least 2.5 feet per minute to continue under pressure while injecting this product by means of chlorinator. Stop water flow when a chlorine residual test of 50 ppm is obtained at the low pressure end of the new main section after a 24 hour retention time. When chlorination is completed, the system must be flushed free of all heavily chlorinated water.

SEWAGE WASTE WATER SYSTEMS

This product is intended for the control of bacteria, fungi and algae in sewage waste water systems. This product provides rapid disinfection of primary, secondary and tertiary waste water treatment systems.

Dose Rate: Add this product at the rate of 0.02 to 0.5 pounds per 1,000 gallons (2.4 to 60 grams per 1,000 liters) in the system to achieve 0.2-3 ppm (mg/L) available chlorine, as measured by a suitable test kit, at the injection point in the disinfection contact chamber. Adjust the dose to achieve disinfection and minimize the halogen concentration at the exit of the contact chamber.

EPA REG. NO. 69470-19
EPA EST. NO. 69470-WV-2

CLEARON CORP.
95 MacCORKLE AVENUE, SW
SO. CHARLESTON, WV 25303-1411

NET WT. _____ LBS.

Made and Printed in U.S.A. 5/07 CLR

CDB® is a registered trademark of Clearon Corp.



95 MacCorkle Avenue SW
So. Charleston, WV 25303 U.S.A.
Phone: (304) 746-3000, Fax: (304) 746-3034

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June 25, 2007

Attn: Ms. Wanda Henson
Office of Pesticide Programs
Antimicrobial Division (7510P)
U.S. EPA
Arlington, VA 22202

**SUBJECT: Response to Notification application correspondence, dated June 14, 2007
CDB@-90 Industrial Water Biocide 7 ounce Tablets, EPA Reg. No. 69470-19.**

Dear Ms. Henson,

ClearOn Corporation would like to request reconsideration of your initial correspondence found that the notification application to add one of a list of optional statements was unacceptable. Our rationale for this request is based on the Agency's approval of a substantially similar product and the specific label claim ("kills bacteria") that was submitted by one of our competitors. The competitor's label claim was approved on April 5, 2007.

Please contact me at the above address or telephone me directly at 304-720-3924 should you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "George Katsigras", enclosed within a large, loopy oval scribble.

George Katsigras
Regulatory Affairs Specialist

Enclosures: EPA Form 8570-1
Correspondence from US EPA, dated June 14, 2007
Clearon's proposed label
Competitor's approved label



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

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	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 69470-19	2. EPA Product Manager E. Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CDB-90 Industrial Water Biocide 7 ounce Tablets	PM# 32	
5. Name and Address of Applicant (include ZIP Code) Clearon Corp. 95 MacCorkle Ave., S.W. South Charleston, WV 25303 <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 _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>June 14, 2007</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 date June 14, 2007. A detailed explanation is contained within the cover letter associated with this resubmission. Notification for EPA Reg. No. 69740-19: To add optional marketing statements.
 Certification Statement for Notification made per PR Notice 98-10.
 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 U.S.C. 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 <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		4. Size(s) Retail Container		5. Location of Label Directions	
<input type="checkbox"/> Label <input type="checkbox"/> Container				<input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Other _____		
<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name George Katsigras	Title Regulatory Affairs Specialist	Telephone No. (Include Area Code) 304-720-3924
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 Affairs Specialist	
4. Typed Name George Katsigras	5. Date 25-June-2007	