

70506-54

11/24/2010

10 of 6



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

United Phosphorus, Inc.
Rebecca A. Clemmer
630 Freedom Business Center
Suite 402
King of Prussia, PA 19406

NOV 24 2010


Subject: Label Notification for Pesticide Registration Notice 2007-4
Surflan 75W Manufacturing Use Product
EPA Reg. No. 70506-54
Application Dated: August 18, 2010

Dear Ms. Clemmer,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 for Surflan 75W Manufacturing Use Product (EPA Reg. No. 70506-54) dated August 18, 2010. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action requested falls within the scope of PRN 2007-4.

We have also reviewed the updates to company and emergency contact information and updated warranty and find that these actions fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at (703) 305-1243.

Sincerely,

Kathryn V. Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

2096

Please read instructions on reverse before completing form

Form Approved, OMB No. 2070-0060, Approval expires 5-31-98

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

Application for Pesticide – Section I

1. Company/Product Number 70506-54	2. EPA Product Manager Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) United Phosphorus, Inc/Surflan 75W Manufacturing Use	PM # 23	
5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 <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 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

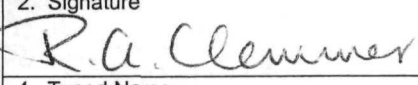
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of label changes per PR Notice 2007-4 and PR 98-10. This notification is consistent with the guidance in PRN 2007-4 and PRN 98-10 and the requirements of EPA's regulations at 40CFR§152.46, 156.10, 156.140, 156.144, 156.146, 156.156. No other changes have been made to the labeling or the CSF for 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 the amended label is not consistent with the sections above, 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 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	<input 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 <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 250 lb		5. Location of label directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product		
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Rebecca A. Clemmer	Title Regulatory Manager	Telephone No. (Include Area Code) 610-491-2828
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 Manager	
4. Typed Name Rebecca A. Clemmer	5. Date August 18, 2010	

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United Phosphorus, Inc.

630 Freedom Business Center
Suite 402
King of Prussia, PA 19406
(610) 491-2828 (phone)
(610) 491-2810 (fax)

Rebecca A. Clemmer
Regulatory Manager

August 19, 2010

Kathryn Montague (PM 23)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: Notification of Container Disposal Changes per PRN 2007-4

Dear Ms. Montague:

United Phosphorus, Inc. is providing Notification of the following changes in the labels for products listed below: container disposal wording per PRN 2007-4; updates to company and emergency contact information and updated warranty per PRN 98-10.

Products:

- Surflan 75WSP – EPA Reg. No. 70506-40
- Surflan 75W – EPA Reg. No. 70506-42
- Surflan 0.25 A.S. – EPA Reg. No. 70506-47
- Surflan 75W Manufacturing Use Product – EPA Reg. No. 70506-54

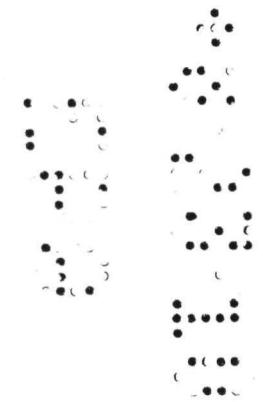
In support, for each product you will find:

- copy of the label marked to show changes
- EPA form 8570-1

Please contact me if you have any questions.

Very truly yours,

Rebecca A. Clemmer
rebecca.clemmer@uniphos.com



Surflan 75W

For Manufacturing Use Only

Active Ingredient:

oryzalin: 3,5-dinitro-
N⁴,N⁴-dipropylsulfanilamide 75%

Inert-Other Ingredients 25%
Total 100.0%

NOTIFICATION

NOV 24 2010

CAUTION

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Moderate Eye Irritation • Harmful If Absorbed Through The Skin • Prolonged or Repeated Skin Contact May Cause Skin Sensitization Reactions In Certain Individuals

Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

First Aid

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 treatment advice.

If on skin: 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.

For emergency medical assistance, call the ~~National Pesticide Information~~ Rocky Mountain Poison Control Center at 1-800-858-7378/866-673-6671. For chemical emergency: spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300.

Environmental Hazards

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other water 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 into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your state water board or regional office of the EPA.

Directions for Use

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

Only for formulation into a herbicide for the following use(s): (1) Crops including avocado, berries/small fruits, citrus, fig, kiwi, olive, pomegranate, pome fruit, stone fruit, nuts, and vineyards; (2) Ornamentals; (3) Turf; and (4) Non-cropland.



Storage and Disposal

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

Storage: Store in original container only. In case of leak or spill, use absorbent materials to contain liquids and dispose as waste.

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

Container Disposal (Fiber Drum): Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping side and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

Triple rinse [or pressure rinse] as follows:

Triple rinse: 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 back 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 and disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Do not cut or weld metal containers.

Pressure rinse: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after flow begins to drip. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

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Warranty Limitations and Disclaimer

United Phosphorus, Inc. (UPI) warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

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This is the only warranty made on this product. UPI EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

**CONDITIONS OF SALE
AND LIMITATION OF WARRANTY AND LIABILITY**

United Phosphorus, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it is reasonably fit for the purposes referred to in the Directions for use, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

To the extent allowed by applicable law, UNITED PHOSPHORUS, INC. MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND



EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. 70506-54

EPA Est. _____
Net Weight _____ lb.

Lot

United Phosphorus, Inc.
~~423 Riverview Plaza~~ 630 Freedom Business Center
~~Trenton, NJ 08611~~ King of Prussia, PA 19406
1-800-438-6071 • www.upi-usa.com

Herbicide

Rev. 8/18/10

