



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION**

June 10, 2019

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

Subject: Notification per PRN 98-10 – Revised container handling statements  
Product Name: Etho Tech  
EPA Registration Number: 70506-105  
Application Date: May 29, 2019  
Decision Number: 551659

Dear Ms. Clemmer:

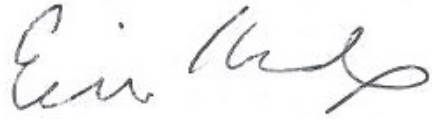
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements 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 Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, you may contact please contact BeWanda Alexander at (703)347-0313 or by email at [alexander.bewanda@epa.gov](mailto:alexander.bewanda@epa.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Erik Kraft", with a stylized flourish at the end.

Erik Kraft, Product Manager 24  
Fungicide and Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

**NOTIFICATION**

70506-105

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

06/10/2019

**Etho Tech****FOR USE IN FORMULATING HERBICIDES ONLY**

|  |        |
|--|--------|
| <b>ACTIVE INGREDIENT:</b> Ethofumesate (2-ethoxy-2,3-dihydro-3,3-dimethyl-5-benzofuranyl methanesulfonate) ..... | 98.0%  |
| <b>OTHER INGREDIENTS:</b> .....  | 2.0%   |
| Total  | 100.0% |

**KEEP OUT OF REACH OF CHILDREN****CAUTION****FIRST AID**

**IF SWALLOWED:** Call a poison control center or doctor immediately 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

**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 eyes. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of soap and 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.

For emergency medical assistance, contact the Rocky Mountain Poison Control and Drug Center at 1-866-673-6671.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call  
CHEMTREC 1-800-424-9300

United Phosphorus, Inc.  
630 Freedom Business Center  
King of Prussia, PA 19406  
1-800-438-6071 [www.upi-usa.com](http://www.upi-usa.com)

EPA Reg. No. 70506-105  
EPA Est. No

Net Weight: XX lbs (XX KG)

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**CAUTION**

Harmful if swallowed. Avoid inhalation of dust. Do not get in eyes, on skin or on clothing. Wear rubber gloves when handling. Wash thoroughly before eating, drinking or smoking and at the end of each day's operation.

**ENVIRONMENTAL HAZARDS**

This pesticide product is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans or other 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 local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency. Do not contaminate water when disposing of equipment washwaters or rinsate.

**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 an herbicide for:

- 1) The following uses: sugar beets, grass seed, commercial sod, and ornamental turf;
- 2) Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and,
- 3) Uses for experimental purposes that are in compliance with USEPA requirements.

**Formulation Information**

Each formulator is responsible for obtaining EPA registration for his own end use products. Technical information on formulations of this product as well as its physical and chemical characteristics may be obtained from United Phosphorus, Inc.

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in original container tightly closed and in a safe place.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER ~~DISPOSAL~~HANDLING:**

*(container handling for rigid containers greater than 5 pounds)*

Nonrefillable container. Do not reuse or refill this container. Clean promptly after emptying. Triple rinse or pressure rinse as follows.

Triple rinse: Empty the remaining contents into application equipment or a mix tank. Fill the container  $\frac{1}{4}$  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.

(container handling for container with liner)

Container Handling: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. Offer the drum for recycling, if available.

(container handling for bags)

Container Handling: Nonrefillable container. Do not reuse or refill this container.

Completely empty bag into processing equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

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. EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES 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.