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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DEC 18 2009

Mr. David Olson
Director, Regulatory Affairs
United Phosphorus, Inc.
630 Freedom Business Center
King of Prussia, PA 19406

Subject: Label Notifications for Pesticide Registration Notice 2007-4

Dear Mr. Olson,

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated August 26, 2009 for the following products:

**TPTH Technical
Super Tin[®] 80WP**

**(EPA Registration Number 70506-198)
(EPA Registration Number 70506-214)**

The Registration Division (RD) has conducted its review of these requests for their applicability under PRN 2007-4 and finds that the label changes requested fall within the scope of PRN 2007-4. The labels submitted with the applications have been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please call me directly at 703-305-6249 or Steve Schaible of my staff at 703-308-9362.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington", is located below the word "Sincerely,".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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**EPA**

United States
Environmental Protection Agency
 Washington, DC 20460

☐ **Registration**
☐ **Amendment**
☒ **Other:**

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70506-198	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) United Phosphorus Inc./TPTH Technical	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	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 _____	
<input type="checkbox"/> Check if this is a new address		

Section - II**NOTIFICATION****DEC 18 2009**

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☒ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application
☐ Other - Explain below

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

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 statement 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:			
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	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other Fabric Super Sack
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1200 lbs	5. Location of Label Directions <input checked="" 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 checked="" 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 David L. Olson	Title Director, Regulatory Affairs	Telephone No. (include Area Code) 610-491-2814	
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) <div style="border: 1px solid black; padding: 5px; text-align: center;"> DEC 18 2009 </div>
2. Signature 	3. Title Director, Regulatory Affairs		
4. Typed Name David L. Olson	5. Date 8/26/09		



United Phosphorus, Inc.

630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
(610) 491-2814 (phone)
(610) 491-2810 (fax)

August 26, 2009

VIA: United Parcel Service

Document Processing Desk (NOTIF)
Linda Arrington
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Notification Regarding PR Notices 2007-4

TPTH Technical
Vendex Technical Miticide
Vendex 50 WP
Super Tin 4L
Super Tin 80 WP

EPA Reg. No. 70506-198
EPA Reg. No. 70506-210
EPA Reg. No. 70506-211
EPA Reg. No. 70506-212
EPA Reg. No. 70506-214

Dear Ms. Arrington:

United Phosphorus, Inc. hereby notifies the Agency of our intent to revise the subject labels for our registered pesticide products containing the active ingredients TPTH and Fenbutatin-oxide.

These label notifications have to do with revision of the Storage and Disposal text in order to comply with the requirements of PR Notice 2007-4 regarding Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment."

The changes are consistent with the notification provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46. Enclosed please find the following materials to support these registration notifications:

1. Completed Applications for Pesticide Registration (EPA Form 8570-1)
2. Copies of the revised labels
3. CD with the labels in electronic format (file names: 070506-00198.20090826.pdf, 070506-00210.20090826.pdf, 070506-00211.20090826.pdf, 070506-00212.20090826.pdf, and 070506-00214.20090826.pdf)
4. Completed Certification with Respect to Label Integrity form

If you have any questions on this submission please call me at 610-491-2814 or email at dave.olson@uniphos.com.

Sincerely,

David L. Olson
David L. Olson
Director, Regulatory Affairs

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NOTIFICATION

DEC 18 2009



TPTH TECHNICAL



ACTIVE INGREDIENT: (% by weight) Triphenyltin hydroxide	96.0%
OTHER INGREDIENTS	4.0%
TOTAL	100.0%



KEEP OUT OF REACH OF CHILDREN
DANGER POISON



FIRST AID:

IF SWALLOWED: Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Call a physician or Poison Control Center.

IF ON SKIN: Wash with plenty of soap and water.

IF IN EYES: Flush with plenty of water. Call a physician.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

EPA Registration No. 70506-198

- ☐ EPA Establishment No. 5905-AR-1
- ☐ EPA Establishment No. 005204-KY-001
- ☐ EPA Establishment No. 041133-HL-001
- ☐ EPA Establishment No. 072036-CHN-001

Net Contents _____

United Phosphorus, Inc.

630 Freedom Business Center, Suite 402

King of Prussia, PA 19406

1-800-438-6071 • www.upi-usa.com

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FOR FORMULATION INTO END-USE FUNGICIDE PRODUCTS INTENDED FOR USE ON PECAN TREES, PEANUTS, CARROTS, POTATOES, SUGAR BEETS OR INSECTICIDE PRODUCTS INTENDED FOR USE AS SPIDER MITE SUPPRESSANTS.

LABEL AND TECHNICAL INFORMATION: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Labeling of products formulated from TPTH Technical must conform to the Registration Standard on Triphenyltin Hydroxide and any other regulations that may issue. For up-to-date information, contact United Phosphorus, Inc. or the Environmental Protection Agency. Any variance from the federally registered labeling for products containing TPTH Technical will have to be supported by data provided by the formulator.

Detailed information on chemical and physical properties and other formulation recommendations for TPTH Technical are available from the Regulatory Affairs Department at United Phosphorus, Inc. Obtain this information before undertaking the formulation of TPTH Technical in order to avoid formulation hazards and insure a satisfactory finished product.

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

FATAL IF INHALED. CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE. MAY BE HARMFUL OR FATAL IF SWALLOWED OR ABSORBED THROUGH THE SKIN. DO NOT GET IN EYES, OR ON SKIN. DO NOT BREATHE DUST, VAPOR OR SPRAY MIST. When handling either products containing TPTH or spray-diluted mixtures, wear protective clothing (long pants, long sleeve shirt, impermeable gloves, hat, boots and a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health). When handling the concentrated products, wear a face shield. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse. Do not enter treated areas for at least 24 hours after treatment. The United States Environmental Protection Agency has determined that triphenyltin hydroxide causes birth defects in laboratory animals. Exposure to triphenyltin hydroxide during pregnancy should be avoided.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not discharge into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in a NPDES permit. 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 TELEPHONE NUMBERS:

CHEMTREC: (800) 424-9300

MEDICAL: (866) 673-6671 Rocky Mountain Poison Control Center

STORAGE AND DISPOSAL

STORAGE INSTRUCTIONS: Do not contaminate water, food or feed by storage or 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.

Do not use or store near heat or open flame. Store in a locked area away from food, feed or fertilizer. If container is damaged or leaking, contact United Phosphorus, Inc. for specific instructions.

PESTICIDE DISPOSAL INSTRUCTIONS: 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 HANDLING: 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, or by other procedures allowed by state and local authorities.

IMPORTANT INFORMATION READ BEFORE USING PRODUCT

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product reflect the opinion of experts based on field use and tests, and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of United Phosphorus, Inc. or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of United Phosphorus, Inc. and Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold United Phosphorus, Inc. and Seller harmless for any claims relating to such factors.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UNITED PHOSPHORUS, INC. AND SELLER MAKE NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ON THIS LABEL.

To the extent consistent with applicable law, United Phosphorus, Inc. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product and **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF UNITED PHOSPHORUS, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF UNITED PHOSPHORUS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

United Phosphorus, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by the duly authorized representative of United Phosphorus, Inc.

70506-198(080609-3528)