

72680-1

7-10-2002

1/4

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0080, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 72680-1	2. EPA Product Manager JAMES A TOMPKINS	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) VINE-X	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) UPM CORPORATION 28 GARRETT AVENUE ROSEMONT, PA 19010 <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 _____ "Me Too" Application.
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated JUNE 11, 2002	<input type="checkbox"/> Other - Explain below.
<input type="checkbox"/> Notification - Explain below.	

NOTIFICATION

JUL 10 2002

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

RESUBMIT NOTIFICATION (ORIGINALLY SUBMITTED MAY 30, 2002) WITH CERTIFICATION STATEMENT, PER LETTER DATED JUNE 11, 2002, FROM JAYCE M EDWARDS, NOTIFICATIONS REVIEW.

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
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued 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 ALBERTO R QUISUMBING, PhD	Title CONSULTANT TECHNICAL AFFAIRS	Telephone (N.J. (Include Area Code)) (610) 525-6561
2. Signature 		3. Title PRESIDENT
4. Typed Name ARTHUR M TOTFANI, JR.		5. Date JUNE 18, 2002
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)

UPM Corporation

28 Garrett Avenue - Rosemont, PA 19010
Phone: 610-525-6561 Fax: 610-525-6562

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RESUBMITTED

May 30, 2002

Attn: Mr. James A. Tompkins (PM 25)
OPP, Registration Division 7505-C
U. S. Environmental Protection Agency
Crystal Mail, Bldg. 2, Room 266
1921 Jefferson Davis Highway
Arlington, VA 22202

Subject: Vine-X Vine & Brush Control (EPA Reg. No. 72680-1)
Removal of "Professional Strength" phrase from Vine-X box label
Notification/Response of EPA Letter dated March 13, 2002

NOTIFICATION

JUL 10 2002

Dear Mr. Tompkins:

Per our telephone conversation and your letter dated March 13, 2002 (attached), we are submitting a completed EPA Form 8570-1 notifying the Agency that we have amended our Vine-X product label by removing the phrase, "PROFESSIONAL STRENGTH", from the box labeling where it appears.

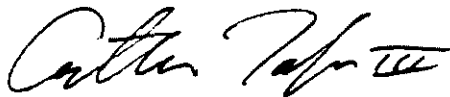
In the enclosed amended label, which now conforms with PR Notice 91-07, the phrase, PROFESSIONAL STRENGTH, has been removed from the marketing claim/statement located below the picture on the box labeling. The latter is the only place where the phrase appears on our label.

For your information, we expect to order boxes with the amended labeling by Fall 2002.

Thank you very much for your kind attention to this matter. If there are any questions, please contact me at (610) 525-6561.

Sincerely,

UPM Corporation



Arthur M. Tofani III
Vice President

Encl. EPA letter dated March 13, 2002
EPA Form 8570-1/Notification
One revised label ("Professional Strength" deleted)

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Keep Out Of Reach Of Children

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed wear long-sleeved shirt and long pants, shoes and socks. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash hands before eating, drinking, chewing gum, or using the toilet.

First Aid

If swallowed: Call a 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 by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothes: 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.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

Note to Physicians: Probable mucosal damage may contraindicate the use of gastric lavage. You may call 1-800-885-8888 for emergency medical treatment information.

Environmental Hazards

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to treated areas before the main-rain water runs. Do not contaminate water when cleaning equipment or disposing of equipment washwater.

Physical or Chemical Hazards

Corrosivity: Do not store or use near heat or open flame. Do not smoke when using this product. Do not sip or store with food, feeds, drugs, or clothing.

Storage and Disposal

Do not contaminate water, food, or feeds by storage or disposal. Open dumping is prohibited. Spillage: Store container upright, above 25°F, or replace before use. Keep out of reach of children in a cool, dry area away from heat or open flame, with valve closed and overcap securely screwed down. Keep brush and valve stem clean. Clean product if exposed to heat, damaged, or otherwise unacceptable. Discard if bottle is damaged in any way. Do not attempt to remove applicator or refill bottle.

Container Disposal: Dispose of empty container and cleaning materials in a secure trash receptacle. Do not contaminate water, food, or feeds by disposal.

DISCLAIMER

When used in strict accordance with the manufacturer's specifications, this product is reasonably fit for the purposes stated on the label. No other express or implied warranty of merchantability or fitness for a particular purpose or any other express or implied warranty is made herein. The manufacturer, distributor, and licensed representatives of the product may not be held liable for damage or injury caused by misuse of the product, either accidental or deliberate. Purchaser assumes all responsibility for the proper use of this product after sale.

Registered for UPM Corporation, 28 Germ Ave, Research, PA 19071, U.S. Patent Pending, EPA Reg. No. 7288-1, EPA Est. 571625-AB-001

WOODY PLANTS & VINES CONTROLLED

Vine-X will control most common invasive vine & brush species including Ailanthus, Ash, Birch, Blackberry, Box Elder, Brazilian Pepper, Choke Cherry, Cottonwood, Elderberry, Elm, Honeylocust, Kudzu, Locust, Mesquite, Mimosa, Oak, Perseemon, Poison Ivy, Poison Oak, Raspberry, Sassafras, Sweet Gum, Trumpet Creeper, Virginia Creeper, Wild Grape, Wild Rose, and more. See insert inside box for more extensive species controlled list.

RECOMMENDED COVERAGE AREA

Individual circumstances will vary, but under typical residential garden situations one (1) 12 oz. bottle of Vine-X is recommended to control vines & brush over approximately 1/2 to 1 full acre of ground.

A CONSTANT PROBLEM

Nuisance vines and brush pests reoccur a constant threat to a well-tended garden. When these weeds take root near valuable ornamental & vegetable plants, the problem can become even more difficult to handle. Spraying with conventional herbicides kills damage and injury to desirable flowers & shrubs through overspray, misting, and dripping, and may release an unnecessary amount of chemicals into your garden, while cutting them back simply encourages their already aggressive pattern of growth. When situations like these arise, gardeners require a product specifically designed to resolve the problem without creating any new ones.

THE VINE-X SOLUTION

Used for years by vegetation control professionals, the herbicide in Vine-X is different from any other now in use. Unlike typical water-based sprays which must be applied over large areas of foliage to work effectively, Vine-X's unique herbicide is formulated in a special vegetable oil base which actually penetrates the water-proof outer layer of the bark of undesirable vines & brush pests. This means that it is no longer necessary to cover valuable plants or stems to protect them from overspraying or dripping, nor is it required to cut or scrape the stems or trunks of every unwanted plant in order to make an effective application.

ZERO WASTE - MONEY SAVED

Because Vine-X is applied by contact directly to the stem of a problem plant, virtually no product is lost through airborne transmission, while all sprays and fumigants waste some of their contents even when used properly. With Vine-X, all you see is what you need, no more. And that's all you pay for.

YEAR-ROUND USE

Vine-X's multi-seasonal use capability means that problem plants may be targeted even before foliage appears! This makes them much easier to find and treat, and avoids the risk of contact with toxic leaves of species like poison ivy and poison oak.

FOR MORE INFORMATION

To obtain more information about Vine-X including Minnesota Safety Data Sheet, Frequently Asked Questions, extended species controlled list, and more, please visit our website at: www.vine-x.com



A ready-to-use herbicide for the control of vines, brush, and woody plants wherever spraying is not practical.

SPECIAL FEATURES:

- Penetrating formula goes right through bark!
• No risk to garden plants from overspray or mist!
• Multi-seasonal - use at almost ANY time of year!
• No wasted product - better VALUE than sprays!

Table with 2 columns: Active Ingredient, Inert Ingredients, Total. Values: 3,5,6-trichloro-2-pyridylmethyl carbamate 13.9%, Inert ingredients 86.1%, Total 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION. See box panels for directions and precautionary statements. NET CONTENTS: 12 FL. OZ.

NOTIFICATION JUL 10 2002

THE VINE-X ADVANTAGES

Here are just some of the features that give Vine-X the clear advantage when compared with other products often used for the same purpose:

Comparison table between Vine-X, water-based concentrates, and water-based sprays across categories: Ester-type active ingredient, Flash-penetrating formula, Pre-filling application, No stem cutting, Least product wasted in use.

*Pressure not applicable to this product type. For best value, always select the right product for the right task. For invasive vines & brush in narrow-spray places, use the same formula that professionals have used for years: new Vine-X.

DIRECTIONS FOR USE

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

Read all Directions for Use carefully before applying.

To help avoid skin contact, wear non-porous rubber gloves when using this product or handling treated plants.

Do not apply this product in a way that will contact any person or animal.

Hold bottle upright and away from face. Unscrew overcap and lift straight up to remove. Lift valve disk so to open, apply brush to area of stem or trunk nearest to ground, then squeeze bottle gently to start flow. Glide along in a steady motion to cover at least 6" to 12" of main stem or trunk up to 1/2 inch in diameter, and 6" more for every additional half inch in diameter. Wet bark thoroughly, but not to the point of runoff. Apply all the way around stem if possible, and treat all excises and cracks. Keep children and animals away during use. Avoid rubbing or scrubbing applicator brush against plant stem. Keep bottle upright at all times, except when applying. Do not squeeze bottle excessively, and take care not to allow contents to cut off or drip onto ground or other plants. If dripping or contact occurs, isolate and remove affected area immediately. Product may be applied to cut stems, but do not allow to dry. Avoid contact with skin, eyes, or clothing. If such contact occurs, follow instructions under First Aid on label. After treatment, hold bottle upright. Press valve stem all the way down to close, and wipe excess from applicator by brushing against stem or trunk. Keep applicator and valve stem clean. Replace overcap securely. Wash hands with soap and water after using the product or handling treated plants. See insert inside box for additional information.



NOTE: PROFESSIONAL STRENGTH has been deleted.

UPM Corporation

28 Garrett Avenue - Rosemont, PA 19010
Phone: 610-525-6561 Fax: 610-525-6562

June 18, 2002

Ms. Joyce M. Edwards
Notifications Review Coordinator
Registration Division (7505C)
U. S. Environmental Protection Agency
Crystal Mall, Building 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Subject: Vine-X Vine & Brush Control (EPA Reg. No. 72680-1)
Removal of "Professional Strength" phrase from Vine-X box label
Certification for Notification Letter to EPA dated May 30, 2002

Dear Ms. Edwards:

Per your letter dated June 11, 2002 (attached for your convenience), we are resubmitting our notification together with the certification statement, required per PR Notice 98-10, which was inadvertently omitted from our mailing of the notification submission on May 30, 2002.

The labeling was amended to conform it to PR Notice 91-7. No changes were made other than what was described in the notification. The required certification is printed below:

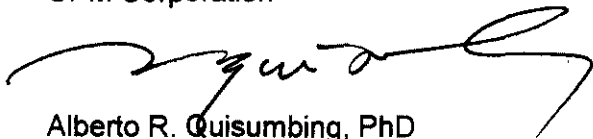
NOTIFICATION SUBMISSION CERTIFICATION

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.

Thank you very much for your kind attention to this matter. If there are any questions, please contact me at (610) 525-6561.

Respectfully yours,

UPM Corporation



Alberto R. Quisumbing, PhD
Consultant, Technical Affairs

NOTIFICATION

JUL 10 2002

Encl. EPA Form 8570-1/Response to EPA letter of June 11, 2002.
EPA Form 8570-1/Notification (resubmitted)