

72787-1

12/22/2009

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Cellulose Technologies Group, Inc.
c/o James S. Damico
SciReg, Inc.
12733 Director's Loop
Woodbridge, VA 22192

DEC 22 2009

Subject: Notification to make minor label changes
EPA Reg. No.:72787-1
Date of Registrant Submission: December 17, 2009

Dear Mr. Damico:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN)98-10 dated December 17, 2009, for the abovementioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested 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 regarding this letter, please contact Samantha Hulkower at (703) 603-0683 or Hulkower.Samantha@epa.gov.

Sincerely,

Kimberly Nesci
Product Manager 11
Insecticide Branch
Registration Division (7505P)

Enclosures: Copy of Label Stamped "Notification"

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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

Application for Pesticide - Section I

1. Company/Product Number 72787-1	2. EPA Product Manager K. Nesci	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) TAP Insulation	PM# 11	
5. Name and Address of Applicant (Include ZIP Code) Cellulose Technologies Group, Inc. 18332 Hideaway Road Charlotte, NC 28278-8610 <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 minor label changes.

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:			
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	2. Type of Container <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 <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On label. <input type="checkbox"/> On label accompanying product.	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input 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 James S. Damico	Title Agent (SciReg, Inc.)	Telephone No. (Include Area Code) 703/494-6500
Certification I certify that the statements which 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 Agent (SciReg, Inc.)	
4. Typed Name James S. Damico	5. Date 12/17/09	

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SciReg, Inc.
Science and Regulatory Consultants

December 17, 2009

Kimberly Nesci
Product Manager, Team 11
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re: Notification; minor label changes
- T•A•P Insulation (EPA Reg. No. 72787-1)

Dear Ms. Nesci:


On behalf of our client, Cellulose Technologies Group, Inc. (CTG), SciReg, Inc. is submitting this notification to make minor changes to the product label for T•A•P Insulation (EPA Reg. No. 72787-1). Six copies of the label are included with this submittal, one of which is clearly marked to show the changes. Further, the label changes are outlined below:

1. Page 3: Changed "AVG. NET CONTENTS" to "MIN. NET WT."
2. Page 4: Changed contact telephone number from "888-8-BUGS-OUT" to "1-866-BUG-PCIS."
3. Page 6: Added an additional alternative insulation coverage chart.
4. Page 7: Added the following text to the attic card statements: "STATEMENT OF COMPLIANCE FOR LOOSE FILL INSULATION:"

CTG and SciReg strongly believe that none of the label changes addressed herein require notification to the Agency; that is, we feel all the changes qualify as "non-notifications" under EPA PR Notice 98-10. Nevertheless, per your request, and in the interest of completeness and clarity, we are making this notification.

If you should have any questions regarding the label, please contact me directly.

Sincerely,



James S. Damico
President

T•A•P™

Thermal, Acoustical, and Pest Control Insulation
3 - insulations - in - 1
INSULATION MADE FROM RECYCLED PAPER

NOTIFICATION

DEC 22 2009

ACTIVE INGREDIENT:

Orthoboric acid.....	12.5%
OTHER INGREDIENTS.....	87.5%
TOTAL.....	100.0%

- Helps protect your home environment from annoying insects and other arthropods*
- Contains 87% recycled paper
- Helps keep you warm in winter & cool in summer
- Permanently guards against flame spread
- Highly resistant to air-infiltration
- Helps deaden sound as an acoustical barrier
- This clean-blowing insulation is the result of a patented process.

FOR USE IN NEW CONSTRUCTION AND RETROFIT APPLICATIONS

- ATTICS • FLOORS • WALLS • CRAWLSPACES •
- OVERLAY FIBER GLASS OR OTHER INSULATIONS •

- HOMES
- APARTMENTS & CONDOMINIUMS
- OFFICES & INDUSTRIAL BUILDINGS
- HOTELS & MOTELS
- HOSPITALS & NURSING HOMES
- RESTAURANTS
- SCHOOLS

KEEP OUT OF THE REACH OF CHILDREN
CAUTION

FIRST AID

IF ON SKIN or CLOTHING:

- 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 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.
- 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 when going for treatment.

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PRECAUTIONARY STATEMENTS:
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE)

Applicators, mixers, and other handlers must wear:

- long-sleeved shirt
- long pants
- socks, shoes
- chemical-resistant gloves
- dust mask or protective respirator
- dust goggles

READY-TO-USE T•A•P™ *Thermal, Acoustical, and Pest Control Insulation* is a ready-to-use insect and other arthropod control insulation. This product is toxic to listed insects and other arthropods and is intended to prevent their infestations in those building voids (attic, wall, between-floors, crawlspace) where the product is applied. Its toxic effect begins only after insect/arthropod contact with the product.

KILLS

Cockroaches, Termites (including Formosan Termites), Ants, Silverfish, Earwigs, Crickets, Sowbugs, Darkling Beetles, Millipedes, Centipedes, and Booklice.

This insulation contains material toxic to these insects/arthropods and is intended to prevent new infestations in walls and attics where the product is applied. Control of insects/arthropods is limited to contact with insulation.

DIRECTIONS FOR USE

It is a violation of Federal law to apply this product in a manner inconsistent with its labeling. "R" means resistance to heat flow. The higher the **R-value** the greater the insulating power. To get the marked **R-value**, it is essential that this insulation be installed properly. Insulation applicators installing this material should be familiar with and carefully follow installation instructions from the manufacturer.

NOT FOR USE AS SOLE PROTECTION AGAINST TERMITES. Use of this product does not substitute for pre- and/or post-construction mechanical alteration, soil treatment or foundation treatment. For active termite infestations, you should consult a licensed pest control operator.

EASY AS 1 • 2 • 3

Attic Preparation:

- Maintain attic ventilation. Insulation should not cover any attic ventilation. Use baffles or vent chutes. Do not cover soffit vents.

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- Insulation should not cover or touch heat producing components like light fixtures. Create barriers to maintain a 3" clearance.
 - Create a barrier around you attic access to keep the insulation in place when entering or exiting the attic.

FOLLOW INSTRUCTIONS FOR SET UP AND OPERATION OF BLOWING MACHINE
[Graphics accompany items 1 – 3 below]

1. Position Blowing Machine outside house. Plug in and attach 100' hose. (Coloque la máquina desopleado fuera de la casa, enchúfela y sujete una manguera de 100'.)
2. Run hose to attic through nearest access. Avoid tight turns. (Extienda la manguera hasta el ático a través del acceso más cercano. Evite curvaturas cerradas.)
3. Blow insulation into attic or on top of existing insulation to desired thickness/R-Value. (Sople el aislamiento en el ático al espesor Valor R deseado.)

TO HELP AVOID FIRE: Keep insulation at least three inches away from the sides of recessed light fixtures. Do not place insulation over such fixtures so as to entrap heat. Also keep insulation away from exhaust flues of furnaces, water heaters, space heaters or other heat-producing devices. To be sure that insulation is kept away from light fixtures and flues, use a barrier to permanently maintain clearance around these items. Do not install where temperatures may exceed 180°F. Check with local building or fire officials for guidance on installation and barrier requirements.

¡Precaución! TAPARA PREVENTIR INCENDIOS: Guarde el aislante por lo menos tres pulgadas de distancia de las instalaciones de luz a menos que sean IC del tipo clasificado para el contacto con el aislante. Guarde el aislante lejos de los escapes de tubos de los boilers, hornos, calentadores u otros aparatos de calefacción a menos que el dispositivo se clasificado para "0" separaciones a los aparatos de calefacción. Para asegurarse que el material mantenga lejos de estos, utilice una barrera para mantener un espacio permanente alrededor de estos objetos. Consulte oficiales locales de construcción y del departamento de bomberos para información sobre instalación y requisitos.

REQUEST TO INSTALLER: Remove bag label and give it to consumer and/or affix in building at completion of job.

SOLICITUD AL INSTALADOR: Al terminar de la instalación, remueve y entregue esta etiqueta al consumidor.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **If empty:** Do not reuse or refill this container. Place in trash or offer for recycling if available. **If partly filled:** call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

MIN. NET WT.: ___ lbs [kg]

* effective against listed organisms

Manufactured by Cellulose Technologies Group, Inc.
18332 Hideaway Rd., Charlotte, NC 28278-8610
Tel: 1-866-BUG-PCIS
www.TAPinsulation.com
US Patent Number 6,578,782
EPA REG. NO. 72787-1

EPA EST. NO.

Bloomer, WI 54724	EPA EST. No. 72787-WI-001
Hickory, KY 42051	EPA EST. No. 73840-KY-001
Webberville, MI 48892	EPA EST. No. 73854-MI-001
Chambersburg, PA 17201	EPA EST. No. 73864-PA-001
Cornelia, Georgia 30531	EPA EST. No. 73744-GA-001
Monroe, LA 71202	EPA EST. No. 73755-LA-001
Houston, TX 77241	EPA EST. No. 75642-TX-001
Chandler, AZ 85225	EPA EST. No. 85233-AZ-001

ADDITIONAL MARKETING CLAIMS AND GRAPHICS

Commercial Size

Save Energy and Money!

- Helps Keep Bugs Out* & Comfort In!
- Easy Blow In Attic Insulation
- Resists Mold
- Itch Free Insulation – No Cutting

For your Tax Credit of up to \$500 visit www.TAPinsulation.com

[Energy Star Graphic]

[Recycle Symbol]

[PC Barcode]

MADE IN U.S.A

INSULATION INDUSTRY STANDARD INFORMATION

From R-13 To R-49 or higher

Covers up to 63 SQ FT [23 lb bag]

Covers up to 83 SQ FT [30 lb bag]

[ALTERNATIVE COVERAGE CHART 1]

ATTIC	TAP COVERAGE CHART (23 lb bag)				
	R-VALUE	INSTALLED THICKNESS	COVERAGE SF/BAG	BAGS PER 1000 SF	WEIGHT LBS/SF
	11	3.0	64.3	14.7	0.36
	13	3.5	54.4	17.4	0.42
	19	5.1	37.2	25.4	0.62
	24	6.5	29.5	32.1	0.78
	26	7.0	27.2	34.8	.085
	30	8.1	23.5	40.2	0.98
	32	8.6	22.1	42.8	1.04
	38	10.3	18.6	50.9	1.24
40	10.8	17.7	53.5	1.3	

This bag covers 37.2 sq ft @ R-19 where framing is 2"x 6" & 16" OC

[ALTERNATIVE COVERAGE CHART 2]

ATTIC	TAP COVERAGE CHART (30 lb bag)				
	R-VALUE	INSTALLED THICKNESS	COVERAGE SF/BAG	BAGS PER 1000 SF	WEIGHT LBS/SF
	11	3.0	83.5	12.0	0.36
	13	3.5	70.7	14.2	0.42
	19	5.1	48.3	20.7	0.62
	24	6.5	38.3	26.1	0.78
	26	7.0	35.3	28.3	.085
	30	8.1	30.6	32.7	0.98
	32	8.6	28.7	34.8	1.04
	38	10.3	24.2	41.4	1.24
40	10.8	23.0	43.5	1.3	

This bag covers 48.3 sq ft @ R-19 where framing is 2"x 6" & 16" OC

[ALTERNATIVE COVERAGE CHART 3]

R-Value @ 75°F	Initial Installed Thickness (in.)	Minimum Settled Thickness (in.)	Bags/ 1,000 Sq. Ft. 2"x6" Joists 16" On Ctr.	Net Coverage Sq. Ft./ Bag	Bags/ 1,000 Sq. Ft. 2"x6" Joists 24" On Ctr.	Net Coverage Sq. Ft. / Bag	Bags/ 1,000 Sq. Ft. No Joists	Net Coverage Sq. Ft. / Bag	Minimum Weight Per Sq. Ft. (Lbs.)
10	3.0	2.7	10.5	95.4	10.8	92.3	11.6	86.5	0.35
11	3.3	3.0	11.5	86.7	11.9	84.0	12.7	78.6	0.38
12	3.6	3.2	12.6	79.5	13.0	77.0	13.9	72.1	0.42
13	3.9	3.5	13.6	73.4	14.1	71.0	15.0	66.5	0.45
19	5.8	5.1	19.9	50.2	20.6	48.6	22.0	45.5	0.66
20	6.1	5.4	21.0	47.7	21.7	46.2	23.1	43.2	0.69
22	6.7	5.9	23.4	42.7	24.1	41.5	25.4	39.3	0.76
24	7.3	6.5	25.7	38.8	26.4	37.9	27.7	36.0	0.83
28	8.5	7.6	30.4	32.9	31.0	32.2	32.4	30.9	0.97
30	9.1	8.1	32.7	30.6	33.3	30.0	34.7	28.8	1.04
32	9.7	8.6	35.0	28.6	35.7	28.1	37.0	27.0	1.11
35	10.6	9.5	38.5	26.0	39.1	25.6	40.5	24.7	1.21
36	10.9	9.7	39.6	25.2	40.3	24.8	41.6	24.0	1.25
38	11.5	10.3	41.9	23.8	42.6	23.5	43.9	22.8	1.32
40	12.1	10.8	44.2	22.6	44.9	22.3	46.2	21.6	1.39
44	13.3	11.9	48.9	20.5	49.5	20.2	50.9	19.7	1.53
48	14.5	13.0	53.5	18.7	54.1	18.5	55.5	18.0	1.66
49	14.8	13.2	54.6	18.3	55.3	18.1	56.7	17.7	1.70
50	15.1	13.5	55.8	17.9	56.5	17.7	57.8	17.3	1.73
54	16.3	14.6	60.4	16.5	61.1	16.4	62.4	16.0	1.87
60	18.2	16.2	67.4	14.8	68.0	14.7	69.4	14.4	2.08

This bag covers 50.2 sq ft @ R-19 where framing is 2"x 6" & 16" OC

The listed values are based on settled thickness and can be obtained only by an insulation applicator using equipment supplied by the manufacturer and specifically designed for the product and application techniques.

R-Value (@ 4") 3.7
 ATTIC INSTALLED DENSITY (LB/FT³) 1.45

This product meets the amended CPSC standard for flame resistance and corrosiveness of cellulose insulation

Class 1 Building Material

This product complies with CPSC Standards 16, CFR 1209 & 1404, & FTC Standard 16 CFR 460; Tested in accordance with ASTM C-739, E-84 & ML-STD 810D for fungi resistance

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CUT OUT AND STAPLE IN ATTIC

ATTIC CARD: STATEMENT OF COMPLIANCE FOR LOOSE FILL INSULATION: THIS INSULATION HAS BEEN INSTALLED IN CONFORMANCE WITH THE ABOVE RECOMMENDATIONS TO PROVIDE A VALUE OF R- _____ USING _____ BAGS OF INSULATION TO COVER _____ SQUARE FEET OF AREA.

Builder's Signature _____ Company Name _____ Date _____

Installer's Name _____ Company Name _____ Date _____