



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

December 09, 2025

### **SENT BY EMAIL**

Abigail Gibbons  
AGibbons@bcschem.com  
BULK CHEMICAL SERVICES, LLC

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling and Formulation Amendment - Updated Basic, Alt 1 and alt 2 CSFs and updated label.  
Product Name: BCS 3196W  
Admin Number: 82760-9  
EPA Receipt Date: 08/09/2023  
Action Case Number: 00488386

Dear Abigail Gibbons:

The amended label and Confidential Statements of Formula (CSFs) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6) you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 04/25/2024
- Alternate CSF #1 dated 04/25/2024
- Alternate CSF #2 dated 04/25/2024

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 FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). 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) lists 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, FIFRA section 12(a)(1)(B). 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 Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have questions, please contact Srinivas Gowda by telephone at (202) 565-0078 or via email at [gowda.srinivas@epa.gov](mailto:gowda.srinivas@epa.gov).

Sincerely,

A handwritten signature in black ink, reading "Heather A. Garvie". The script is elegant and cursive, with the first letters of each word being capitalized and prominent.

Heather Garvie, Senior Regulatory Advisor  
RMB 2, AD  
Office of Pesticide Programs

