

83851-5

02/04/2010

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

FEB 04 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Ann Tillman
AmTide LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 13th St. NW
Gig Harbor, WA 98332

Subject: Revised Container Disposal Instructions

Dear Ms. Tillman:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated January 22, 2010 for:

EPA Registration 83851-5

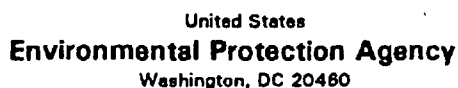
Amtide Technical Imidacloprid

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

Dani Daniel
Registration Division (7505P)
Insecticide/Rodenticide Branch



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

OPP Identifier Number

2/04/2010

1. Company/Product Number 83851-5	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="checked" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) AmtTide LLC/Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) AmtTide LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <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 _____	

<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.

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.

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) _____ lined fiber drum	
* 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		4. Size(s) Retail Container		5. Location of Label Directions	
<input checked="" type="checkbox"/> Label _____ <input type="checkbox"/> Container _____		2.2 kg (5 lb), 20 kg (44 lb), 25 kg (55 lb)		<input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name Ann M. Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
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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.

8. Date Application Received
(Stamped)

2. Signature Ann M. Tiller

3. Title
Agent

4. Typed Name
Ann M. Tillman

5. Date 1/22/2010

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
083851-00005	Jan. 22, 2010	083851-00005.20100122.Technical Imidacloprid.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Ann M. Miller

Signature
Ann M. Tillman
Agent, AmTide LLC

Jan. 22, 2010
Date

Figure 1 shows a 10x10 grid of circles, representing a 100% solution. The circles are arranged in a regular grid pattern, with some circles highlighted in black and others in white. The grid is labeled with "100%" at the top right.



21 Hubble, Irvine, CA. 92618, USA
Tel: 1-949-753-4923, Fax: 1-949-753-4927

November 6, 2009

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for AmTide, LLC (EPA Company Number 83851), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang, Ph.D
General Manager
AmTide LLC

cc: Pyxis Regulatory Consulting, Inc.

AmTide Letter of Authorization\JL-COS.doc

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NOTIFICATION

FEB 04 2010

Technical Imidacloprid
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

Imidacloprid,
1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....99.0%

OTHER INGREDIENTS:1.0%

TOTAL:100.0%

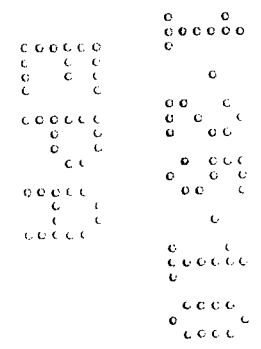
KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• 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 do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-949-679-3535 for emergency medical treatment information.	

EPA Reg. No. 83851-5
EPA Est. No.

Manufactured for:
AmTide LLC
21 Hubble
Irvine, CA 92618

Net Weight:



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

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product 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 EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

Instructions to Formulators: This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals in and around residential or commercial buildings;
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals
- 3): Terrestrial Non-food Crop Use, Domestic Indoor & Outdoor Use: companion animals.
- 4) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 5) Uses for experimental purposes that are in compliance with U.S. EPA requirements; and
- 6) Terrestrial Food Crops, including:

Barley	Pecan		
Head and Stem <i>Brassica</i> Vegetables	Pome Fruits		
Bushberries	Potato (including seed piece treatment)		
Canola	Root Vegetables		
Citrus (containerized and field)	Strawberries		
Cotton	Stone Fruit		
Cranberries	Sugarbeet		
Fruiting Vegetables	Tobacco		
Grapes	Tuberous and Corm Vegetables		
Greenhouse Vegetables (tomato, cucumber)	Tropical Fruits		
Hops	Oats		
Leafy Petiole Vegetables	Rye		
Leafy Vegetables	Sorghum		
Legume Vegetables	Wheat		

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

Container Disposal – Liner: Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

Container Disposal – Outer Drum: Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of box in a sanitary landfill.

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. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

CONDITION 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 must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of AmTide LLC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold AmTide LLC and Seller harmless for any claims relating to such factors.

AmTide LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or AmTide LLC, and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, AMTIDE LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, neither AmTide LLC or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF AMTIDE LLC 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 AMTIDE LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

AmTide LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of AmTide LLC.