



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

November 7, 2013

REPLY TO THE ATTENTION OF:

LC-8J

CERTIFIED MAIL 7001 0320 0005 8919 9668  
RETURN RECEIPT REQUESTED

Mr. Tom Lyons  
Executive Vice President  
Nufarm Americas  
11901 South Austin Avenue  
Alsip, Illinois 60803

Consent Agreement and Final Order In the Matter of Nufarm Americas, Inc.  
Docket Number **FIFRA-05-2014-0001**

Mr. Lyons:

Enclosed please find a copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on November 7, 2013 with the Regional Hearing Clerk.

The civil penalty in the amount of \$37,500 is to be paid in the manner described in paragraphs 80 and 81. Please be certain that the docket number is written on both the transmittal letter and on the check. Payment is due by December 7, 2013 (within 30 calendar days of the filing date).

Thank you for your cooperation in resolving this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Claudia Niess".

Claudia Niess  
Pesticides and Toxics Compliance Section

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

In the Matter of:

Nufarm Americas, Inc.  
Alsip, Illinois

Respondent.



Docket No. FIFRA-05-2014-0001

Proceeding to Assess a Civil Penalty  
Under Section 14(a) of the Federal  
Insecticide, Fungicide, and Rodenticide  
Act, 7 U.S.C. § 136l(a)

**Consent Agreement and Final Order**  
**Commencing and Concluding a Proceeding**

1. This is an administrative action commenced and concluded under Section 14(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. § 136l(a), and Sections 22.13(b) and 22.18(b)(2) and (3) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules) as codified at 40 C.F.R. Part 22.
2. The Complainant is the Director of the Land and Chemicals Division, United States Environmental Protection Agency (EPA), Region 5.
3. Respondent is Nufarm Americas, Inc. (Nufarm), a corporation doing business in Alsip, Illinois.
4. Where the parties agree to settle one or more causes of action before the filing of a complaint, the administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).
5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

**Jurisdiction and Waiver of Right to Hearing**

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

9. Respondent certifies that to the best of its knowledge, it is complying with FIFRA, 7 U.S.C. §§ 136 to 136y.

**Statutory and Regulatory Background**

10. The importation of pesticides into the United States is governed by Sections 17(c) and (e) of FIFRA, 7 U.S.C. §§ 136o(c) and 136o(e), and the regulations promulgated thereunder by the Secretary of the Treasury in consultation with the Administrator of EPA (the Administrator). These regulations are found at 19 C.F.R. Part 12.

11. 19 C.F.R. § 12.111 states in part that all imported pesticides are required to be registered under the provisions of Section 3 of FIFRA, 7 U.S.C. § 136a, and under the regulations promulgated at 40 C.F.R. § 162.10 by the Administrator, before being permitted entry into the United States.

12. 19 C.F.R. § 12.112 states in part that an importer desiring to import pesticides into the United States shall submit to the Administrator a Notice of Arrival of Pesticides or Devices (NOA) (EPA form 3540-1), prior to the arrival of the shipment in the United States. See also Section 17(c) of FIFRA, 7 U.S.C. § 136o(c).

13. Section 12(a)(1)(B) of FIFRA, 7 U.S.C. § 136j(a)(1)(B), states that it is unlawful

for any person in any state to distribute or sell any registered pesticide if any claims made for it as a part of its distribution or sale substantially differ from any claims made for it as part of the statement required in connection with its registration under FIFRA.

14. Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), states that it is unlawful for any person in any state to distribute or sell to any person any pesticide which is misbranded.

15. Section 2(q)(1)(E) of FIFRA, 7 U.S.C. § 136(q)(1)(E), states, in part, a pesticide is “misbranded” if any word, statement, or other information required by or under authority of FIFRA to appear on the label or labeling is not prominently placed thereon with such conspicuousness and in such terms as to render it likely to be read and understood by the ordinary individual under customary conditions of purchase and use.

16. 40 C.F.R. § 156.10(a)(2)(ii)(C) states that all required label text must not be obscured or crowded.

17. Section 2(q)(1)(F) of FIFRA, 7 U.S.C. § 136(q)(1)(F), states, in part, that a pesticide is “misbranded” if the labeling accompanying it does not contain directions for use which are necessary for effecting the purpose for which the product was intended and if complied with, are adequate to protect human health and the environment.

18. Section 2(q)(1)(G), of FIFRA, 7 U.S.C. § 136(q)(1)(G), states, in part, that a pesticide is “misbranded” if the label does not contain a warning or caution statement which may be necessary and if complied with, is adequate to protect human health and the environment.

19. Section 12(a)(2)(S) of FIFRA, 7 U.S.C. § 136j(a)(2)(S), states, in part, that it is unlawful for any person to violate any regulation issued under Section 19 of FIFRA.

20. Section 19(a)(1)(B) of FIFRA, 7 U.S.C. § 136q(a)(1)(B), states, in pertinent part, that the Administrator may require under Section 3 that the labeling of a pesticide contain

requirements and procedures for the transportation, storage, and disposal of any container of the pesticide.

21. Section 19(e)(1)(B) of FIFRA, 7 U.S.C. § 136q(e)(1)(B), states, in pertinent part, that the Administrator shall promulgate regulations that facilitate the safe disposal or refill and reuse of pesticide containers.

22. 40 C.F.R. § 156.140, which became effective on August 16, 2011, states, in pertinent part, that other than for plant-incorporated protectants, the following statements, as applicable, must be placed on the label or container of a pesticide as directed under the regulation:

(a) *Nonrefillable container.* For non-refillable containers, the statements in paragraphs

(a)(1) through (a)(4) of 40 C.F.R. § 156.140 are required.

(1) *Statement identifying a nonrefillable container.* The following phrase is required: “Nonrefillable container.”

(2) *Reuse statement.* One of the following statements is required.

(i) “Do not use or refill this container.”

(ii) “Do not reuse this container to hold materials other than pesticides or dilute pesticides (rinsate). After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state.”

(iii) The following statement may be used if a product is “ready to use” and its directions for use allow a different product (that is a similar, but concentrated formulation) to be poured into the container and

diluted by the end user: “Do not reuse or refill this container unless the directions for use allow a different (concentrated) product to be diluted in the container.”

(3) *Recycling or reconditioning statement.* One of the following statements is required:

(i) “Offer for recycling if available.”

(ii) “Once cleaned, some agricultural plastic pesticide containers can be taken to a container collection site or picked up for recycling. To find the nearest site, contact your chemical dealer or manufacturer or contact [a pesticide container recycling organization] at [phone number] or [web site].”

(iii) A recycling statement approved by EPA and published in an EPA document, such as a Pesticide Registration Notice.

(iv) An alternative recycling statement that has been reviewed and approved by EPA.

(v) “Offer for reconditioning if appropriate.”

(4) *Batch Code.* A lot number, or other code used by the registrant or producer to identify the batch of the pesticide product which is distributed and sold is required.

23. Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), defines the term “distribute or sell” to mean to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received) deliver or offer to deliver.

24. Section 2(t) of FIFRA, 7 U.S.C. § 136(t), defines a “pest” as any insect, rodent, nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other living micro-organisms on or in living man or other living animals) which the Administrator declares to be a pest under Section 25(c)(1) of FIFRA, 7 U.S.C. § 136 w(c)(1).

25. Section 2(u) of FIFRA, 7 U.S.C. § 136(u), defines a “pesticide” as any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.

26. Section 2(s) of FIFRA, 7 U.S.C. § 136(s), defines a “person” as any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not.

27. Section 2(y) of FIFRA, 7 U.S.C. § 136(y) defines a “registrant” as a person who has registered any pesticide pursuant to the provisions of FIFRA.

28. The Administrator may assess a civil penalty against any registrant who violates any provision of FIFRA of up to \$7,500 for each offense that occurred after January 12, 2009, pursuant to Section 14(a)(1) of FIFRA, 7 U.S.C. § 136l(a)(1), and 40 C.F.R. Part 19.

#### **Factual Allegations and Alleged Violations**

29. At all times relevant to this CAFO, Respondent was a corporation or any organized group of persons and therefore was a “person” as that term is defined at Section 2(s) of FIFRA, 7 U.S.C. § 136(s).

30. At all times relevant to this CAFO, Respondent was a “registrant” as that term is defined at Section 2(y) of FIFRA, 7 U.S.C. § 136(y).

#### **Glyphosate Technical**

31. On or about June 5, 2013, Respondent submitted to EPA an NOA under entry

number 231-6145665-6 for an import shipment of the pesticide “Glyphosate Technical,” EPA Registration Number (EPA Reg. No.) 35935-46.

32. The NOA stated that Respondent was the importer of record.

33. The import shipment associated with entry number 231-6145665-6 entered the United States on or about June 16, 2013.

34. Respondent, as the importer of record of “Glyphosate Technical,” EPA Reg. No. 35935-46, and by doing business in the United States, is subject to the requirements of FIFRA and the regulations promulgated thereunder.

35. “Glyphosate Technical,” EPA Reg. No. 35935-46, is a pesticide, as defined at Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

36. The imported quantity of “Glyphosate Technical,” EPA Reg. No. 35935-46, associated with entry number 231-6145665-6, failed to bear a label on the immediate containers of the pesticide product that identified the containers as being “refillable” or “non-refillable,” as required by 40 C.F.R. § 156.140.

37. The imported quantity of “Glyphosate Technical,” EPA Reg. No. 35935-46, associated with entry number 231-6145665-6 bore a label that obscured the product’s required label text.

38. On or about June 16, 2013, Respondent “distributed or sold” the pesticide “Glyphosate Technical,” EPA Reg. No. 35935-46, as that term is defined at Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg).

#### Sebring 480 FS Fungicide

39. On or about June 26, 2013, Respondent submitted to EPA an NOA under entry number 231-6149705-6 for an import shipment of the pesticide “Sebring 480 FS Fungicide,”



EPA Reg. No. 55146-106.

40. The NOA stated that Respondent was the importer of record.

41. Respondent, as the importer of record of "Sebring 480 FS Fungicide," EPA Reg. No. 55146-106, and by doing business in the United States, is subject to the requirements of FIFRA and the regulations promulgated thereunder.

42. The import shipment associated with entry number 231-6149705-6 entered the United States on or about June 25, 2013.

43. "Sebring 480 FS Fungicide," EPA Reg. No. 55146-106, is a pesticide, as defined at Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

44. The imported quantity of "Sebring 480 FS Fungicide," EPA Reg. No. 55146-106, associated with entry number 231-6149705-6, failed to bear a label on the immediate containers of the pesticide product that identified the containers as being "refillable" or "non-refillable," as required by 40 C.F.R. § 156.140.

45. One container in the imported quantity of "Sebring 480 FS Fungicide," EPA Reg. No. 55146-106, associated with entry number 231-6149705-6, bore a label that 1) did not contain the required directions for use and warning or caution statements and 2) contained required text that was obscured.

46. On or about June 25, 2013, Respondent "distributed or sold" the pesticide "Sebring 480 FS Fungicide," EPA Reg. No. 55146-106, as that term is defined at Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg).

Cloak EX Herbicide

47. On or about June 26, 2013, Respondent submitted to EPA an NOA under entry number 231-6153403-1 for an import shipment of the pesticide "Cloak EX Herbicide," EPA

Reg. No. 71368-84.

48. The NOA stated that Respondent was the importer of record.

49. Respondent, as the importer of record of "Cloak EX Herbicide," EPA Reg. No. 71368-84, and by doing business in the United States, is subject to the requirements of FIFRA and the regulations promulgated thereunder.

50. The import shipment associated with entry number 231-6153403-1 entered the United States on or about June 16, 2013.

51. "Cloak EX Herbicide," EPA Reg. No. 71368-84, is a pesticide, as defined at Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

52. The imported quantity of "Cloak EX Herbicide," EPA Reg. No. 71368-84, associated with entry number 231-6153403-1, bore a label that did not contain the required directions for use.

53. On or about June 16, 2013, Respondent "distributed or sold" the pesticide "Cloak EX Herbicide," EPA Reg. No. 71368-84, as that term is defined at Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg).

#### Fludioxonil Technical

54. On or about June 3, 2013, Respondent submitted to EPA an NOA under entry number 231-6155478-1 for an import shipment of "Fludioxonil Technical," EPA Reg. No. 35935-92.

55. On or about June 12, 2013, Respondent submitted to EPA an NOA under entry number 231-6157541-4 for an import shipment of "Fludioxonil Technical," EPA Reg. No. 35935-92.

56. The NOAs stated that Respondent was the importer of record.

57. Respondent, as the importer of “Fludioxonil Technical,” EPA Reg. No. 35935-92, and by doing business in the United States, is subject to the requirements of FIFRA and the regulations promulgated thereunder.

58. The import shipment associated with entry number 231-6155478-1 entered the United States on or about July 3, 2013.

59. The import shipment associated with entry number 231-6157541-4 entered the United States on or about July 11, 2013.

60. “Fludioxonil Technical,” EPA Reg. No. 35935-92, is a pesticide, as defined at Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

61. On October 6, 2011, EPA’s Office of Pesticide Programs issued an “accepted” label for “Fludioxonil Technical,” EPA Reg. No. 35935-92.

62. The imported quantities of “Fludioxonil Technical,” EPA Reg. No. 35935-92, associated with entry numbers 231-6155478-1 and 231-6157541-4, bore labels with ingredient statement which substantially differed from the October 6, 2011 “accepted” label.

63. On or about July 3 and 11, 2013, Respondent “distributed or sold” the pesticide “Fludioxonil Technical,” EPA Reg. No. 35935-92, as that term is defined at Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg).

### **Specific Allegations**

#### **Count 1**

64. Complainant incorporates by reference paragraphs 1 through 63 of this CAFO.

65. On or about June 16, 2013, in an import shipment associated with entry number 231-6145665-6, Respondent distributed or sold the pesticide “Glyphosate Technical,” EPA Reg. No. 35935-46, in violation of Sections 12(a)(1)(E) and 12(a)(2)(S) of FIFRA, 7 U.S.C.

§§ 136j(a)(1)(E) and 136j(a)(2)(S).

66. Respondent's violation of Sections 12(a)(1)(E) and 12(a)(2)(S) of FIFRA, 7 U.S.C. §§ 136j(a)(1)(E) and 136j(a)(2)(S), subjects Respondent to assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

Count 2

67. Complainant incorporates by reference paragraphs 1 through 63 of this CAFO.

68. On or about June 25, 2013, in an import shipment associated with entry number 231-6149705-6, Respondent distributed or sold the pesticide "Sebring 480 FS Fungicide," EPA Reg. No. 55146-106, in violation of Sections 12(a)(1)(E) and 12(a)(2)(S) of FIFRA, 7 U.S.C. §§ 136j(a)(1)(E) and 136j(a)(2)(S).

69. Respondent's violation of Sections 12(a)(1)(E) and 12(a)(2)(S) of FIFRA, 7 U.S.C. §§ 136j(a)(1)(E) and 136j(a)(2)(S), subjects Respondent to assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

Count 3

70. Complainant incorporates by reference paragraphs 1 through 63 of this CAFO.

71. On or about June 16, 2013, in an import shipment associated with entry number 231-6153403-1, Respondent distributed or sold the pesticide "Cloak EX Herbicide," EPA Reg. No. 71368-84, in violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

72. Respondent's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects Respondent to assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

Count 4

73. Complainant incorporates by reference paragraphs 1 through 63 of this CAFO.

74. On or about July 3, 2013, in an import shipment associated with entry number 231-6155478-1, Respondent distributed or sold the pesticide "Fludioxonil Technical," EPA Reg. No. 35935-92, in violation of Section 12(a)(1)(B) of FIFRA, 7 U.S.C. § 136j(a)(1)(B).

75. Respondent's violation of Section 12(a)(1)(B) of FIFRA, 7 U.S.C. § 136j(a)(1)(B), subjects Respondent to assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

#### Count 5

76. Complainant incorporates by reference paragraphs 1 through 63 of this CAFO.

77. On or about July 11, 2013, in an import shipment associated with entry number 231-6157541-4, Respondent distributed or sold the pesticide "Fludioxonil Technical," EPA Reg. No. 35935-92, in violation of Section 12(a)(1)(B) of FIFRA, 7 U.S.C. § 136j(a)(1)(B).

78. Respondent's violation of Section 12(a)(2)(B) of FIFRA, 7 U.S.C. § 136j(a)(1)(B), subjects Respondent to assessment of a civil penalty under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a).

#### Civil Penalty

79. Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(4), requires the Administrator to consider the size of the business of the person charged, the effect on the person's ability to continue in business, and the gravity of the violation, when assessing an administrative penalty under FIFRA.

80. Based on an evaluation of the facts alleged in this CAFO and the factors in Section 14(a)(4) of FIFRA, Complainant calculated an initial civil penalty against Respondent in the amount of \$37,500. Complainant evaluated the facts and circumstances of this case with specific reference to EPA's Enforcement Response Policy for the Federal Insecticide, Fungicide,

and Rodenticide Act, dated December 2009.

81. Within 30 days of the effective date of this CAFO, Respondent must pay a \$37,500 civil penalty for the alleged FIFRA violations. Respondent must pay the penalty by sending a cashier's or certified check, payable to the "Treasurer, United States of America," to:

U.S. EPA  
Fines and Penalties  
Cincinnati Finance Center  
P.O. Box 979077  
St. Louis, MO 63197-9000

The check must note "In the Matter of Nufarm Americas, Inc." and the docket number of this CAFO.

82. A transmittal letter, stating, Respondent's name, the case title, Respondent's complete address and the case docket number must accompany the payment. Respondent must send a copy of the check and transmittal letter to:

Regional Hearing Clerk (E-19J)  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

Claudia Niess (LC-8J)  
Pesticides and Toxics Compliance Section  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

Joanna Glowacki (C-14J)  
Office of Regional Counsel  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604

83. This civil penalty is not deductible for federal tax purposes.

84. If Respondent does not pay the civil penalty timely, EPA may refer the matter to the Attorney General who will recover such amount by action in the appropriate United States

district court under Section 14(a)(5) of FIFRA, 7 U.S.C. § 136l(a)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

85. Pursuant to 40 C.F.R. § 13.11 and 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was due at a rate established by the Secretary of the Treasury. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

#### **General Provisions**

86. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in the CAFO.

87. This CAFO does not affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

88. This CAFO does not affect Respondent's responsibility to comply with FIFRA and other applicable federal, state, and local laws.

89. This CAFO is a "final order" for purposes of EPA's Enforcement Response Policy for FIFRA.

90. The terms of this CAFO bind Respondent, its successors, and assigns.

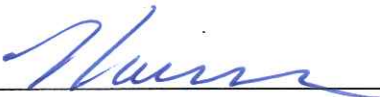
91. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

92. Each party agrees to bear its own costs and attorney fees in this action.

93. This CAFO constitutes the entire agreement between the parties.

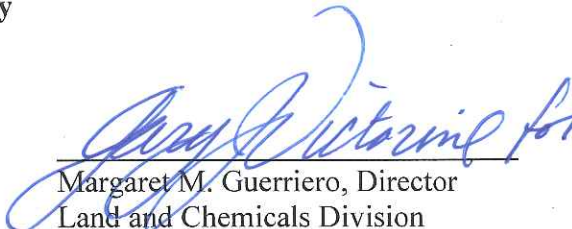
**Respondent:**  
**Nufarm Americas, Inc.**  
**Alsip, Illinois**

10/24/13  
Date

  
\_\_\_\_\_  
Tom Lyons  
Executive Vice President  
Nufarm Americas, Inc.

**Complainant:**  
**Region 5**  
**U.S. Environmental Protection Agency**

11/1/2013  
Date

  
\_\_\_\_\_  
Margaret M. Guerriero, Director  
Land and Chemicals Division  
United States Environmental Protection Agency  
Region 5



**In the Matter of:**  
**Nufarm Americas**  
**Docket No. FIFRA-05-2014-0001**

**Final Order**

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

11-4-13

\_\_\_\_\_  
Date



\_\_\_\_\_  
Susan Hedman  
Regional Administrator  
United States Environmental Protection Agency  
Region 5



CERTIFICATE OF SERVICE

I hereby certify that the original signed copy of the Consent Agreement and Final Order in resolution of the civil administrative action involving Nufarm Americas, Inc. was filed on November 7, 2013 with the Regional Hearing Clerk (E-19J), U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago Illinois 60604, and that I mailed, by Certified Mail, Receipt No. 7001 0320 0005 8919 9668, a copy of the original to the Respondent:

Mr. Tom Lyons  
Executive Vice President  
Nufarm Americas  
11901 South Austin Avenue  
Alsip, Illinois 60803

and forwarded copies (intra-Agency) to:

Ann Coyle, Regional Judicial Officer, ORC/C-14J  
Joanna Glowacki, Associate Regional Counsel, ORC/C-14J  
Eric Volk, Cincinnati Finance/MWD



\_\_\_\_\_  
Claudia Niess  
Pesticides and Toxics Compliance Section  
U.S. EPA – Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Docket No. FIFRA-05-2014-0001

