

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	Docket No. FIFRA-05-2023-0001
)	
State Industrial Products Corporation)	Proceeding to Assess a Civil Penalty
Mayfield Heights, Ohio,)	Under Section 14(a) of the Federal
)	Insecticide, Fungicide, and Rodenticide
Respondent.)	Act, 7 U.S.C. § 136l(a)
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Consent Agreement and Final Order

Preliminary Statement

1. This is a civil 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, by lawful delegation, the Director of the Enforcement and Compliance Assurance Division, United States Environmental Protection Agency, Region 5 (EPA).

3. Respondent is State Industrial Products Corporation (State Industrial Products), a corporation doing business in the State of Ohio.

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 it is complying with FIFRA, 7 U.S.C. §§ 136-136y, and the regulation at 40 C.F.R. § 152.132.

Statutory and Regulatory Background

10. A “pesticide” is, among other things, any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. 7 U.S.C. § 136(u).

11. A “pest” is 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 which the Administrator of EPA declares to be a pest under Section 25(c)(1) of FIFRA. 7 U.S.C. § 136(t).

12. A substance is considered to be intended for a pesticidal purpose, and thus to be a pesticide requiring registration, if the person who distributes or sells the substance claims, states, or implies (by labeling or otherwise) that the substance can or should be used as a pesticide. 40 C.F.R. § 152.15(a)(1).

13. The term “distribute or sell” means “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.” 7 U.S.C. § 136(gg).

14. The term “registrant” is defined at Section 2(y) of FIFRA to mean a person who has

registered any pesticide pursuant to the provisions of FIFRA, 7 U.S.C. § 136(y).

15. Under 40 C.F.R. § 152.132 (Supplemental distribution), a registrant may distribute or sell his registered pesticide product under another person's name and address instead of (or in addition to) his own. Such "distribution and sale" is termed "supplemental distribution" and the product is referred to as a "distributor product." The distributor is considered an agent of the registrant for all intents and purposes under FIFRA, and both the registrant and the distributor may be held liable for violations pertaining to the distributor product.

16. The regulation at 40 C.F.R. § 152.132 states that supplemental distribution is permitted upon notification to the Agency if all of the following conditions are met: (a) The registrant has submitted to the Agency for each distributor product a statement signed by both the registrant and the distributor listing the names and addresses of the registrant and the distributor, the distributor's company number, the additional brand name(s) to be used, and the registration number of the registered product, (b) The distributor product is produced, packaged and labeled in a registered establishment operated by the same producer who produces, packages, and labels the registered product, (c) The distributor product is not repackaged (remains in the producer's unopened containers), (d) The label of the distributor product is the same as that of the registered product, except that the product name of the distributor product may be different, the name and address of the distributor may appear instead of that of the registrant, the registration number of the registered product must be followed by a dash, followed by the distributor's company number, the establishment number must be that of the final establishment at which the product was produced, and specific claims may be deleted, provided that no other changes are necessary, and (e) Voluntary cancellation of a product applies to the registered product and all distributor products distributed or sold under that registration number.

17. Section 12(a)(1)(C) of FIFRA, 7 U.S.C. § 136j(a)(1)(C), makes it unlawful for any person in any State to distribute or sell to any person any registered pesticide the composition of which differs at the time of its distribution or sale from its composition as described in the statement required in connection with its registration under FIFRA.

18. The statement required in connection with the registration of a pesticide under FIFRA must include, among other things, the complete formula of the pesticide. 7 U.S.C. § 136j(a)(1)(C), 7 U.S.C. § 136a(c)(1)(D).

19. The Administrator of EPA may assess a civil penalty against any registrant, commercial applicator, wholesaler, dealer, retailer, or other distributor who violates any provision of FIFRA of up to \$21,805 for each offense that occurred after November 2, 2015, 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

20. Respondent is a “person” as defined at Section 2(s) of FIFRA, 7 U.S.C. § 136(s).

21. Respondent is a “registrant” as defined at Section 2(y) of FIFRA, 7 U.S.C. § 136(y).

22. Respondent is an “other distributor” within the meaning of Section 14(a)(1) of FIFRA, 7 U.S.C. § 136l(a)(1).

23. At all times relevant to this CAFO, Respondent owned or operated a place of business located at 5915 Landerbrook Drive, Mayfield Heights, Ohio during the calendar years 2019 and 2020.

24. At all times relevant to this CAFO, Respondent owned or operated a place of business located at 383 North High Street, Hebron, Ohio during the calendar years 2019 and 2020.

Neutral Disinfectant Cleaner (NDC) and Quick Defense NDC

25. At all times relevant to this CAFO, Respondent distributed or sold the products “Neutral Disinfectant Cleaner” (NDC) and “Quick Defense NDC.”

26. NDC and “Quick Defense NDC” are “pesticides” as defined at Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

27. On or about June 12, 2003, EPA registered the pesticide product “BTC 885 Neutral Disinfectant Cleaner 64” (EPA Registration No. 1839-169) to a registrant hereinafter referred to as “Registrant A.”

28. On or about September 20, 2016, EPA registered the pesticide product “SC-5:128N” (EPA Registration Number 1839-239) to Registrant A.

29. Registrant A submitted to EPA a Notice of Supplemental Distribution of a Registered Pesticide Product to allow for the “supplemental distribution” of Registrant A’s registered pesticide, “BTC 885 Neutral Disinfectant Cleaner-64” (EPA Registration No. 1839-169), by State Industrial Products under four separate brand names, including “NDC,” on or about the following dates: February 2, 1999, and November 22, 1999, and December 1, 1999.

30. “NDC” is a “distributor product,” and State Industrial Products’ distribution or sale of this product was a “supplemental distribution” of Registrant A’s registered pesticide product, all within the meaning of 40 C.F.R. § 152.132.

31. “NDC” is assigned EPA Registration No. 1839-169-70799.

32. On or about March 22, 2019, Registrant A submitted a Notice of Supplemental Distribution of a Registered Pesticide Product to EPA to allow for the “supplemental distribution” of Registrant A’s registered pesticide “SC 5:128N” (EPA Registration No. 1839-236) by State Industrial Products under the brand name “Quick Defense NDC.”

33. “Quick Defense NDC” is a “distributor product,” and State Industrial Products’ distribution or sale of this product was a “supplemental distribution” of Registrant A’s registered pesticide product, all within the meaning of 40 C.F.R. § 152.132.

34. “Quick Defense NDC” is assigned EPA Registration No. 1839-236-70799.

35. The statement required and accepted by EPA in connection with the FIFRA registration of “NDC” described the composition of this pesticide as including a specific source of the active ingredients that itself was registered as a pesticide.

36. The statement required and accepted by EPA in connection with the FIFRA registration of “Quick Defense NDC” described the composition of this pesticide as including a specific source of the active ingredients that itself was registered as a pesticide.

37. In a letter dated June 10, 2020, Respondent advised EPA that, in or about April 2020, State Industrial Products had produced batches of “NDC” and “Quick Defense NDC” using (as the source of the active ingredients) products other than the accepted source of the active ingredients identified in the registration-statements for the two registered pesticides, “BTC 885 Neutral Disinfectant Cleaner 64” (EPA Registration No. 1839-169) and “SC-5:128N” (EPA Registration Number 1839-239). In this letter, Respondent identified the substitute-products used as the source of the active ingredients in the formulation of NDC and Quick Defense NDC in or about April 2020 as “Seaco Chem 810-8” and “Tamen Q-408,” each of which was sourced from Gray Beard Material.

38. Respondent used the products “Seaco Chem 810-8” and “Tamen Q-408” obtained from Gray Beard Material as the source of the active ingredients to produce one batch of NDC and two batches of Quick Defense NDC.

39. “Seaco Chem 810-8” was not registered as a pesticide with EPA under Section 3 of

FIFRA, 7 U.S.C. § 136a, at any time between in or about April 2020 and in or about June 2020.

40. “Tamen Q-408” was not registered as a pesticide with EPA under Section 3 of FIFRA, 7 U.S.C. § 136a, at any time between in or about April 2020 and in or about June 2020.

41. “Seaco Chem 810-8” has not been accepted as the product used as the source of the active ingredients in the formulation of “BTC 885 Neutral Disinfectant Cleaner-64” (EPA Registration No. 1839-169) or “SC 5:128N” (EPA Registration No. 1839-236) in the statements required as part of the FIFRA registrations of those pesticides.

42. “Tamen Q-408” has not been accepted as the product used as the source of the active ingredients in the formulation of “BTC 885 Neutral Disinfectant Cleaner-64” (EPA Registration No. 1839-169) or “SC 5:128N” (EPA Registration No. 1839-236) in the statements required as part of the FIFRA registrations of those pesticides.

43. At the time of the alleged violations, Gray Beard Materials had not been accepted as a producer of any source of the active ingredients in the statements required as part of the registrations of “BTC 885 Neutral Disinfectant Cleaner-64” (EPA Registration No. 1839-169) or “SC 5:128N” (EPA Registration No. 1839-236).

44. The units of “NDC” and “Quick Defense NDC” that Respondent produced while using “Seaco Chem 810-8” or “Tamen Q-408” as a source of the active ingredients were pesticides the composition of which differed at the time of their distribution or sale from the composition as described in the statement required in connection with each pesticide’s registration under FIFRA.

45. Between on or about April 8, 2020 and on or about June 2, 2020, Respondent distributed or sold units of “NDC” and “Quick Defense NDC” which had been formulated using the Gray Beard Materials products identified above as the source of the active ingredients on at

least two hundred and ninety-nine (299) separate occasions, as set forth in Tables 1 and 2, attached.

46. At the time the units of “NDC” and “Quick Defense NDC” were distributed or sold on the dates set forth in Tables 1 and 2, attached, the composition of each pesticide differed from its composition as described in the statement required in connection with its registration under FIFRA, in that these units of “NDC” and “Quick Defense NDC” had been formulated using as the source(s) of active ingredients one or more products that were different from the product(s) identified as the source(s) of active ingredients in the statement required in connection with each pesticide’s registration under FIFRA, and that had been obtained from a supplier that was different from the supplier identified in the statement required in connection with each pesticide’s registration under FIFRA.

47. Because the composition of each of the registered pesticides “NDC” and “Quick Defense NDC” differed at the time of its distribution or sale from its composition as described in the statement required in connection with its registration under FIFRA, each of Respondent’s 299 distributions or sales of “NDC” or “Quick Defense NDC” constituted a separate and distinct unlawful act under Section 12(a)(1)(C) of FIFRA, 7 U.S.C. § 136j(a)(1)(C).

Formula 236 Terg-O-Cide

48. At all times relevant to this CAFO, Respondent also distributed or sold the product “Formula 236 Terg-O-Cide.”

49. “Formula 236 Terg-O-Cide” is a “pesticide” as defined at Section 2(u) of FIFRA, 7 U.S.C. § 136(u).

50. On or about October 19, 2004, EPA conditionally registered the pesticide product “Maquat 64-NHQ” (EPA Registration No. 10324-154) to a registrant hereinafter referred to as

“Registrant B.” On or about May 11, 2015, EPA re-registered this pesticide product.

51. On or about June 7, 2019, Registrant B submitted to EPA a Notice of Supplemental Distribution of a Registered Pesticide Product to allow for the “supplemental distribution” of Registrant B’s registered pesticide, “Maquat 64-NHQ” (EPA Registration No. 10324-154), by State Industrial Products under the brand name, “Formula 236 Terg-O-Cide” (“Formula 236”), EPA Registration No. 10324-154-70799.

52. At all times relevant to this CAFO, State Industrial Products distributed and sold “Formula 236” under the brand names “Formula 236 Terg-O-Cide” and “Formula 236 Scented Terg-O-Cide,” EPA Registration No. 10324-154-70799.

53. “Formula 236” is a “distributor product,” and State Industrial Products’ distribution or sale of this product was a “supplemental distribution” of Registrant B’s registered pesticide product, all within the meaning of 40 C.F.R. § 152.132.

54. “Formula 236” is assigned EPA Registration No. 10324-154-70799.

55. The statement required and accepted by EPA in connection with the FIFRA registration of “Maquat 64-NHQ” and the distributor product “Formula 236” identified product specifications for the active ingredient(s) in “Formula 236,” including the prescribed concentrations of the active ingredient(s).

56. On or about June 1, 2020, Respondent sent a letter to EPA, in which State Industrial Products advised EPA that, on May 28, 2020, it had tested a batch of “Formula 236” and discovered that this particular batch of “Formula 236” did not meet product specifications for active raw material content, including the prescribed concentration of active ingredient(s), and that, therefore, the batch of “Formula 236” at issue “may not have been as effective as intended against caliciviridae, including norovirus.” Respondent also advised EPA that it had immediately

issued a recall of the affected batch of “Formula 236.” State Industrial Products further advised EPA that it had determined that the off-specification batch of “Formula 236” was sold and distributed to only a single customer, the U.S. Army Base at Fort Carson, Colorado, sometime after mid-April 2020, and that State Industrial was successful in recalling “all or virtually all” of the off-specification “Formula 236” product.

57. The statement required and accepted by EPA in connection with the FIFRA registration of “Maquat 64-NHQ” and the distributor product “Formula 236” described the composition of this pesticide as including a specific source of active ingredients that itself was registered as a pesticide.

58. According to records provided by Respondent to EPA, State Industrial Products produced a batch of “Formula 236” using as a source of active ingredients a product other than the accepted source of active ingredients identified in the registration-statement for the registered pesticide, “Maquat 64-NHQ” (EPA Registration No. 10324-154), and for the distributor product, “Formula 236” (EPA Registration No. 10324-154-70799).

59. The units of “Formula 236” that Respondent produced while using a substitute source of active ingredients were pesticides the composition of which differed at the time of their distribution or sale from the composition as described in the statement required in connection with the pesticide’s registration under FIFRA.

60. On or about June 24, 2020, in response to a request from EPA, Respondent provided records to EPA which demonstrated that State Industrial Products had distributed or sold units of “Formula 236” which had been formulated using the substitute-product as the source of active ingredients on or about April 17, 2020.

61. At the time the units of “Formula 236” were distributed or sold on or about April

17, 2020, those units of “Formula 236” contained the substitute-products which had not been accepted as a source of active ingredients for the registered pesticide “Formula 236,” and therefore, the composition of the units of “Formula 236” distributed or sold by Respondent on or about April 17, 2020, differed from the composition of this pesticide as described in the statement required in connection with its registration under FIFRA.

62. Because the composition of the registered pesticide “Formula 236” differed at the time of its distribution or sale from its composition as described in the statement required in connection with its registration under FIFRA, the distribution or sale of “Formula 236” on or about April 17, 2020, constituted an unlawful act under Section 12(a)(1)(C) of FIFRA, 7 U.S.C. § 136j(a)(1)(C).

Civil Penalty

63. Pursuant to Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), Complainant determined that an appropriate civil penalty to settle this action is **Seven-Hundred Fourteen Thousand Eight-Hundred Eighty Dollars (\$714,880)**. In determining the penalty amount, Complainant considered the appropriateness of the penalty to the size of Respondent’s business, the effect on Respondent’s ability to continue in business, and the gravity of the violation. Complainant also considered EPA’s FIFRA Enforcement Response Policy, dated December 2009.

64. Within thirty (30) days after the effective date of this CAFO, Respondent must pay a \$714,880 civil penalty for the FIFRA violations identified above by electronic funds transfer, payable to “Treasurer, United States of America,” and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
“D 68010727 Environmental Protection Agency”

In the comment or description field of the electronic funds transfer, Respondent must state “State Industrial Products Corporation” and provide the docket number of this CAFO.

65. Respondent must send a notice of payment that states Respondent’s name and the case docket number to EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
R5hearingclerk@epa.gov

Claudia Niess (ECP-17J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Boulevard.
Chicago, Illinois 60604
niess.claudia@epa.gov

James Cha (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604
cha.james@epa.gov

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

67. If Respondent does not pay timely the civil penalty, 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.

68. Pursuant to 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

69. The parties consent to service of this CAFO by e-mail at the following valid e-mail addresses: cha.james@epa.gov (for Complainant), and mthurlow@bakerlaw.com (for Respondent). Respondent understands that the CAFO will become publicly available upon filing.

70. The Respondent's full compliance with this CAFO resolves only Respondent's liability for federal civil penalties for the violations alleged in the CAFO.

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

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

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

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

75. 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.

76. Each party agrees to bear its own costs and attorneys' fees, in this action.

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

State Industrial Products Corporation, Respondent

12/9/22

Date

Steven Strang

Digitally signed by Steven Strang
DN: cn=Steven Strang, o=State Industrial Products,
ou, email=SStrang@stateindustrial.com, c=US
Date: 2022.12.09 16:51:26 -05'00'

Steven D. Strang, Esq.
General Counsel and Vice President
State Industrial Products Corporation

United States Environmental Protection Agency, Complainant

Date

MICHAEL HARRIS Digitally signed by MICHAEL
HARRIS
Date: 2022.12.13 16:09:24 -06'00'

Michael D. Harris
Director
Enforcement and Compliance Assurance Division

In the Matter of:
State Industrial Products Corporation
Docket No. FIFRA-05-2023-0001

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.

Date

ANN COYLE Digitally signed by ANN COYLE
Date: 2022.12.15 11:07:24
-06'00'

Ann L. Coyle
Regional Judicial Officer
United States Environmental Protection Agency
Region 5

Table 1

Distributions or Sales of NDC, EPA Reg. No. 1839-169-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
1	1839-169-70799	Customer 257	WV	4/29/2020
2	1839-169-70799	Customer 77	PA	5/4/2020
3	1839-169-70799	Customer 135	PA	5/6/2020
4	1839-169-70799	Customer 179	PA	5/6/2020
5	1839-169-70799	Customer 180	PA	5/8/2020
6	1839-169-70799	Customer 205	PA	5/8/2020
7	1839-169-70799	Customer 207	PA	5/8/2020
8	1839-169-70799	Customer 206	PA	5/11/2020
9	1839-169-70799	Customer 266	PA	5/12/2020
10	1839-169-70799	Customer 180	PA	5/26/2020
11	1839-169-70799	Customer 14	IN	5/27/2020
12	1839-169-70799	Customer 78	PA	5/27/2020
13	1839-169-70799	Customer 13	OH	5/28/2020
14	1839-169-70799	Customer 213	OH	6/1/2020

Table 2

Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
15	1839-236-70799	Customer 254	OH	4/8/2020
16	1839-236-70799	Customer 193	PA	4/8/2020
17	1839-236-70799	Customer 108	GA	4/8/2020
18	1839-236-70799	Customer 109	GA	4/8/2020
19	1839-236-70799	Customer 145	SC	4/8/2020
20	1839-236-70799	Customer 73	WI	4/8/2020
21	1839-236-70799	Customer 223	TX	4/8/2020
22	1839-236-70799	Customer 66	OH	4/8/2020
23	1839-236-70799	Customer 240	IA	4/8/2020
24	1839-236-70799	Customer 244	OH	4/8/2020
25	1839-236-70799	Customer 159	OH	4/8/2020
26	1839-236-70799	Customer 42	TX	4/8/2020
27	1839-236-70799	Customer 112	IL	4/8/2020
28	1839-236-70799	Customer 3	IL	4/8/2020
29	1839-236-70799	Customer 144	OH	4/8/2020
30	1839-236-70799	Customer 198	WI	4/8/2020
31	1839-236-70799	Customer 156	IL	4/8/2020
32	1839-236-70799	Customer 81	IL	4/8/2020
33	1839-236-70799	Customer 111	MI	4/8/2020
34	1839-236-70799	Customer 122	OH	4/8/2020
35	1839-236-70799	Customer 61	FL	4/8/2020
36	1839-236-70799	Customer 160	GA	4/8/2020
37	1839-236-70799	Customer 116	IL	4/8/2020
38	1839-236-70799	Customer 129	NY	4/8/2020
39	1839-236-70799	Customer 59	IL	4/8/2020
40	1839-236-70799	Customer 210	MN	4/8/2020
41	1839-236-70799	Customer 255	PA	4/8/2020
42	1839-236-70799	Customer 4	IL	4/8/2020
43	1839-236-70799	Customer 256	IN	4/8/2020
44	1839-236-70799	Customer 185	KY	4/8/2020
45	1839-236-70799	Customer 200	OH	4/8/2020
46	1839-236-70799	Customer 60	IL	4/8/2020
47	1839-236-70799	Customer 220	OH	4/8/2020
48	1839-236-70799	Customer 231	NY	4/8/2020
49	1839-236-70799	Customer 64	OH	4/8/2020
50	1839-236-70799	Customer 94	IL	4/8/2020
51	1839-236-70799	Customer 143	OH	4/8/2020
52	1839-236-70799	Customer 21	NY	4/8/2020
53	1839-236-70799	Customer 91	TN	4/8/2020
54	1839-236-70799	Customer 192	OH	4/8/2020

Table 2

Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
55	1839-236-70799	Customer 192	OH	4/8/2020
56	1839-236-70799	Customer 215	VA	4/8/2020
57	1839-236-70799	Customer 146	MA	4/8/2020
58	1839-236-70799	Customer 31	PA	4/8/2020
59	1839-236-70799	Customer 115	MI	4/8/2020
60	1839-236-70799	Customer 110	IL	4/8/2020
61	1839-236-70799	Customer 56	TN	4/8/2020
62	1839-236-70799	Customer 139	NY	4/8/2020
63	1839-236-70799	Customer 159	OH	4/8/2020
64	1839-236-70799	Customer 166	NY	4/8/2020
65	1839-236-70799	Customer 166	NY	4/8/2020
66	1839-236-70799	Customer 147	AZ	4/9/2020
67	1839-236-70799	Customer 44	MA	4/9/2020
68	1839-236-70799	Customer 190	IL	4/9/2020
69	1839-236-70799	Customer 1	WA	4/9/2020
70	1839-236-70799	Customer 12	LA	4/9/2020
71	1839-236-70799	Customer 1	AL	4/10/2020
72	1839-236-70799	Customer 30	LA	4/13/2020
73	1839-236-70799	Customer 101	TX	4/13/2020
74	1839-236-70799	Customer 148	TX	4/13/2020
75	1839-236-70799	Customer 40	TX	4/13/2020
76	1839-236-70799	Customer 49	TX	4/13/2020
77	1839-236-70799	Customer 72	TX	4/13/2020
78	1839-236-70799	Customer 55	NC	4/13/2020
79	1839-236-70799	Customer 58	TX	4/13/2020
80	1839-236-70799	Customer 113	TX	4/13/2020
81	1839-236-70799	Customer 226	GA	4/14/2020
82	1839-236-70799	Customer 260	IL	4/14/2020
83	1839-236-70799	Customer 34	NY	4/14/2020
84	1839-236-70799	Customer 106	TN	4/14/2020
85	1839-236-70799	Customer 97	MD	4/14/2020
86	1839-236-70799	Customer 93	NY	4/14/2020
87	1839-236-70799	Customer 27	IN	4/14/2020
88	1839-236-70799	Customer 183	MN	4/14/2020
89	1839-236-70799	Customer 174	MI	4/14/2020
90	1839-236-70799	Customer 176	OH	4/14/2020
91	1839-236-70799	Customer 140	PA	4/14/2020
92	1839-236-70799	Customer 102	NY	4/14/2020
93	1839-236-70799	Customer 182	MN	4/14/2020
94	1839-236-70799	Customer 90	WI	4/14/2020

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Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
95	1839-236-70799	Customer 194	FL	4/14/2020
96	1839-236-70799	Customer 50	NC	4/14/2020
97	1839-236-70799	Customer 167	NY	4/14/2020
98	1839-236-70799	Customer 264	VA	4/14/2020
99	1839-236-70799	Customer 86	FL	4/15/2020
100	1839-236-70799	Customer 251	FL	4/15/2020
101	1839-236-70799	Customer 79	TX	4/15/2020
102	1839-236-70799	Customer 125	IL	4/15/2020
103	1839-236-70799	Customer 168	KY	4/15/2020
104	1839-236-70799	Customer 76	NY	4/15/2020
105	1839-236-70799	Customer 114	IL	4/15/2020
106	1839-236-70799	Customer 153	CO	4/16/2020
107	1839-236-70799	Customer 238	OH	4/16/2020
108	1839-236-70799	Customer 246	AL	4/16/2020
109	1839-236-70799	Customer 224	OH	4/16/2020
110	1839-236-70799	Customer 87	GA	4/16/2020
111	1839-236-70799	Customer 133	IL	4/16/2020
112	1839-236-70799	Customer 177	IL	4/16/2020
113	1839-236-70799	Customer 204	OH	4/17/2020
114	1839-236-70799	Customer 162	GA	4/17/2020
115	1839-236-70799	Customer 99	TN	4/17/2020
116	1839-236-70799	Customer 178	IL	4/17/2020
117	1839-236-70799	Customer 123	OH	4/17/2020
118	1839-236-70799	Customer 1	ID	4/20/2020
119	1839-236-70799	Customer 23	CO	4/20/2020
120	1839-236-70799	Customer 127	NJ	4/20/2020
121	1839-236-70799	Customer 172	GA	4/20/2020
122	1839-236-70799	Customer 51	OH	4/20/2020
123	1839-236-70799	Customer 1	IN	4/20/2020
124	1839-236-70799	Customer 81	IL	4/20/2020
125	1839-236-70799	Customer 138	MA	4/20/2020
126	1839-236-70799	Customer 227	NY	4/20/2020
127	1839-236-70799	Customer 39	OH	4/20/2020
128	1839-236-70799	Customer 234	GA	4/21/2020
129	1839-236-70799	Customer 19	GA	4/21/2020
130	1839-236-70799	Customer 153	CO	4/21/2020
131	1839-236-70799	Customer 171	GA	4/21/2020
132	1839-236-70799	Customer 164	PA	4/21/2020
133	1839-236-70799	Customer 36	AL	4/21/2020
134	1839-236-70799	Customer 128	TX	4/21/2020

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Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
135	1839-236-70799	Customer 121	LA	4/21/2020
136	1839-236-70799	Customer 121	LA	4/21/2020
137	1839-236-70799	Customer 221	NY	4/21/2020
138	1839-236-70799	Customer 124	MN	4/21/2020
139	1839-236-70799	Customer 209	NY	4/22/2020
140	1839-236-70799	Customer 210	MN	4/22/2020
141	1839-236-70799	Customer 141	TX	4/22/2020
142	1839-236-70799	Customer 10	VA	4/22/2020
143	1839-236-70799	Customer 131	TX	4/22/2020
144	1839-236-70799	Customer 208	NJ	4/23/2020
145	1839-236-70799	Customer 173	GA	4/23/2020
146	1839-236-70799	Customer 250	GA	4/23/2020
147	1839-236-70799	Customer 5	NY	4/23/2020
148	1839-236-70799	Customer 106	TN	4/23/2020
149	1839-236-70799	Customer 130	NY	4/23/2020
150	1839-236-70799	Customer 158	TX	4/23/2020
151	1839-236-70799	Customer 141	TX	4/23/2020
152	1839-236-70799	Customer 57	AL	4/24/2020
153	1839-236-70799	Customer 117	IL	4/24/2020
154	1839-236-70799	Customer 165	IL	4/24/2020
155	1839-236-70799	Customer 155	PA	4/24/2020
156	1839-236-70799	Customer 202	IN	4/24/2020
157	1839-236-70799	Customer 22	IA	4/24/2020
158	1839-236-70799	Customer 168	KY	4/24/2020
159	1839-236-70799	Customer 26	IL	4/24/2020
160	1839-236-70799	Customer 54	SC	4/27/2020
161	1839-236-70799	Customer 88	GA	4/27/2020
162	1839-236-70799	Customer 132	GA	4/27/2020
163	1839-236-70799	Customer 259	GA	4/27/2020
164	1839-236-70799	Customer 191	SC	4/27/2020
165	1839-236-70799	Customer 154	AL	4/27/2020
166	1839-236-70799	Customer 189	GA	4/27/2020
167	1839-236-70799	Customer 199	GA	4/27/2020
168	1839-236-70799	Customer 262	GA	4/27/2020
169	1839-236-70799	Customer 175	GA	4/27/2020
170	1839-236-70799	Customer 32	SC	4/27/2020
171	1839-236-70799	Customer 222	SC	4/27/2020
172	1839-236-70799	Customer 100	SC	4/27/2020
173	1839-236-70799	Customer 29	GA	4/27/2020
174	1839-236-70799	Customer 247	GA	4/27/2020

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Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
175	1839-236-70799	Customer 229	AL	4/27/2020
176	1839-236-70799	Customer 177	IL	4/27/2020
177	1839-236-70799	Customer 11	FL	4/27/2020
178	1839-236-70799	Customer 242	OH	4/27/2020
179	1839-236-70799	Customer 239	NC	4/28/2020
180	1839-236-70799	Customer 2	NY	4/28/2020
181	1839-236-70799	Customer 253	MD	4/28/2020
182	1839-236-70799	Customer 235	NY	4/28/2020
183	1839-236-70799	Customer 219	OH	4/28/2020
184	1839-236-70799	Customer 98	AZ	4/28/2020
185	1839-236-70799	Customer 225	PA	4/28/2020
186	1839-236-70799	Customer 33	IL	4/29/2020
187	1839-236-70799	Customer 25	NJ	4/29/2020
188	1839-236-70799	Customer 7	NY	4/30/2020
189	1839-236-70799	Customer 187	PA	4/30/2020
190	1839-236-70799	Customer 243	OH	4/30/2020
191	1839-236-70799	Customer 147	AZ	4/30/2020
192	1839-236-70799	Customer 219	OH	4/30/2020
193	1839-236-70799	Customer 252	MI	4/30/2020
194	1839-236-70799	Customer 120	NY	5/1/2020
195	1839-236-70799	Customer 161	CA	5/1/2020
196	1839-236-70799	Customer 181	OH	5/4/2020
197	1839-236-70799	Customer 181	OH	5/4/2020
198	1839-236-70799	Customer 181	WI	5/4/2020
199	1839-236-70799	Customer 181	OH	5/4/2020
200	1839-236-70799	Customer 258	NY	5/4/2020
201	1839-236-70799	Customer 16	LA	5/4/2020
202	1839-236-70799	Customer 142	GA	5/4/2020
203	1839-236-70799	Customer 71	FL	5/4/2020
204	1839-236-70799	Customer 52	TN	5/4/2020
205	1839-236-70799	Customer 161	CA	5/4/2020
206	1839-236-70799	Customer 137	MI	5/6/2020
207	1839-236-70799	Customer 126	LA	5/6/2020
208	1839-236-70799	Customer 95	IN	5/6/2020
209	1839-236-70799	Customer 24	IL	5/6/2020
210	1839-236-70799	Customer 96	IL	5/6/2020
211	1839-236-70799	Customer 43	KY	5/7/2020
212	1839-236-70799	Customer 134	OH	5/7/2020
213	1839-236-70799	Customer 163	PA	5/7/2020
214	1839-236-70799	Customer 35	FL	5/7/2020

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Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
215	1839-236-70799	Customer 8	IL	5/7/2020
216	1839-236-70799	Customer 53	VA	5/7/2020
217	1839-236-70799	Customer 105	NY	5/8/2020
218	1839-236-70799	Customer 237	OH	5/8/2020
219	1839-236-70799	Customer 15	PA	5/8/2020
220	1839-236-70799	Customer 238	OH	5/11/2020
221	1839-236-70799	Customer 82	NY	5/11/2020
222	1839-236-70799	Customer 228	NY	5/11/2020
223	1839-236-70799	Customer 254	OH	5/11/2020
224	1839-236-70799	Customer 74	NJ	5/11/2020
225	1839-236-70799	Customer 232	TX	5/11/2020
226	1839-236-70799	Customer 45	CA	5/11/2020
227	1839-236-70799	Customer 62	FL	5/12/2020
228	1839-236-70799	Customer 184	FL	5/12/2020
229	1839-236-70799	Customer 107	GA	5/12/2020
230	1839-236-70799	Customer 157	GA	5/12/2020
231	1839-236-70799	Customer 47	LA	5/12/2020
232	1839-236-70799	Customer 75	TX	5/12/2020
233	1839-236-70799	Customer 38	LA	5/12/2020
234	1839-236-70799	Customer 150	IN	5/12/2020
235	1839-236-70799	Customer 20	TX	5/12/2020
236	1839-236-70799	Customer 28	VA	5/12/2020
237	1839-236-70799	Customer 46	FL	5/12/2020
238	1839-236-70799	Customer 136	IL	5/12/2020
239	1839-236-70799	Customer 245	PA	5/12/2020
240	1839-236-70799	Customer 152	NJ	5/12/2020
241	1839-236-70799	Customer 17	NY	5/13/2020
242	1839-236-70799	Customer 103	NC	5/13/2020
243	1839-236-70799	Customer 22	IA	5/13/2020
244	1839-236-70799	Customer 69	TN	5/13/2020
245	1839-236-70799	Customer 261	OH	5/13/2020
246	1839-236-70799	Customer 65	IL	5/13/2020
247	1839-236-70799	Customer 196	TX	5/13/2020
248	1839-236-70799	Customer 36	AL	5/14/2020
249	1839-236-70799	Customer 18	WV	5/14/2020
250	1839-236-70799	Customer 80	TN	5/14/2020
251	1839-236-70799	Customer 186	TX	5/14/2020
252	1839-236-70799	Customer 118	NY	5/15/2020
253	1839-236-70799	Customer 24	IL	5/15/2020
254	1839-236-70799	Customer 67	MI	5/15/2020

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Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
255	1839-236-70799	Customer 96	IN	5/15/2020
256	1839-236-70799	Customer 84	PA	5/15/2020
257	1839-236-70799	Customer 110	IL	5/15/2020
258	1839-236-70799	Customer 151	TX	5/15/2020
259	1839-236-70799	Customer 169	NY	5/18/2020
260	1839-236-70799	Customer 195	OH	5/18/2020
261	1839-236-70799	Customer 6	IL	5/18/2020
262	1839-236-70799	Customer 63	GA	5/19/2020
263	1839-236-70799	Customer 151	TX	5/19/2020
264	1839-236-70799	Customer 248	IL	5/19/2020
265	1839-236-70799	Customer 201	KY	5/19/2020
266	1839-236-70799	Customer 89	FL	5/19/2020
267	1839-236-70799	Customer 218	AZ	5/19/2020
268	1839-236-70799	Customer 41	FL	5/20/2020
269	1839-236-70799	Customer 217	OH	5/21/2020
270	1839-236-70799	Customer 233	IL	5/21/2020
271	1839-236-70799	Customer 212	PA	5/21/2020
272	1839-236-70799	Customer 37	IL	5/21/2020
273	1839-236-70799	Customer 265	PA	5/21/2020
274	1839-236-70799	Customer 214	SC	5/22/2020
275	1839-236-70799	Customer 68	GA	5/22/2020
276	1839-236-70799	Customer 236	MI	5/22/2020
277	1839-236-70799	Customer 188	CO	5/22/2020
278	1839-236-70799	Customer 170	MI	5/22/2020
279	1839-236-70799	Customer 203	PA	5/26/2020
280	1839-236-70799	Customer 249	OH	5/26/2020
281	1839-236-70799	Customer 70	OH	5/26/2020
282	1839-236-70799	Customer 83	NY	5/26/2020
283	1839-236-70799	Customer 248	IL	5/26/2020
284	1839-236-70799	Customer 154	AL	5/27/2020
285	1839-236-70799	Customer 89	FL	5/27/2020
286	1839-236-70799	Customer 92	SC	5/28/2020
287	1839-236-70799	Customer 85	KY	5/28/2020
288	1839-236-70799	Customer 211	PA	5/28/2020
289	1839-236-70799	Customer 48	OH	5/28/2020
290	1839-236-70799	Customer 119	CA	5/28/2020
291	1839-236-70799	Customer 263	MI	5/28/2020
292	1839-236-70799	Customer 104	IA	5/29/2020
293	1839-236-70799	Customer 241	PA	5/29/2020
294	1839-236-70799	Customer 197	OH	5/29/2020

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Distributions or Sales of Quick Defense NDC, EPA Reg. No. 1839-236-70799

Count Number	EPA Reg. No.	Customer Name [CBI Redacted]	State	Shipment Date
295	1839-236-70799	Customer 16	LA	5/29/2020
296	1839-236-70799	Customer 216	OH	6/1/2020
297	1839-236-70799	Customer 115	MI	6/1/2020
298	1839-236-70799	Customer 9	NY	6/1/2020
299	1839-236-70799	Customer 230	CO	6/2/2020