



CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

4/22/08

United States Environmental Protection Agency
Region 8
Attn: Regional Hearing Clerk
1595 Wynkoop St
Denver, CO 80202-1129

RE: Docket No. FIFRA-08-2008-006

To Whom It May Concern:

We are in receipt of the penalty complaint and notice of opportunity for hearing reflecting the above mentioned docket number dated 3/24/08 and received in our offices 4/11/08. We are responding within the 30 day time frame from receipt of document and hereby request an informal settlement conference. We also wish to preserve our right to a public hearing before an administrative law judge.

We are opposing the penalty of \$33,150.00 on the grounds that we were not able to neither update our labeling requirements with the products outlined in the complaint nor were we able to supply registration agreements with Lonza or Stepan because we have been working with EPA in Washington, D.C. since 8/13/07 to have a company name change approved.

On 5/18/07 Ms. Amy Hambrick, EPA inspector for Region 8 did in fact visit our facility for an inspection. Pursuant to that inspection we ultimately paid a fine of \$2600.00 on 9/14/07 for failure to file a pesticide report for year 2006 by 3/1/07 (Docket No. FIFRA-08-2007-0007). Pursuant to that fine and inspection Ms. Hambrick asked that I submit to her bulk packaging agreements from Lonza and Stepan for the mentioned products in the complaint. She also wanted us to update our labels to meet then current requirements. We understood that this was necessary and began the process.

On 7/10/07 during a label compliance conversation with Stepan, we were informed that our Company was not a sub registrant with Stepan or Lonza and we could not obtain packaging agreements or current labeling requirements. We have been a sub registrant for many years; however a move of location in 2005 from our original address triggered questions as to the validity of our ability to manufacture registered formulations.

All of the formulations mentioned in the complaint were originally sub registered to Hadco Chemical Company at 1339 W. Cedar Ave., Denver, CO 80223 with Mr Joseph Gadd. In February of 1997, Crystal Packaging, Inc. purchased Hadco Chemical Co.

Crystal

From that time until November of 2005 we operated 2 locations: one at our present address and the other at the Hadco location. Hadco was a company owned by Crystal Packaging operating as Crystal Packaging, Inc., dba Hadco Chemical Co at the Cedar Ave. location.

Upon the purchase of Hadco Chemical Co., in 1997 Mr. Gadd and I submitted transfer paperwork to have the establishment number 56149 transferred from Hadco Chemical to Crystal Packaging. My belief is that since we operated as a dba out of the same address for so long that the name transfer was never an issue because there was nothing to trigger an issue. The situation never had a chance to come to the forefront. As far as all were concerned, there was not a problem.

When we started the label updating and gathering of packaging agreements for Ms. Hambrick the whole name issue was triggered by our change of address in 11/05. When we moved to our new facility we had a change of address and started using the Crystal Packaging name for all business conducted since we were no longer at the 'Hadco' location. When we attempted to get the information needed it was brought to our attention that Crystal Packaging was not a recognized name or address and Stepan and Lonza needed official name change verification from EPA. That paperwork could not be found in our records. As a result, we had to go through this name change process with Ms. Kathleen O'Malley from EPA in Washington, D.C. Once that name change and transfer of establishment number was approved, we could then proceed with updating labels and procuring packaging arrangements as Ms. Hambrick and regulations require.

Exhibit A contains a copy of the letter emailed to Ms. O'Malley 9/10/07 with a letter date of 9/5/07. The exhibit also contains a page we received from Stepan noting how to change the company name with a note saying we should receive a confirmation letter in 'about 3 weeks'. Original estimates from Ms. O'Malley were 2-3 weeks as well.

Exhibit B contains a copy of an email and an attachment letter dated 4/14/08 approving the name change and transfer of establishment number. **A process that should have taken approximately 3 weeks actually took 31 weeks, 5 days.** The actual review process, from the information I have from Ms. O'Malley, did not even begin until 2/27/08. On 2/27/08 Ms. O'Malley said she needed the original letter I had emailed her. As instructed I had kept the original from the time of my initial email on 9/10 as she said she would review it and ask for changes if needed. Once that packet was reviewed I could send the original by mail. That letter is submitted as Exhibit C. It was requested 2/27/08, sent 2/28/08 and received 2/29/08 to show our timely response. We later, on 4/9 were requested, via a phone conversation with Ms. O'Malley, to issue a letter concerning the Hadco Chemical name. That letter was faxed as requested on 4/9 and is included in Exhibit C.

We received the original copy of the letter in our offices on 4/22/08. A copy of this letter is included as Exhibit F. We can now forward to both Lonza and Stepan for proof of transfer so we can begin the compliance process. It should be noted that the letter from EPA in the first paragraph is misleading. It makes it appear that we did not issue-

the letter until 3/3/08. That letter was supposed to be under review within 3 weeks from 9/5/07. It didn't get reviewed until 2/27/08. We were told at that time that the sample letter via email was fine and they needed the original. We then sent it on 2/27/08, without changes from the sample letter issued via email on 9/10/07. Their official receipt was on 3/3/08. This was not a delay on our part.

Exhibit D contains copies of email and calendar correspondence and notes. This correspondence shows our efforts to inquire as to why this process was taking so long and if there was anything further required of us to complete the process. This clearly shows that we have made every effort to comply with the requirements, but could not complete the process due to the ridiculous amount of time a simple name change has taken when all the required information was submitted many months ago in direct response to Ms. Hambrick's requirement for compliance.

From February 1997 we had operated, received compliance information, made label changes and conducted general business with our disinfectants, paid our yearly state registration fees and submitted our annual reports under the establishment number 51649 without any issues. If I were to have presented our company as Hadeo Chemical Co. when I requested the information we never would have had a problem. The whole issue stems from our change of address. When we moved and started using Crystal Packaging as our correspondence name when conducting what used to be 'Hadeo Chemical' business the problem came to the forefront. The problem was addressed and now, after an extended period of time, with none of the delay being our fault, the problem has been resolved.

In my opinion, this penalty has been issued as a result of a "disconnect" in communication between Crystal, Region 8 and EPA in Washington D.C.

Exhibit E contains a copy of a letter dated 8/30/08 from Amy Hambrick to me. The letter clearly states that she "understands that we are extensively going through our records and working with registrants to update bulk repackaging agreements, supplemental registration agreements, labels, etc." The letter also states that she "will need to review our updated records **as soon as they are in place.**"

I was to contact her by 10/1/07 to inform her of the progress. Ms. Hambrick and I had a phone conversation sometime between the issuance of that letter and I believe 10/1/07 to talk about the progress and I informed her of our name change issues at that time and also told her I would forward the information when received. As evidenced by our other exhibits, the process has been ongoing and I did not have anything to show her prior to the penalty being imposed, but we continued to work on the project.

As the process is ongoing I have had no other correspondence with Ms. Hambrick. There has also been no other correspondence from Ms. Hambrick since our phone conversation. I was under the assumption that she was aware of what we were doing and she would hear from me when the process was completed. I sincerely do not believe that any one thought this process would take so long. However, we are continuing our efforts to

become compliant. Now that the transfer has been completed, we will get the appropriate information from Lonza and Stepan and keep moving forward.

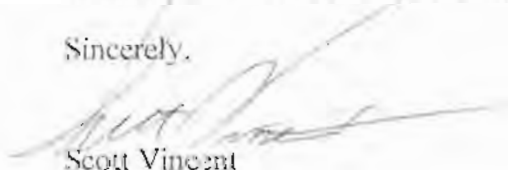
Our response to Counts 1, 2, 3, 4, 5 and 6 is that we could not comply with the requirements due to Washington EPA's failure to act timely and approve our name change and transfer of Establishment #51649. This left us unable to comply in a timely fashion. Washington EPA's failure to act timely has caused Region 8 to issue a penalty to Crystal Packaging, Inc. for non compliance. Compliance was impossible until we worked out the transfer of Establishment number 51649. That transfer was completed 4/14/08, coincidentally 3 days after receipt of your penalty documentation.

While the "disconnect" in communication is unfortunate I don't believe the matter puts Crystal Packaging at fault for noncompliance and I don't believe a penalty is warranted. The name change issue is simply a strange circumstance that has taken a long while to work out due to EPA in Washington D.C's apparent shortage of personnel and heavy workload. I don't think we should pay a penalty for going through the proper channels regardless of the time taken to complete the process. Ms. Hambrick knew about this via our phone conversation to the best of my recollection.

I am anxious to address the issues as well as address any questions you may have in an informal conference as requested. Please contact me with a date for the conference.

In the meantime, if you have any questions, please don't hesitate to contact me.

Sincerely,



Scott Vincent
President

Cc: Scott Hale pc
Dana Stotsky, Senior Enforcement Attorney, U.S. EPA Region 8

CPI

CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

EXHIBIT A

Crystal

CPI

CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

9/5/07

US Environmental Protection Agency
Office of Pesticide Programs
Information Technology and Resources
Management Division
Information Services Branch

Attn: M Kathleen O'Malley
RE: EPA Registration transfer

Ms. O'Malley,

In February of 1997, Crystal Packaging, Inc. via Asset Purchase Agreement purchased Hadco Denver Chemical Company here in Denver, Colorado. At that time we had 2 locations. One at our current address and we maintained the name, facility and address of Hadco and operated the company as Hadco Denver Chemical a separate division within Crystal Packaging. We purchased goods and sold products under the Hadco name.

In November of 2005 we completed construction of a new larger facility at our present address and moved the Hadco operation to the Crystal plant. When that move occurred, we started invoicing and purchasing goods for all Hadco operations under the parent company name, Crystal Packaging, Inc. Now all of our operations are under one roof at one location.

The address and name change has triggered questions by both Stepan and Lonza and they would like proof that the EPA registration numbers issued to Hadco Denver Chemical Company, Facility #56149 have been transferred. Mr. Joseph Gadd, former owner of Hadco Denver Chemical and I filled out transfer paperwork 10 years ago, but apparently they cannot be found. We cannot find them in our archives either.

In order to continue selling our disinfectant and sanitizer products with both Lonza and Stepan, we must show that the transfer has been made with the EPA.

I have been able to contact Mr. Gadd and he has signed the attached transfer agreement. He couldn't have an authorized representative sign the letter because the original office staff has either retired or passed away over the last 10 years, so he has signed the agreement himself.

Crystal[®]

I do need to make some label changes for both Stepan and Lonza, so if you could help me get this transfer completed, I would certainly appreciate it.

If you have any questions, please do not hesitate to contact me at 303-865-7101.

Sincerely,
Scott Vincent
President

A handwritten signature in black ink, appearing to read "Scott Vincent", written over a light gray rectangular background.

TRANSFER AGREEMENT

(Used for transfer of Registrations, Data or Company Ownership)

Reference: 40 CFR § 152.135 and 40 CFR § 152.98

Notification is made this 14th day of August, 2007, by and between the
TRANSFEROR Hadco-Denver Chemical and the
TRANSFeree Crystal Packaging. In
consideration of mutual covenants and agreements made and/or for good and valuable
consideration, the parties agree as follows: [RE: 40CFR§152.135(b)(1)]

1. **PARTIES.** For the purpose of this Agreement, "Parties" shall mean:

a) **TRANSFEROR** (Current Registrant and/or data submitter):

EPA Company Number: 56149

Name: Hadco Denver Chemical Company

Address: 1339 W. Cedar Ave

City: Denver, CO State: CO Zip: 80223

State of Incorporation: Colorado

Name of Authorized Representative: Joseph Gadd

Title of Authorized Representative: President

Original Signature of Authorized Representative: Joseph C Gadd, Jr

Date Signed: Sept. 7, 2007

[RE: 40CFR§152.135(b)(2)]

b) **TRANSFeree** (Company Receiving Registrations and/or data):

EPA Company Number: _____

Name: Crystal Packaging, Inc.

Address: 5185 National Western Dr.

City: Denver State: CO Zip: 80216

State of Incorporation: Colorado

Name of Authorized Representative: Scott Vernejo

Title of Authorized Representative: President

Original Signature of Authorized Representative: [Signature]

Date Signed: 9/7/07

2. **REGISTRATION.** For the purpose of this Agreement, "Registration" shall mean the following EPA registration number(s) and product name(s):

If no registrations put "NONE"

EPA Registration Number	Product Name
<i>see attached sheet</i>	

[RE: 40CFR§152.135(b)(3)]

3. **REGISTRATION ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all right, title and interest in the EPA registrations listed in this document.

[RE: 40CFR§152.135(b)(4)]

4. **DATA ASSIGNMENT.** Transferor does hereby irrevocably transfer to the Transferee all right, title and interest in the items of data named herein. Data that are specifically part of this ASSIGNMENT are listed in APPENDIX A. [If no data then, put "NONE".]

[RE: 40CFR§152.98(b)(3)]

(SEE APPENDIX A)

5. **WARRANTY OF TITLE.** Transferor warrants that it is the lawful owner of the property hereby conveyed and that such property (registrations and/or data) shall not serve as collateral or otherwise secure any loan or other payment arrangement or executory promise, and that the registration(s) shall not revert to the transferor unless a new transfer agreement is submitted to and approved by the Agency.

[RE: 40CFR§152.135(b)(5)]

6. **REASON FOR TRANSFER.** (Describe the general nature of the transaction, e.g. sale, merger, court order etc.—no financial details need to be disclosed).

[RE: 40CFR§152.135(b)(6)]

7. **FALSE STATEMENTS.** The Transferor and Transferee understand that any false statement regarding these documents may be punishable under 18 U.S.C. 1001.

[RE: 40CFR§152.135(b)(7)]

8. **TRANSFeree ACKNOWLEDGEMENT.** Transferee acknowledges that his rights and duties concerning registration under FIFRA and Title 40, Chapter 1 of the Code of federal Regulations will be deemed by EPA to be the same as those of the Transferor at the time the transfer is approved.

[RE: 40CFR§152.135(b)(8)]

TRANSFEROR AFFIRMATION STATEMENT

Reference: 40 CFR § 152.135(c) and 40 CFR § 152.98(b)

The TRANSFEROR Joseph bodd hereby affirms that:

- (1) The person signing the transfer agreement is authorized by the registrant and/or original data submitter to bind the transferor;
- (2) No court order prohibits the transfer, and any required court approvals (if any) have been obtained; and
- (3) The transfer is authorized under all relevant Federal, State and local laws and all relevant corporate charters, bylaws, partnerships, or other agreements.

Joseph C. Bodd, Jr.
[Signature of Transferor's Authorized Representative]

Date: Sept. 7, 2007

[Note: To help prevent fraud, it is preferable that the person signing the affirmation statement be one other than the person signing the transfer agreement.]

Joseph C. Bodd, Jr. President
[Authorized Representative's Name and Title]

[Note: This Affirmation Statement must be notarized.]

NOTARIAL CERTIFICATE

Yicete Ayala

YICETE AYALA
NOTARY PUBLIC
STATE OF COLORADO

My Commission Expires June 14, 2010

SUBSCRIBED & SWORN TO BEFORE ME
THIS 07 DAY OF September, 2007
STATE OF Colorado
COUNTY OF Jefferson
Yicete Ayala
NOTARY PUBLIC
MY COMMISSION EXPIRES June 14, 2010

EPA REGISTRATION NUMBERS TO BE TRANSFERRED
FROM HADCO DENVER CHEMICAL CO TO
CRYSTAL PACKAGING, INC.

EPA #	HADCO LABEL NAME	
1839-95	Mountain Meadow	Stepan
1839-83	Confidence	Stepan
6836-70	Quat Amo	Lonza
6836-169	Pine All 6	Lonza
47371-131	Correct	Lonza
47371-36	Wintergreen II Lemeen	Lonza

**How to Change Your Company Name
and/or
Address With US EPA**

On your company letterhead list your:

1. **EPA Company Number;**
2. **New Company Name:** _____;
3. **New Address:** _____;
4. **Contact Name:** _____;
5. **Phone Number:** _____

Fax this to Ms. Kathleen O'Malley—US EPA @ 703/305-7670
(phone: 703/305-5411)—Do **NOT** mail this!

You will receive a Confirmation Letter from EPA in about 3 weeks with your EPA Company Number.

Scott Vincent

From: Scott Vincent [scott@crystalpackaging.com]
Sent: Monday, September 10, 2007 10:26 AM
To: 'OMalley Kathleen@epamail.epa.gov'
Subject: RE: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)



EPA transfer documents and cov.,

Kathleen,

I've attached a draft letter explaining the reason for transfer as well as the actual transfer documents. Please review and give me any suggestions you deem necessary to make this go smoothly.

Thank you,

Scott Vincent
Crystal Packaging, Inc.
5188 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0170

-----Original Message-----

From: OMalley.Kathleen@epamail.epa.gov [mailto:OMalley.Kathleen@epamail.epa.gov]
Sent: Thursday, September 06, 2007 6:49 AM
To: Scott Vincent
Subject: RE: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Mr. Vincent:

I'll be happy to review both the draft Transfer Agreement and Affirmation Statement first, electronically via e-mail. If no revisions are needed, then the signed, final documents can be sent to me by either regular or courier mail delivery. Please see the Address document near the end of the Transfer package in the PDF file that I sent to you.

Regards,

Kathleen O'Malley

M. Kathleen O'Malley, Program Analyst
E(s) (2) Team & Transfer Staff
US Environmental Protection Agency
Office of Pesticide Programs
Information Technology & Resources
Management Division
Information Services Branch
RM. 5-6310, Potomac Yard One
PH: (703) 305-5411
FAX: (703) 305-7670
E-Mail: OMalley.Kathleen@epa.gov

"Scott Vincent"
<scott@crystalpa
ckaging.com>

09/01/2007 08:23
PM

Kathleen O'Malley/DC/USEPA/US@EPA
cc

Subject
RE: Sample Transfer Package for
Change of Ownership Request FROM
Madco Chemical Company TO Crystal
Packaging, Inc. (EPA Company
Number 56149)

Ms. O'Malley,

I was finally able to get in touch with the previous owner of Madco Denver Chemical. I'm assuming you'll want me to get the signature required on the transfer documents? He is available to sign these this week. Once I've got that I was going to draft a letter as you had requested to get the transfer completed.

Is there anything else I need to do in order to complete the process? Please call me if you have any questions.

Thank you,

Scott Vincent
Crystal Packaging, Inc.
5185 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0170

-----Original Message-----

From: O'Malley, Kathleen@epamail.epa.gov [mailto:O'Malley, Kathleen@epamail.epa.gov]
Sent: Monday, August 13, 2007 10:46 AM
To: Scott Vincent
Subject: FW: Sample Transfer Package for Change of Ownership Request FROM Madco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Scott:

Many thanks for your time this morning in order to give me some additional background concerning your request. As we discussed, I am sending a template package that you may use to finalize this change of ownership. I'll be glad to take a look at your completed draft for adequacy, before it is submitted to my office for approval.

(See attached file: Transfer_Sample_Agreement_and_Affirmation copy2.doc)

Please feel free to call any time through this process. I look forward to working with you.

Best Regards,

Kathleen

M. Kathleen O'Malley, Program Analyst
EPA/12) Team & Transfer Staff
US Environmental Protection Agency
Office of Pesticide Programs

Information Technology & Resources
Management Division
Information Services Branch
RM. 5-6318, Potomac Yard One
PH: (703) 305-5411
FAX: (703) 305-7670
E-Mail: OMalley.Kathleen@epa.gov

CPI

CRYSTAL PACKAGING, INC.

5185 National Western Dr

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

EXHIBIT B

Crystal

Scott Vincent

From: OMalley.Kathleen@epamail.epa.gov
Sent: Wednesday, April 16, 2008 3:30 PM
To: Scott Vincent
Subject: Advance Notification – Approval of Company Ownership Change for Company Number 56149
Hadco Denver Chemical Company TO Crystal Packaging, Inc



56149_COM_56149_4_14_08.pdf (1..

Mr. Vincent:

I am providing you with an early copy of our notification to you. The letter will be mailed tomorrow morning:

(See attached file: 56149_COM_56149_4_14_08.pdf)

Best Regards,

Kathleen

M. Kathleen O'Malley, Program Analyst
6(a)(2) Team & Transfer Staff
US Environmental Protection Agency
Office of Pesticide Programs
Information Technology & Resources
Management Division
Information Services Branch
RM. S-6318, Potomac Yard One
PH: (703) 305-5411
FAX: (703) 305-7670
E-Mail: OMalley.Kathleen@epa.gov



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

April 14, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

C. SCOTT VINCENT
CRYSTAL PACKAGING, INC.
5185 NATIONAL WESTERN DRIVE
DENVER, CO 80216

Dear Registrant:

Subject: Change of Name and Ownership of Company Number 56149

Pursuant to your letter and agreement of September 5, 2007 which was received by the Agency on March 3, 2008 and subsequent information received on April 9, 2008 and April 14, 2008, we have approved the change in name and ownership of HADCO DENVER CHEMICAL COMPANY company number 56149.

Our records are being amended to show the registrant under company number 56149 as follows:

C. SCOTT VINCENT
CRYSTAL PACKAGING, INC.
5185 NATIONAL WESTERN DRIVE
DENVER, CO 80216

The effective date of this change is the date of this letter.

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form

"Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

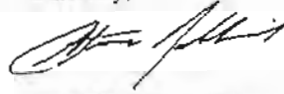
In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Kathleen O'Malley at (703) 305-5411.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology and Resources Management Div. (7504P)
Office of Pesticide Programs

cc: MR. JOSEPH GADD
HADCO DENVER CHEMICAL CO.
1339 WEST CEDAR AVE.
DENVER, CO 80223

REF: 56149_COM_56149



CPI

CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• *Blending* • *Packaging* • *House brands* • *Private label* • *Contract packaging*

EXHIBIT C

Crystal



CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303 778 1805 • Fax: 303 778 0170 • info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

2/28/08

Document Processing Desk (XFER)
US EPA (7502P)
1200 Pennsylvania Ave, NW
Washington, DC 20460-0001

Attn: M. Kathleen O'Malley

Ms. O'Malley,

Enclosed please find original documentation for our transfer request as you have requested. I appreciate your phone call of 2/27 stating that you will give this a priority status since it has been 5 months now

If you should have any questions or concerns, please call me at 303-865-7101.

Thank you again for your assistance.

Sincerely,
Scott Vincent
President

(3/3/08)

hand off to EPA (delivered 2/27/08)
see note on file dated 2/27/08

See note on file dated 2/27/08

5185 National Western Dr
Denver CO 80216
303-865-7101 FAX 303-776-0170

**CRYSTAL
PACKAGING, INC.**

Fax

FAXED

APR 09 2008

To: US EPA Attn: Kathleen O'Malley	From: SCOTT VINCENT
Fax: 703-305-7670	Pages: 2
Phone: 703-305-5411	Date: 4/9/2008
Re: Transfer	CC:

Urgent **For Review** **Please Comment** **Please Reply** **Please Recycle**

Kathleen,

Following is the letter you have requested. Please call me with any questions you may have.

Thank you,

Scott Vincent

President





CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303-778-1805 • Fax: 303-778-0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

4/9/08

Document Processing Desk (XFER)
US EPA (7502P)
1200 Pennsylvania Ave NW
Washington, DC 20460-0001

Attn: Kathleen O'Malley

Kathleen,

Pursuant to our conversation of this morning and to our letter to you of 9/5/07 I'd like to reiterate the following information.

In reference to the transferring company name; your records reflect "Hadco Chemical Company". Please use this letter as confirmation that the officially the company had a name change at a point in time to "Hadco Denver Chemical Company". This is the company that Crystal Packaging, Inc. purchased in February of 1997. They are one and the same, but the name was changed.

Also, to confirm, the reason for transfer is that Crystal Packaging, Inc. purchased Hadco Denver Chemical Company in February of 1997 as a company consolidation.

If you have any questions, please don't hesitate to contact me at 303-865-7101.

Sincerely,
Scott Vincent
President

Date/Time: Apr. 9, 2008 10:42AM

File	Destination	Page	Result
7374 Memory TX	17033057670	2	OK

Reason for error:

- 1) Hang up or line fall
- 2) No answer
- 3) Exceeded max. e-mail size

Reason for error:

- 2) Busy
- 4) No facsimile connection

5155 National Western Dr.
Denver, CO 80216
303-485-7101 FAX 303-779-0170

**CRYSTAL
PACKAGING, INC.**

Fax

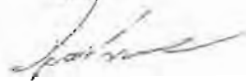
FAXED
APR 09 2008

To: US EPA Attn: Kathleen O'Malley From: SCOTT VINCENT
 Fax: 703-325-7670 Pages: 2
 Phone: 703-325-6411 Date: 4/9/2008
 Re: Transfer CC:

Urgent For Review Please Comment Please Reply Please Recycle

Kathleen,
 Following is the info you have requested. Please call me with any questions you may have.

Thank you,
 Scott Vincent
 President



CPI

CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

EXHIBIT D

Crystal

Amy

From: Bruce Greene [bgreene@stepan.com]
Sent: Friday, July 20, 2007 11:23 AM
To: Amy
Cc: John Vaughn
Subject: Re: FW: NEW Subregn Pkgs for CRYSTAL PACKAGING, INC for 1839-95 and 83



LBL-083-061407.doc (60 KB)
LBL-095-061407.doc (83 KB)
How to Change
our Company Nam.

Amy:

Here is that information I was speaking about earlier.
(See attached file: LBL-083-061407.doc) (See attached file: LBL-095-061407.doc) (See
attached file: How to Change Your Company Name or
Address.01-11-07.doc)

Bruce L. Greene
Product Registration Specialist
Stepan Company
22 W. Frontage Rd.
Northfield, IL 60093
Direct Tel.: 847-501-2329
Fax: 847-501-2459
Email: bgreene@stepan.com

"Amy"
<amy@CrystalPackaging.com>
07/20/2007 10:59
AM

<bgreene@stepan.com> To
cc
Subject
FW: NEW Subregn Pkgs for CRYSTAL
PACKAGING, INC. for 1839-95 and 83

Good morning, Bruce. Since I haven't heard from you, I'm sending this email again. I have attached the 3 labels that we have for your products. If you would be so kind as to look them over and give me corrections, I'd appreciate it.

Amy L. Hawke
Accountant
Crystal Packaging

-----Original Message-----

From: Amy
Sent: Tuesday, July 10, 2007 2:34 PM
To: 'bgreene@stepan.com'

Cc: Scott Vincent
Subject: RE: NEW Subregn pkgs for CRYSTAL PACKAGING, INC. for 1839-95 and 83

Good day, Bruce. My name is Amy Hawke. Scott has given me the project of getting together all the information you need for us to be the subregistrant for Stepen. After I get Scott to sign your attached documentation, what would you need from me? I'd just like to say that this is something new for me to do, so I'd appreciate any and all assistance you can give.

Sincerely,
Amy L Hawke
Accountant
Crystal Packaging
phone: 303-865-7105

Amy

Subject: CALL KATHLEEN O'MALLEY FOR STATUS

Start: Wed 10/10/2007 12:00 AM

End: Thu 10/11/2007 12:00 AM

Show Time As: Free

Recurrence: (none)

Called Ms O'Malley She says it should be 2 weeks.

Amy

Subject: Call Kathleen O'malley
Start: Mon 11/5/2007 12:00 AM
End: Tue 11/6/2007 12:00 AM
Show Time As: Free
Recurrence: (none)

Called Ms O'Malley. She said it would be 2 weeks

Amy

Subject: Call Kathleen O'malley
Start: Wed 12/5/2007 12:00 AM
End: Thu 12/6/2007 12:00 AM
Show Time As: Free
Recurrence: (none)

Called Left message.

Amy

Subject: Call Kathleen O'malley

Start: Mon 1/7/2008 12:00 AM

End: Tue 1/8/2008 12:00 AM

Show Time As: Free

Recurrence: (none)

Called - Left Message.

Kathleen called and said that it would be 2 weeks. I made mention that she'd been telling me that for months now. She said that due to staff shortages they are doing the best that they can.

Scott Vincent

From: Scott Vincent [scott@crystalpackaging.com]
Sent: Tuesday, February 26, 2008 5:35 PM
To: 'omalley.kathleen@epamail.epa.gov'
Subject: NEED YOUR HELP

Importance: High



EPA transfer
documents and cov.,

Ms. O'malley,

Would you please extend to me the courtesy of a phone call and give me the status of our registration transfer noted below. This was submitted on 9/10/07 and we have been told "2 more weeks" on many occasions.

I need to know what I need to do to get this resolved. If a transfer is something that's too difficult, can I get a new EPA #? I have to bring all of our labels up to date anyway and have the registrations with the manufacturers renewed because I can't come into compliance until you approve the transfer.

With all due respect, I think I deserve some kind of response from you. It's been 5 months! If you can't reach me below, please feel free to call me on my cell at 303-901-6720.

Sincerely,

Scott Vincent
Crystal Packaging, Inc.
5185 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0170

-----Original Message-----

From: Scott Vincent
Sent: Tuesday, January 22, 2008 9:40 AM
To: 'omalley.kathleen@epamail.epa.gov'
Cc: Amy
Subject: FW: Sample Transfer Package for Change of Ownership Request FROM Hados Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Kathleen,

The document attached was submitted to you on 9/10/07; over 4 months ago. I understand that you are busy but I need to be able to sell our products and cannot until this issue is addressed. Please let me know the status.

This transfer should be smooth as you have the signature of both owners and there shouldn't be any questions. If there are, please call me to discuss.

Thank you,

Scott Vincent
Crystal Packaging, Inc.
5185 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0170

-----Original Message-----

From: Scott Vincent [mailto:scott@crystalpackaging.com]
Sent: Monday, September 10, 2007 10:26 AM
To: 'OMalley.Kathleen@epamail.epa.gov'
Subject: RE: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Kathleen,

I've attached a draft letter explaining the reason for transfer as well as the actual transfer documents. Please review and give me any suggestions you deem necessary to make this go smoothly.

Thank you,

Scott Vincent
Crystal Packaging, Inc.
5185 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0173

-----Original Message-----

From: O'Malley.Kathleen@epamail.epa.gov [mailto:O'Malley.Kathleen@epamail.epa.gov]
Sent: Thursday, September 06, 2007 8:49 AM
To: Scott Vincent
Subject: RE: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Mr. Vincent:

I'll be happy to review both the draft Transfer Agreement and Affirmation Statement first, electronically via e-mail. If no revisions are needed, then the signed, final documents can be sent to me by either regular or courier mail delivery. Please see the Address document near the end of the Transfer package in the PDF file that I sent to you.

Regards,

Kathleen O'Malley

M. Kathleen O'Malley, Program Analyst
6(a)(2) Team & Transfer Staff
US Environmental Protection Agency
Office of Pesticide Programs
Information Technology & Resources
Management Division
Information Services Branch
RM. S-6318, Potomac Yard One
PH: (703) 305-5411
FAX: (703) 305-7670
E-Mail: O'Malley.Kathleen@epa.gov

"Scott Vincent"
<scott@crystalpa
ckaging.com>

09/10/2007 06:23
PM

Kathleen O'Malley/DC/USEPA/USOEPA

Subject
RE: Sample Transfer Package for
Change of Ownership Request FROM
Hadco Chemical Company TO Crystal

9/5/07

Packaging, Inc. (EPA Company
Number 56148)

Ms. OMalley,

I was finally able to get in touch with the previous owner of Hadco Denver Chemical. I'm assuming you'll want me to get the signature required on the transfer documents? He is available to sign those this week. Once I've got that I was going to draft a letter as you had requested to get the transfer completed.

Is there anything else I need to do in order to complete the process? Please call me if you have any questions.

Thank you,

Scott Vincent
Crystal Packaging, Inc.
5185 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0170

-----Original Message-----

From: OMalley, Kathleen@epamail.epa.gov [mailto:OMalley, Kathleen@epamail.epa.gov]
Sent: Monday, August 13, 2007 10:46 AM
To: Scott Vincent
Subject: FW: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Scott:

Many thanks for your time this morning in order to give me some additional background concerning your request. As we discussed, I am sending a template package that you may use to finalize this change of ownership. I'll be glad to take a look at your completed draft for adequacy, before it is submitted to my office for approval.

(See attached file: Transfer_Sample_Agreement_and_Affirmation_copy2.doc)

Please feel free to call any time through this process. I look forward to working with you.

Best Regards,

Kathleen

M. Kathleen O'Malley, Program Analyst
6(a)(1) Team & Transfer Staff
US Environmental Protection Agency
Office of Pesticide Programs
Information Technology & Resources
Management Division
Information Services Branch
RM. 3-6318, Potomac Yard One
PH: (703) 305-5411
FAX: (703) 305-7676
E-Mail: OMalley, Kathleen@epa.gov

Scott Vincent

From: Amy
Sent: Friday, October 12, 2007 1:53 PM
To: Scott Vincent
Subject: RE: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Scott,
She is out of her office until Monday. I left her a message to call me when

Amy L Hawke
Accountant
Crystal Packaging

-----Original Message-----

From: Scott Vincent
Sent: Friday, October 12, 2007 1:41 PM
To: Amy
Subject: FW: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

Scott Vincent
Crystal Packaging, Inc.
5185 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0170

Scott Vincent

From: Amy
Sent: Tuesday, October 23, 2007 9:27 AM
To: Scott Vincent
Subject: RE: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

The status of our transfer is that it is in review. We shall find out shortly. The back up on this is the fact that there are only 2 people in the office, and they seem to have had an influx of transfers lately. Kathleen said that she would keep us updated on the status, and as soon as it was approved, she would send us a letter electronically to be followed up with the mailed copy.

Amy L Hawke
Accountant
Crystal Packaging

Scott Vincent

From: Amy
Sent: Wednesday, October 17, 2007 9:55 AM
To: Scott Vincent
Subject: RE: Sample Transfer Package for Change of Ownership Request FROM Hadco Chemical Company TO Crystal Packaging, Inc. (EPA Company Number 56149)

I just tried her again, and she's out today. I left another message. I'll try again tomorrow.

Amy L Hawke
Accountant
Crystal Packaging

Amy

Subject: Call Kathleen O'malley

Start: Wed 2/27/2008 10:00 AM

End: Wed 2/27/2008 10:30 AM

Recurrence: (none)

Called Ms O'malley. She said that we didn't send original documentation, so she can't go further with it. We will send this priority mail. She said that she would give us a priority.

2/27/08 Kathleen told me - I was told to review the documents and to be sure to send the original documents. She said that she would give us a priority. She said that she would give us a priority.

It's not that we didn't send it by mail, it's that we've been waiting for her to review the email version (essentially the same) so she could tell us that it was ok to send the original via mail.

Original version emailed 9/10/07

Originals sent overnight 2/16/08

Amy

Subject: Call Kathleen O'malley

Start: Thu 3/6/2008 12:00 PM

End: Thu 3/6/2008 12:30 PM

Recurrence: (none)

Called Ms O'malley. She received documentation. Has sent it on to her colleague for second review.

Scott Vincent

From: Amy
Sent: Tuesday, April 08, 2008 3:24 PM
To: Scott Vincent
Subject: Kathleen O'Malley

I left her another voicemail. She should be in the office through Thursday. She will be out on Friday. I shall attempt to call her again tomorrow. I'll let you know as soon as I've spoken with her

Amy L. Hawke
Accountant
Crystal Packaging

Scott Vincent

From: Scott Vincent
Sent: Monday, April 14, 2008 1:12 PM
To: Vaughn.Louis@epamail.epa.gov
Cc: Amy
Subject: RE: Transfer from Hadco Chemical to Crystal Packaging

Thank you so much for getting back with me.

Regarding question #1. Yes, this is what we wish to do. From my understanding with Lonza and Stepan, they will not honor the establishment # under Hadco Denver Chemical and need for Crystal Packaging to have the correct establishment # so we can continue to receive important updates to formula and labeling of those registered products.

Regarding question #2. Yes, you are correct. We were registered to repackage those formulations belonging to Lonza and Stepan and we do not own any Section 3 EPA registration numbers.

Please call me at the below number if you have any questions.

Thank you,

Scott Vincent
Crystal Packaging, Inc.
5185 National Western Dr.
Denver, CO 80216
Phone: 303-865-7101
Fax: 303-778-0170

-----Original Message-----

From: Vaughn.Louis@epamail.epa.gov [mailto:Vaughn.Louis@epamail.epa.gov]
Sent: Monday, April 14, 2008 1:00 PM
To: Scott Vincent; Amy
Cc: D'Malley.Kathleen@epamail.epa.gov
Subject: Transfer from Hadco Chemical to Crystal Packaging

I am Kathleen D'Malley's coworker. We work together on transfers. As part of an internal peer review I reviewed your request for Company Ownership transfer of EPA company number 56149.

It is my understanding that you thought that you had transferred this EPA company number in 1997 but, somehow the process was not completed. You wish to complete it now.

I am a bit confused by the list of Section 3 Product registrations that you attached (see attachment) where the title of the list is, "EPA Registration Numbers To Be Transferred From Hadco Denver Chemical Co. To Crystal Packaging, Inc.". This list shows Section 3 EPA Registration numbers registered to Stepan Company, Lonza Inc. and H&S Chemicals Division of Lonza Inc. Also, the third paragraph of your letter to Ms. O'Malley dated September 9, 2007 states that you need, "proof that registration numbers issued to Hadco Denver Chemical Company, Facility #56149, have been transferred." Our records show that none of these registrations belong to Hadco Denver Chemical Company or to Crystal Packaging Inc. Could it be that these are products that you distribute under other product names?

I have a couple of questions:

(1) Am I correct that all you wish to accomplish is to transfer EPA company number 56149 from Hadco Denver Chemical Company to Crystal Packaging Inc.?

(2) Am I correct that you currently own no Section 3 EPA registrations? Rather, you are a

CPI

CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

EXHIBIT E

Crystal



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8ENF-UFO

AUG 30 2007

Scott Vincent, President
Crystal Packaging
5185 National Western Drive
Denver, CO 80239

RE: Inspection Follow Up

Dear Mr. Vincent:

I wanted to follow up with you in regards to the inspection I conducted at your facility on May 18, 2007. During our negotiation settlement of Crystal Packaging's late 2006 pesticide production report, we discussed Crystal Packaging's missing bulk repackaging agreements and supplement registration agreements as well as some label discrepancies. I am aware that you are extensively going through your records and working with the registrants of the products you sell to update bulk repackaging agreements, supplemental registration agreements, labels, etc. I wanted to remind you that I will need to review your updated records as soon as they are in place.

Please contact me by October 1, 2007 to inform me of this progress and submit any updated records that are in place. If you have any questions or concerns, please contact me at 303-312-6883.

Sincerely,

Amy Hambrick
Enforcement Officer
EPA Region 8

Enclosed: 40 Code of Federal Regulations Part 169, Record Keeping Requirements



Printed on Recycled Paper



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

May 3, 2007

REF: 8ENF-IJ

Mr. Scott Vincent, President
Crystal Packaging, Inc.
5185 National Western Drive
Denver, Colorado 80216

Dear Mr. Vincent:

I have received your 2006 pesticide report and made the requested company name and address changes in our database; this should help eliminate late reporting next year. If you have further changes in your company name or the need for additional establishment numbers, please contact me.

Sincerely,

Kathleen R. Craig, EPS
Policy, Information Management and
Environmental Justice Program
(303) 312-6049
Craig.kathleen@epa.gov

7/07
This done - 7/2/07
with this 7/17/07?

Cc: Amy Hambrick



CPI

CRYSTAL PACKAGING, INC.

5185 National Western Dr.

Denver, Colorado, 80216

Phone: 303.778.1805 • Fax: 303.778.0170 • Info@crystalpackaging.com



• Blending • Packaging • House brands • Private label • Contract packaging

EXHIBIT F

Crystal



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

April 14, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

C. SCOTT VINCENT
CRYSTAL PACKAGING, INC.
5185 NATIONAL WESTERN DRIVE
DENVER, CO 80216

Dear Registrant:

Subject: Change of Name and Ownership of Company Number 56149

Pursuant to your letter and agreement of September 5, 2007 which was received by the Agency on March 3, 2008 and subsequent information received on April 9, 2008 and April 14, 2008, we have approved the change in name and ownership of **HADCO DENVER CHEMICAL COMPANY** company number **56149**.

Our records are being amended to show the registrant under company number **56149** as follows:

C. SCOTT VINCENT
CRYSTAL PACKAGING, INC.
5185 NATIONAL WESTERN DRIVE
DENVER, CO 80216

The effective date of this change is the date of this letter.

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form

"Notice of Supplemental Distribution of a Registered Pesticide Product." EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

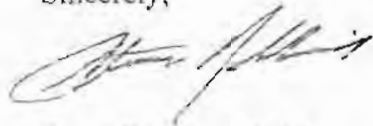
In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Kathleen O'Malley at (705) 305-5411.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology and Resources Management Div. (7504P)
Office of Pesticide Programs

cc: MR. JOSEPH GADD
HADCO DENVER CHEMICAL CO.
1339 WEST CEDAR AVE.
DENVER, CO 80223

REF: 56149_COM_56149