



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

September 01, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DR. FRANK SOBOTKA
IPM RESOURCES LLC, AGENT FOR
GHARDA CHEMICALS INTERNATIONAL INC.
4932 CROCKERS LAKE BLVD. SUITE 818
SARASOTA, FL 34238

Dear Dr. Sobotka:

Subject: Transfer of Pesticide Registrations From Company Number **33658** to
Company Number **93182**

Pursuant to your request in your letter and transfer agreement of July 05, 2017, we have approved the transfer of the following registrations from GHARDA CHEMICALS LIMITED, company number 33658 to GHARDA CHEMICALS INTERNATIONAL INC., company number 93182.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
GHARDA DICAMBA TECHNICAL HERBICIDE	33658-12	93182-1
GHARDA DICAMBA K SALT MANUFACTURING CONCENTRATE	33658-15	93182-2
CHLORPYRIFOS TECHNICAL	33658-17	93182-3
GHARDA DICAMBA DMA MANUFACTURING CONCENTRATE	33658-19	93182-4
GHARDA PERMETHRIN TECHNICAL	33658-20	93182-5
GHARDA DICAMBA K MANUFACTURING CONCENTRATE	33658-24	93182-6
PILOT 4E CHLORPYRIFOS AGRICULTURAL INSECTICIDE	33658-26	93182-7
PILOT 15G CHLORPYRIFOS AGRICULTURAL INSECTICIDE	33658-27	93182-8
GHARDA DIMETHYLAMINE SALT OF DICAMBA	33658-29	93182-9

ORACLE DICAMBA AGRICULTURAL HERBICIDE	33658-30	93182-10
STRATOS DICAMBA+ATRAZINE AGRICULTURAL HERBICIDE	33658-31	93182-11
GHARDA DICAMBA + 2,4-D DMA HERBICIDE	33658-32	93182-12
REALITY TERMITICIDE/INSECTICIDE	33658-33	93182-13
GHARDA FIPRONIL TECHNICAL	33658-34	93182-14
GHARDA DICAMBA SODIUM	33658-35	93182-15
G7840 MANUFACTURING USE CONCENTRATE	33658-36	93182-16
GHARDA TRICLOPYR ACID TECHNICAL	33658-37	93182-17
GHARDA TRICLOPYR BUTOXYETHYL ESTER TECHNICAL	33658-38	93182-18
GHARDA DICAMBA SODIUM MUP 70%	33658-39	93182-19
G7880 MANUFACTURING USE CONCENTRATE	33658-40	93182-20

<u>SLN Number</u>	<u>Old Registrant/ Company Number</u>	<u>New Registrant/ Company Number</u>
MS040007	33658	93182

You may continue to sell and distribute existing product stocks, bearing the transferor's label, for 18 months. Each product container or package bearing the transferor's label, which is sold or distributed 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. As of the effective date of this transfer, any newly produced product must bear the new Company designation, new EPA Registration Number and new Establishment Number (if it has changed).

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 distribution or sale of the product containing the new registration number. 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.

With 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 annual maintenance fee is 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, please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: DR. FRANK E. SOBOTKA
IPM RESOURCES LLC, AGENT FOR
GHARDA CHEMICALS LIMITED
4032 CROCKERS LAKE BLVD., STE 818
SARASOTA, FL 34238

RE: L_33658_REG_93182_09_01_2017