BIOLOGIC INC.
agribusiness professionals

January 30, 2014

Mr. Kable Bo Davis
Product Manager, PM Team 25
Herbicide Branch; Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Arial Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

SUBJECT: Registration Application for "Propanil Technical"; EPA Reg. No. 90188-(to be assigned). Submitted on behalf of ProNil, LLC.

Dear Mr. Davis:

With this letter, please find the following enclosed items submitted on behalf of ProNil, LLC in support of its registration application for "Propanil Technical":

Volume One – Administrative Materials

- ✓ Application for Pesticide Registration; (EPA Form 8570-1)
- ✓ Data Matrix; (EPA Form 8570-35)
- ✓ EPA Confidential Statement of Formula; (EPA Form 8570-4)
- ✓ Certification with Respect to Citation of Data; (EPA Form 8570-34)
- ✓ Five (5) copies of draft labeling

Volume Two – Manufacturing Process

49309901

Product Identity and Composition of Propanil TGAI: Selected Studies to Fulfill OPPTS Guideline Series 830 in Accordance with 40 CFR Parts 158.155, 158.160, 158.162 and 158.167: Description of Materials to Produce the Product; Description of Production Process; Discussion of Formation of Impurities; and Certified Limits. OPPTS Guidelines 830.1550, 830.1600, 830.1620, 830.1670 and 830.1750. Project I.D. No. TOC-PRP-830.

Volume Three – Preliminary Analysis and Part B Product Properties

49309902

Determination of Physical and Chemical Characteristics and Preliminary Analysis of Technical Propanil. OPPTS Guidelines 830.1700, 830.1750, 830.1800, 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.7000, 830.7050, 830.7200, 830.7300, 830.7370, 830.7550 and 830.7840. Project I.D. No. 533G406

115 Obtuse Hill • Brookfield, Connecticut 06804 • USA
Voice: 203.740.1200 • Fax: 203.740.1220 • Email: lmiller@biologicconsulting.com

Please be advised that this application is supported by the cite-all option in accordance with FIFRA 3(c)(1)(D) and offer to pay letters have been submitted to all companies listed under propanil on the September 25, 2013 Data Submitters List. Furthermore, the subject product is substantially similar in composition and labeling to "RiceCo Propanil Technical"; EPA Reg. No. 71085-1.

This registration action falls within the PRIA category as stated in Table 4 – Registration Division: New Products. This action is further defined under EPA No. R333; CR No. 52 as a "New Product" "MUP" "Unregistered Source of Active Ingredient". The PRIA fee for this registration action is, therefore, $18,893.00 and the decision time frame is ten months. A copy of the receipt indicating this PRIA fee has been paid is included.

Should you have any questions or otherwise wish to reach me, please feel free to contact my office at (203) 740-1200.

Sincerely,

Lawrence A. Miller
Principal
Regulatory Agent for ProNil, LLC

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.
Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number ProNil, LLC c/o Biologic Consulting, Inc. 115 Obtuse Hill Road Brookfield, CT 06804	EPA Registration Number/File Symbol 90188-X
Active Ingredient(s) and/or representative test compound(s) Propanil	Date January 30, 2014
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food	Product Name Propanil Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☑ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to Jetermine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

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

Signature	Date	Typed or Printed Name and Title
	Jan. 30, 2014	Jane M. Miller, Agent

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

February 11, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

JANE M. MILLER
PRONIL, LLC
115 OBTUSE HILL ROAD
BROOKFIELD, CT 06804

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 03-FEB-14. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 947063 Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: Yes No

Application Type: New Registration

Fee For Service: Yes No

Billable: Yes No

Company: 90188 PRONIL, LLC

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 25

Product #: **90188-R** Product Name: PROPANIL TECHNICAL

Override#:

Me Too Section3: 71085-1 Me Too Product Name: RICECO PROPANIL TECHNICAL

Application Date: 30-Jan-2014

OPP Rec'vd Date: 03-Feb-2014

Front End Date: 03-Feb-2014

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Content	
Study	
CSF	

Fast Track: New Ingredient:

View/Edit

Receipt Description:

Application for registration of new MUP product

New Ingredient Request Date:

New Ingredient Received Date:

Form A: Signature Date: Form B: Signature Date:

Please read instructions on reverse before [illegible]leting form. Form App[illegible], OMB No. 2070-0060, Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

[✓] Registration
[ ] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 90188-X	2. EPA Product Manager K. Davis	3. Proposed Classification [✓] None [ ] Restricted
4. Company/Product (Name) Propanil Technical	PM# 25	
5. Name and Address of Applicant *(Include ZIP Code)* ProNil, LLC c/o Biologic Consulting, Inc. 115 Obtuse Hill Road Brookfield, CT 06804 [ ] *Check if this is a new address*	6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 71085-1 Product Name RiceCo Propanil Technical	

Section - II

[ ] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in repsonse to Agency letter dated _____
[ ] "Me Too" Application.
[✓] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is an application for a new pesticide MUP product. This action will fall within the category on Table 4 - Registration Division: New Products, EPA No. R333; CR No. 52. The PRIA fee for this application is $18,893.

Contact: Jane Miller at email: jmiller@biologicconsulting.com

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [✓] No	[ ] Yes [✓] No	[ ] Yes [✓] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [✓] Other (Specify) Poly bulk bags
**** Certification must be submitted***	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information [✓] Label [ ] Container	4. Size(s) Retail Container 500 kg. (1102.3 lbs.)	5. Location of Label Directions [✓] on label

6. Manner in Which Label is Affixed to Product [✓] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

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

Name	Title	Telephone No. (Include Area Code)
Jane M. Miller	Agent	203-740-1200

Certification

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

6. Date Application Received **(Stamped)**

2. Signature [signature]	3. Title Agent
4. Typed Name Jane M. Miller	5. Date January 30,2014

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Based on Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date January 30, 2014			EPA Reg. No./File Symbol 90188-X		Page 1 of 5
Applicant's/Registrant's Name & Address			Product:		
ProNil, LLC c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Propanil Technical		
Ingredient Propanil					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition		PRONIL, LLC	Own	
830.1600	Description of Materials Used to Produce the Product		PRONIL, LLC	Own	
830.1620	Description of Production Process		PRONIL, LLC	Own	
830-X650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities		PRONIL, LLC	Own	
830.1700	Preliminary Analysis		PRONIL, LLC	Own	
830.1750	Certified Limits		PRONIL, LLC	Own	
830.1800	Enforcement Analytical Method		PRONIL, LLC	Own	
830.1900	Submittal of Samples				2
830.6302	Color		PRONIL, LLC	Own	
830.6303	Physical State		PRONIL, LLC	Own	
830.6304	Odor		PRONIL, LLC	Own	
830.6313	Stability to normal & elevated temp., metal, metal ion		PRONIL, LLC	Own	
830.6314	Oxidation/Reduction		PRONIL, LLC	Own	
830.6315	Flammability / Flame Extension				3
830.6316	Explodability				4
830.6317	Storage Stability				5
Signature			Name and Title		Date
Jane M Miller			Jane M. Miller, Agent		01/30/2014

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DATA MATRIX

Date January 30, 2014			EPA Reg. No./File Symbol 90188-X		Page 2 of 5
Applicant's/Registrant's Name & Address			Product		
ProNil, LLC c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Propanil Technical		
Ingredient Propanil					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				6
830.6320	Corrosion Characteristics				7
830.6321	Dielectric Breakdown Voltage				8
830.7000	pH		PRONIL, LLC	Own	
830.7050	UV/Visible Spectrum		PRONIL, LLC	Own	
830.7100	Viscosity				9
830.7200	Melting Point/ Melting Range		PRONIL, LLC	Own	
830.7300	Density		PRONIL, LLC	Own	
830.7370	Dissociation Constant		PRONIL, LLC	Own	
830.7570	Octanol/Water Partition Coefficient		PRONIL, LLC	Own	
830.7840	Water Solubility		PRONIL, LLC	Own	
830.7950	Vapor Pressure				10
870.1100	Acute Oral Toxicity	CITE-ALL		PAY	
870.1200	Acute Dermal Toxicity	CITE-ALL		PAY	
870.1300	Acute Inhalation Toxicity	CITE-ALL		PAY	
870.2400	Acute Eye Irritation	CITE-ALL		PAY	
870.2500	Acute Dermal Irritation	CITE-ALL		PAY	
Signature			Name and Title		Date
Jane M Miller			Jane M. Miller, Agent		01/30/2014

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DATA MATRIX

Date January 30, 2014			EPA Reg. No./File Symbol 90188-X		Page 3 of 5
Applicant's/Registrant's Name & Address			Product:		
ProNil, LLC c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Propanil Technical		
Ingredient Propanil					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.2600	Skin Sensitization			PAY	
Remaining data requirements including Acute Toxicity, Ecological Effects, Environmental Fate, and all other generic data requirements required for Agricultural uses, including task forces.		CITE-ALL		PAY	
The following companies have been sent Offer to Pay letters:			E.I. DuPont De Nemours	Pay	
			Wilmington, DE		
			Monsanto Company	Pay	
			Washington, DC		
			Drexel Chemical Company	Pay	
			Memphis, TN		
			Propanil Task Force	Pay	
			Washington, DC		
			Spray Drift Task Force	Pay	
			Washington, DC		
			United Phosphorus Inc.	Pay	
			King of Prussia, PA		
			RiceCo	Pay	
			Memphis, TN		
Signature			Name and Title		Date
Jane M. Miller			Jane M. Miller, Agent		01/30/2014

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DATA MATRIX

Date January 30, 2014			EPA Reg. No./File Symbol 90188-X		Page 4 of 5
Applicant's/Registrant's Name & Address ProNil, LLC c/o Biologic, Inc. 115 Obtuse Hill Road Brookfield, CT 06804			Product **Propanil Technical**		
Ingredient Propanil					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	CITE-ALL		Outdoor Residential Exposure TF	PAY	
			Washington, DC		
			Agricultural Reentry Task Force	PAY	
			Washington, DC		
			FIFRA Endangered Species TF	PAY	
			Washington, DC		
			Agricultural Handler Exposure TF	PAY	
			Macon, MO		
			Propanil Task Force II	PAY	
			Washington, DC		
			Generic Endangered Species TF	PAY	
			Gig Harbor, WA		
			Willowood, LLC	PAY	
			Gig Harbor, WA		
			Willowood Propanil, LLC	PAY	
			Hockessin, DE		
Signature Jane M Miller			Name and Title Jane M. Miller, Agent		Date 01/30/2014

DATA MATRIX FOOTNOTES

1. **Description of Formulation Process:** Not applicable because the product is a TGAI/MP.
2. **Submittal of Samples:** Not required at this time.
3. **Flammability / Flame Extension:** Not applicable. Product does not contain combustible liquids.
4. **Explodability:** Not applicable. Product is not potentially explosive.
5. **Storage Stability:** In progress.
6. **Miscibility:** Not applicable. Product is not intended for dilution with petroleum solvents.
7. **Corrosion Characteristics:** In progress.
8. **Dielectric Breakdown Voltage:** Not applicable. Product is not intended for use around electrical equipment.
9. **Viscosity:** Not required because product is a solid.
10. **Vapor Pressure:** Not required since Propanil is a solid at ambient temperatures and would therefore have negligible vapor pressure under normal storage conditions.

21-Day Screen Completed by Contractor

21-Day Expires on 2-24-14

Jacket # 90188-R
MRID# 493099

Content Screen: Recommend to **Pass/Fail**

11-3 Review: **Pass/Fail/NA**

Overall Status: Recommend to **Pass/Fail**

Transfer This Jacket to:

STEPHEN SCHAIBLE

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

February 4, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-487371
EPA File Symbol or Registration Number: 90188-R
Product Name: PROPANIL TECHNICAL
EPA Receipt Date: 03-Feb-2014
EPA Company Number: 90188
Company Name: PRONIL, LLC

JANE M. MILLER
PRONIL, LLC
115 OBTUSE HILL ROAD
BROOKFIELD, CT 06804-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R333

NEW PRODUCT;MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF THE ACTIVE INGREDIENT;REQUIRES SCIENCE DATA REVIEW;NEW PHYSICAL FORM;CITE-ALL OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

Teresa Dorons

Front End Processing Staff
Information Technology & Resources Management Division

From: paygovadmin@mail.doc.twai.gov [mailto:paygovadmin@mail.doc.twai.gov]
Sent: Friday, January 31, 2014 10:23 AM
To: john.steffel@tfholdingsone.com
Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact Pay.gov Customer Service by phone at (800) 624-1373 or by email at pay.gov.clev@clev.frb.org.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25E6CLLP
Agency Tracking ID: 74564654779
Transaction Type: Sale
Transaction Date: Jan 31, 2014 11:22:43 AM

Account Holder Name: john steffel
Transaction Amount: $18,893.00
Billing Address: 17925 elm grove road
City: platte city
State/Province: MO
Zip/Postal Code: 64079
Country: USA
Card Type: Visa
Card Number: **********1861

Decision Number:
Registration Number:
Company Name: ProNil LLC
Company Number: 90188
Action Code: R333

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.