United Phosphorus, Inc.
Sherry B. Hutcheson
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
Phone: (229) 247-9041

Document Processing Desk (DCI/PRD)
Brian Kettl
Office of Pesticide Programs (7508P)
2777 South Crystal Drive
Arlington, VA 22202

December 19, 2017

RE: 90 day response for Tebuconazole Technical – GDCI-128997-1598; EPA Reg. No. 70506-72

Dear Mr. Kettl,

United Phosphorus, Inc. (UPI) is submitting our 90- day response to Data Call-In Notice: Generic ID # GDCI-128997-1598; Tebuconazole Technical EPA Reg. No. 70506-72.

Included with this transmittal letter please find the following:

- An application form, EPA Form 8570-1
- Data Call-In Response Form
- Requirements Status and Registrant's Response Form
- Copy of Tebuconazole Technical label

UPI is intending to meet the data requirements of the DCI which are applicable to our product. We will not be supporting antimicrobial uses and therefore are seeking a waiver request for the following:

- 875.1200 Dermal Exposure – Indoor
- 875.1400 Inhalation exposure – Indoor
- 875.1700 Product Use Information
- 875.2300 Indoor surface residue dissipation
- 835.3280 Simulation Tests to Assess the Biodegradability of Chemicals
- 850.3300 Modified Activated Sludge, Respiration Inhibition Test
- 835.1110 Activated sludge sorption isotherm
- 835.3110 Ready biodegradability
- 835.3220 Porous pot test
- 835.3240 Simulation Test- Aerobic sewage treatment – activated sludge

UPI does not have antimicrobial uses on any of our labels and is submitting a copy of the technical label for your review and consideration.

We are currently in discussions with Bayer Crop Science and other technical registrants to jointly develop data.

Should you require additional information or have questions concerning this submission, please contact me at 229-247-9041 or sherry.hutcheson@uniphos.com.

Sincerely,

Sherry Hutcheson

Sherry B. Hutcheson
Sr. Regulatory Manager

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

EPA United States Environmental Protection Agency Washington, DC 20460	☐ Registration ☐ Amendment ☒ Other:	OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
70506-72	Brian Kettl (CRM)	☐ None ☐ Restricted
4. Company/Product (Name) Tebuconazole Technical	PM#	
5. Name and Address of Applicant *(Include ZIP Code)* **United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406** ☐ *Check if this is a new address*	6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	

Section - II

☐ Amendment – Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application
☒ Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
90 day response for Data Call-In Generic ID@ GDCI-128997-1598.

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)
***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	4. Size(s) Retail Container	5. Location of Label Directions
☒ Label ☐ Container	**bulk**	☐ On Label ☒ On labeling accompanying product

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)
Sherry B. Hutcheson	Sr. Regulatory Manager	229-247-9041

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 knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received **(Stamped)**
Sherry Hutcheson	Sr. Regulatory Manager	
4. Typed Name Sherry B. Hutcheson	5. Date December 19, 2017	

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy

United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-4

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name	3. Date and Type of DCI and Number
UNITED PHOSPHORUS, INC 4110 136TH ST. CT NW GIG HARBOR, WA 98332 Correct Address: 630 Freedom Business Center Suite 402 King of Prussia, PA 19406	N/A - Tebuconazole Chemical # and Name: 128997 Tebuconazole	14-Sep-2017 GENERIC ID # GDCI-128997-1598

4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
70506-72			Yes	N/A	N/A

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

Signature and Title of Company's Authorized Representative Sherry Hutcheson Sr. Regulatory Manager

9. Date December 19, 2017

10. Name of Company United Phosphorus, Inc.

11. Phone Number 229-247-9041

ED_002206_00003292-00003

United States Environmental Protection Agency
Washington, D.C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

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UNITED PHOSPHORUS, INC 4110 136TH ST. CT NW GIG HARBOR, WA 98332 Correct Address: 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	N/A - Tebuconazole Chemical # and Name: 128997 Tebuconazole	14-Sep-2017 GENERIC ID # GDCI-128997-1598

4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
	Applicator Exposure Data Requirements (Conventional Chemical)									
875.1200	Dermal exposure--Indoor	**(15, 19, 41)**	Y				A,C,Q,X,BB	TEP	12	9
875.1400	Inhalation exposure--indoor	**(15, 19, 41)**	Y				A,C,Q,X,BB	TEP	12	9
875.1700	Product Use Information	**(15, 22)**	N				A,C,Q,X,BB	TEP	12	9
	Nontarget Plant Protection Data Requirements (Conventional Chemical)									
850.4100	Seedling Emergence and Seedling Growth	**(6, 14)**	N				A,C,Q,X,BB	TEP	12	2
850.4150	Vegetative Vigor	**(7, 14)**	N				A,C,Q,X,BB	TEP	12	2
	Post-Application Exposure Data Requirements (Conventional Chemical)									
875.2100	Foliar dislodgeable residue dissipation	**(14, 28)**	N				A,C,Q,X,BB	TEP	12	2
875.2300	Indoor surface residue dissipation	**(15, 17, 39, 41)**	Y				A,C,Q,X,BB	TEP	12	9

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

Signature and Title of Company's Authorized Representative Sherry Hutcheson Sr. Regulatory Manager

11. Date December 19,2017

12. Name of Company United Phosphorus, Inc.

13. Phone Number 229-247-9041

United States Environmental Protection Agency
Washington, D.C. 20460

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4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)									
850.2100	Avian acute oral toxicity test	**(14, 23)**	N				A,C,Q,X,BB	TGAI	12	2
850.3020	Honey bee acute contact toxicity	**(8, 14, 21)**	N				A,C,Q,X,BB	TGAI	12	2
850.3030	Honey bee toxicity of residues on foliage	**(2, 9, 14, 41)**	Y				A,C,Q,X,BB	TEP	12	2
850.3040	Field testing for pollinators	**(1, 3, 14, 20, 41)**	Y				A,C,Q,X,BB	TEP	24	2
835.1110	Activated sludge sorption isotherm	**(15, 34)**	N				A,C,Q,X,BB	TGAI	12	9
835.3110	Ready biodegradability	**(15, 33)**	N				A,C,Q,X,BB	TGAI	12	9
835.3220	Porous pot test	**(15, 32)**	N				A,C,Q,X,BB	TGAI	12	9
835.3240	Simulation Test-Aerobic Sewage Treatment-Activated Sludge	**(15, 31)**	N				A,C,Q,X,BB	TGAI	12	9

Sherry Hutcheson

December 19,2017

United States Environmental Protection Agency
Washington, D.C. 20460

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4. Guideline Requirement Number	5. Study Title		PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
835.3280	Simulation Tests to Assess the Biodegradability of Chemicals	**(15, 30)**	N				A,C,Q,X,BB	TGAI	12	9
850.3300	Modified Activated Sludge, Respiration Inhibition Test	**(15, 18, 24, 29)**	N				A,C,Q,X,BB	TGAI	12	9
850.4500	Algal Toxicity	**(16, 25, 38)**	N				A,C,Q,X,BB	TGAI, TEP	12	2
850.4550	Cyanobacteria (Anabaena flos-aquae) Toxicity	**(16, 25)**	N				A,C,Q,X,BB	TGAI, TEP	12	2
850.6100	Environmental Chemistry Methods and Associated Independent Laboratory Validation	**(14, 35)**	N				A,C,Q,X,BB	TGAI	12	2
SS-1196	Whole Sediment: Chronic toxicity to saltwater invertebrates	**(16, 37, 41)**	Y				A,C,Q,X,BB	TGAI	24	2
SS-1197	Whole Sediment: Chronic toxicity to freshwater invertebrates	**(16, 36, 41)**	Y				A,C,Q,X,BB	TGAI	24	2
SS-1311	Honey bee adult acute oral toxicity	**(10, 14)**	N				A,C,Q,X,BB	TGAI	12	2
SS-1312	Honey bee larvae acute oral toxicity	**(13, 14)**	N				A,C,Q,X,BB	TGAI	12	2

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4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
SS-1313	Honey bee adult chronic oral toxicity (11, 14, 41)	Y				A,C,Q,X,BB	TGAI	12	2
SS-1314	Honey bee larvae chronic oral toxicity (12, 14, 41)	Y				A,C,Q,X,BB	TGAI	12	2
SS-1315	Semi-field testing for pollinators (5, 14, 26, 27, 41)	Y				A,C,Q,X,BB	TGAI, TEP	24	2
SS-1316	Field trial of residues in pollen and nectar (4, 14, 40)	Y				A,C,Q,X,BB	TEP	24	2

Sherry Hutcheson

December 19,2017

2/4

Tebuconazole Technical

ONLY FOR USE IN THE MANUFACTURE OF FUNGICIDES

ACTIVE INGREDIENT:
Tebuconazole, α-[2-(4-chlorophenyl)-ethyl]-α-(1,1-dimethylethyl)-1*H*-1,2,4-triazole-1-ethanol..... 97.4%
OTHER INGREDIENTS..... 2.6%
100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
If inhaled	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call the Rocky Mountain Poison Center at 1-866-673-6671.	

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300

UPI

United Phosphorus Inc.
830 Freedom Business Center
Suite 402
King of Prussia, PA 19406
1-800-438-6071

EPA Reg. No. 70506-72

EPA Est. No.

Net Contents:

ACCEPTED with COMMENTS In EPA Letter Dated:
2/28/2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 70506-72

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Caution.

Harmful if absorbed through skin, inhaled, or if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

Environmental Hazards

This pesticide is toxic to estuarine invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Eliminations System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This material requires further mixing before use

Only for formulation into a fungicide for the following uses:

(1) **Terrestrial Food/Feed Crops:** Asparagus, Bananas, Barley (seed treatment and foliar application), Beans (fresh &dry except succulent shelled), Brassica Leafy Greens Subgroup 5-B, Bulb Vegetables Crop Group 3, Corn (sweet corn, field corn, field corn grown for seed, and popcorn), Cotton, Cucurbit Vegetables Crop Group 9, Fruiting Vegetables Crop Group 8, Garden beet roots and tops, Grapes, Grasses Grown for Seed, Hops, Lychee, Mango, Oats(seed treatment), Okra, Peanuts, Pistachios, Plantains, Pome Fruits Crop Group 11, Soybean, Stone Fruits Crop Group 12, Sunflower, Tree Nuts Crop Group 14, Turnips, Wheat (seed treatment and foliar application), Seed Treatment – Corn (includes sweet corn, field corn, field corn grown for seed, and popcorn).
Terrestrial Non-Food: Roses, Flowers, Christmas Trees, Ornamental trees, Ornamental shrubs, Groundcovers, and Vines, Houseplants.
Wood Protection: UPI Tebuconazole Technical Fungicide may be formulated into end-use aqueous and solvent system products to protect the following wood products against wood-rotting fungi:

Millwork: Window frames, wood doors, doorframes, etc.
In-Ground Contact Uses: Wood products for in-ground uses (pilings, telephone poles, wood building materials, etc.
Sapstain Control: Fresh-cut lumber

(2) Uses for which U.S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration; and

(3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

Formulators using this product are responsible for obtaining U.S. EPA registration for their formulated product which may be labeled for the use patterns as found listed on this label.

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Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE

Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, water, food, or feed. Keep out of reach of children and animals. Store in original containers only.

In case of spill, avoid contact, isolate area, and keep out animals and unprotected persons. Confine spills. Do not package Tebuconazole Technical in metal containers.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Do not contaminate water, food or feed by storage or disposal. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. Dispose of excess waste or pesticide by use according to label directions, or contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill. Completely empty container into the processing equipment by shaking and tapping sides and bottom to loosen clinging particles. Then dispose of empty liner in a sanitary landfill or by incineration, if allowed by State and local authorities, by burning. If burned, stay out of smoke. If drum is contaminated and cannot be reused, dispose of in the same manner.

IMPORTANT INFORMATION -READ BEFORE USING PRODUCT

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

United Phosphorus, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use. UNITED PHOSPHORUS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent allowed by law, United Phosphorus, Inc. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF UNITED PHOSPHORUS, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE, AT THE ELECTION OF UNITED PHOSPHORUS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT, OR COMPENSATION LIMITED TO DAMAGES NOT EXCEEDING THE FAIR MARKET PURCHASE PRICE, AND SHALL NOT INCLUDE INCIDENTAL OR CONSEQUENTIAL DAMAGES.**

United Phosphorus, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by the duly authorized representative of United Phosphorus, Inc.

Rev: 11/29/2010

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