

New York State Department of Environmental Conservation
Division of Solid and Hazardous Materials
Bureau of Pesticides Management, Room 498
Pesticide Product Registration Section
50 Wolf Road, Albany, New York 12233-7257
Phone: (518) 457-7446 • FAX: (518) 485-8990
Website: www.dec.state.ny.us/website/dshm/pesticide/pesticide.htm



September 15, 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jay A. Holmdal
State Regulatory Affairs Manager
RohMid, LLC.
Agricultural Chemicals Registration
and Regulatory Affairs Department
100 Independence Mall West
Philadelphia, PA 19106-2399

Dear Mr. Holmdal:

**Re: Request for Change in Registration Status:
MACH 2™ Liquid Turf Insecticide (EPA Reg. No. 69075-2)
MACH 2™ Granular Turf Insecticide (EPA Reg. No. 69075-4)**

This is to confirm our telephone conversation on September 9, 2000 regarding your proposal, dated July 20, 2000, to amend the registration status of the subject products containing the active ingredient halofenozide. At the present time all halofenozide products (commercial and homeowner) registered with this Department are prohibited from sale or use in Nassau and Suffolk Counties and are classified as a "restricted use" pesticide products.

Your proposal to reclassify the subject products from "restricted use" to "general use" classification and to lift the current label prohibition regarding sale and use of halofenozide products (commercial and homeowner) in Nassau and Suffolk Counties represents a major change in labeled (MCL) use pattern for halofenozide. As such, a new application is required.

In addition to the documents submitted with your proposal, you must submit two copies of the following information before your MCL application can be considered:

1. General application requirements, including application fee, listed in Section II.B of "New York State Pesticide Product Registration Procedures" (August 1996). A copy of this document and application forms are enclosed for your use;
2. Any applicable information listed in Appendix 1, Section B of "New York State Pesticide Product Registration Procedures" (August 1996).

Mr. Jay A. Holmdal

2.

In order for the Department to pursue the review of the referenced proposal, please submit the required information to this office within 45 days of receipt of this letter. Failure to submit the required information will result in termination of the review process and denial of the proposal due to incompleteness.

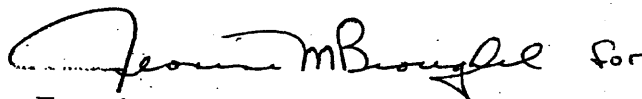
Halofenozide's environmental fate data, the products' groundwater advisory label statement and the Department's leaching simulations suggest that use of MACH 2™ Liquid Turf Insecticide and MACH 2™ Granular Turf Insecticide, as labeled, has the potential to adversely impact groundwater/drinking water resources in New York State. The sole source aquifers on Long Island, where permeable soils and shallow depth to groundwater are prevalent, are especially vulnerable to contamination.

On May 21, 1997, MACH 2™ Liquid Turf Insecticide and MACH 2™ Granular Turf Insecticide were conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). A Prospective Groundwater Study (PGW) is being conducted at South Seaville, New Jersey as a condition of the registration.

Please note that a favorable decision regarding your MCL proposal for the subject products is not anticipated until hard data (i.e., results of the PGW study) indicate that halofenozide will not impact groundwater to the extent predicted by the available information.

If you have any questions on this matter, please contact me at (518) 457-7446.

Sincerely,



Francis X. Hegener
Chief
Pesticide Product Registration Section

Enclosures