

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

OMB Approval 2070-0107
OMB Approval 2070-0057

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 SERGEANT'S PET CARE PRODUCTS, INC. 2625 SOUTH 158TH PLAZA OMAHA, NE 681301703	2. Case # and Name Chemical # and Name 128965 Ethofenprox	3. Date and Type of DCI and Number 27-Jul-2010 GENERIC ID # GDCL-128965-30005
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4. EPA Product Registration 2517-133	5. I wish to cancel this product registration voluntarily	6. Generic 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."		7. Product Specific Data 7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response." N.A.	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response." N.A.
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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 _____		9. Date 11. Phone Number
10. Name of Company		11. Phone Number

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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 WELLMARK INTERNATIONAL 1501 E. WOODFIELD ROAD, SUITE 200 WEST SCHAUMBURG, IL 60173	2. Case # and Name Chemical # and Name 128965 Ethofenprox	3. Date and Type of DCI and Number 27-Jul-2010 GENERIC ID # GDCl-128965-30005
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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 requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
2724-504				N.A.	N.A.
2724-667				N.A.	N.A.
2724-668				N.A.	N.A.
2724-675				N.A.	N.A.
2724-677				N.A.	N.A.
2724-699				N.A.	N.A.
2724-700				N.A.	N.A.
2724-701				N.A.	N.A.
2724-702				N.A.	N.A.
2724-705				N.A.	N.A.
2724-786				N.A.	N.A.
2724-791				N.A.	N.A.
2724-796				N.A.	N.A.
2724-797				N.A.	N.A.
2724-807				N.A.	N.A.

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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 PET LOGIC, L.L.C. PO Box 540224 OMAHA, NE 68130	2. Case # and Name Chemical # and Name 128965 Ethofenprox	3. Date and Type of DCI and Number 27-Jul-2010 GENERIC ID # GDCL-128965-30005
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4. EPA Product Registration 69332-3 69332-4	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."	

			N.A. N.A.	N.A. N.A.
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1. Company Name and Address MITSUI CHEMICALS AGRO, INC. PO Box 5126 VALDOSTA, GA 316035126	2. Case # and Name Chemical # and Name 128965 Ethofenprox	3. Date and Type of DCI and Number 27-Jul-2010 GENERIC ID # GDCl-128965-30005
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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 requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
86203-19				N.A.	N.A.
86203-20				N.A.	N.A.
86203-21				N.A.	N.A.
86203-22				N.A.	N.A.
86203-24				N.A.	N.A.
86203-4				N.A.	N.A.
86203-5				N.A.	N.A.
86203-6				N.A.	N.A.
86203-7				N.A.	N.A.

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Signature and Title of Company's Authorized Representative _____

9. Date	11. Phone Number
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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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 SERGEANT'S PET CARE PRODUCTS, INC. 2625 SOUTH 158TH PLAZA OMAHA, NE 681301703	2. Case # and Name Chemical # and Name Ethofenprox 128965	3. Date and Type of DCI and Number 27-Jul-2010 GENERIC ID # GDCL-128965-30005
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4. Guideline Requirement Number	5. Study Title	P R O G R E S S R E P O R T S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
		Progress Reports	1	2				
860.1740	Whole sediment: acute marine invertebrates		(24, 25)	EE, M, C, N, O, L	TGAI	12		

Initial to indicate certification as to information on this page (full text of certification is on page one).

Date	
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4. Guideline Requirement Number	5. Study Title	P R O G R E S S R E P O R T S			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
		1	2	3				

850.1740	Whole sediment: acute marine invertebrates (24,25)				EE, M, C, N, O, L	TGAI	12	
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Initial to indicate certification as to information on this page (full text of certification is on page one).
Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCL-128965-30005

Key: TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI or PAIRA = Technical Grade of the Active Ingredient or Active Ingredient; Radio-Labelled

Use Categories Key:

C -	Terrestrial nonfood crop	N -	Indoor medical use
L -	Indoor food use	O -	Residential Indoor use
M -	Indoor nonfood use	EE -	Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 The leaching and adsorption/desorption study is required for the parent.
- 2 The adsorption/desorption study is required for the degradate a-CO.
- 3 The adsorption/desorption study is required for the degradate 4'-OH.
- 4 Adsorption and desorption using a batch equilibrium method is preferred. However in some cases, for example, where the pesticide degrades rapidly, soil column leaching with unaged or aged columns may be more appropriate to fully characterize the potential mobility of the parent compound and major transformation products.
- 5 Not required when the electronic absorption spectra, measured at pHs 5, 7, and 9, of the chemical and its hydrolytic products, if any, show no absorption or tailing between 290 and 800 nm.
- 6 The independent laboratory validation of the analytical method of residues in water is required.
- 7 A storage stability study is required for the etofenprox residues of concern in frozen sediment stored for at least 170 days.
- 8 Environmental chemistry methods used to generate data associated with this study must include results of a successful confirmatory method trial by an independent laboratory. Test standards and procedures for independent laboratory validation are available as addenda to the guideline for this test requirement.
- 9 Requirement for terrestrial uses is based on potential for aquatic exposure and if pesticide residues have the potential for persistence, mobility, nontarget aquatic toxicity or bioaccumulation. Not required for aquatic residential uses. Field testing under the terrestrial field dissipation requirement may be more appropriate for some aquatic food crops, such as rice and cranberry uses, that are managed to have a dry-land period for production. The registrant is encouraged to consult with the Agency on protocols.
- 10 A Tier I seedling emergence test is required for the remaining nine tested plant species (corn, oat, onion, wheat, carrot, rape, tomato, cucumber, and soybean).
- 11 A Tier II seedling emergence test is required for lettuce because detrimental effects to this species were observed in the Tier I testing.
- 12 Data using the TGAI are required to support all outdoor end-use product uses including, but not limited to turf. Data are generally not required to support end-use products in the form of a gas, a highly volatile liquid, a highly reactive solid, or a highly corrosive material.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCL-128965-30005

Key: TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGA, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGA or PAIRA = Technical Grade of the Active Ingredient or Active Ingredient, Radio-Labelled

Use Categories Key:

C -	Terrestrial nonfood crop	N -	Indoor medical use
L -	Indoor food use	O -	Residential Indoor use
M -	Indoor nonfood use	EE -	Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 13 For greenhouse and indoor end-use products, data using the TGAI are required to support manufacturing-use products to be reformulated into these same end-use products or to support end-use products when there is no registered manufacturing-use product. Avian acute oral data are not required for liquid formulations for greenhouse and indoor uses. The study is not required if there is no potential for environmental exposure.
- 14 EP or TEP testing is required for any product which meets any of the following conditions:
i. The end-use pesticide will be introduced directly into an aquatic environment (e.g., aquatic herbicides and mosquito larvicides) when used as directed.
ii. The maximum expected environmental concentration (MEEC) or the estimated environmental concentration (EEC) in the aquatic environment is \geq one-half the LC50 or EC50 of the TGAI when the EP is used as directed.
iii. An ingredient in the end-use formulation other than the active ingredient is expected to enhance the toxicity of the active ingredient or to cause toxicity to aquatic organisms.
- 15 Data are required on one freshwater aquatic invertebrate species.
- 16 The freshwater fish test species for the TEP testing is the most sensitive of the species tested with the TGAI. Freshwater invertebrate and acute estuarine and marine organisms must also be tested with the EP or TEP using the same species tested with the TGAI.
- 17 Data are required for *Daphnia magna*.
- 18 Data are generally not required for outdoor residential uses, other than turf, unless data indicate that pesticide residues from the proposed use(s) can potentially enter waterways.
- 19 Data are required on estuarine/marine species if the product meets any of the following conditions:
i. Intended for direct application to the estuarine or marine environment.
ii. Expected to enter this environment in significant concentrations because of its expected use or mobility patterns.
iii. If the acute LC50 or EC50 < 1 milligram/liter (mg/l).
iv. If the estimated environmental concentration (EEC) in water is > 0.01 of the acute EC50 or LC50 or if any of the following conditions exist:
A. Studies of other organisms indicate the reproductive physiology of fish and/or invertebrates may be affected.
B. Physicochemical properties indicate bioaccumulation of the pesticide.
C. The pesticide is persistent in water (e.g., half-life in water > 4 days).

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCL-128965-30005

Key: TEP = Typical End Use Product (TEPI); TGAI = Technical Grade Active Ingredient [TGAI]; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI or PAIRA = Technical Grade of the Active Ingredient or Active Ingredient, Radio-Labelled

Use Categories Key:

C - Terrestrial nonfood crop N - Indoor medical use
L - Indoor food use O - Residential Indoor use
M - Indoor nonfood use EE - Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 20 Data are generally not required for outdoor residential uses, other than turf, unless data indicate that pesticide residues from the proposed use(s) can potentially enter waterways.
- 21 Data are required for mysid shrimp (*Americamysis bahia*).
- 22 Data are required if:
The half-life of the pesticide in the sediment is ≥ 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
A. The soil partition coefficient (Kd) is ≥ 50 .
B. The log Kow is ≥ 3 .
C. The Koc $\geq 1,000$.
ii. Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 23 Data are required if:
i. The half-life of the pesticide in the sediment is < 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
A. The soil partition coefficient (Kd) is ≥ 50 .
B. The log Kow is ≥ 3 .
C. The Koc $\geq 1,000$.
ii. Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 24 Sediment testing with estuarine/marine test species is required if the product is intended for direct application to the estuarine or marine environment or the product is expected to enter this environment in concentrations which the Agency believes to be significant, either by runoff or erosion, because of its expected use or mobility pattern.
- 25 Data are required for rainbow trout (*Oncorhynchus mykiss*).
- 26 Data using the TGAI are required to support all outdoor and end-uses including, but not limited to turf. Data are generally not required to support end-use products in the form of a gas, a highly volatile liquid, a highly reactive solid, or a highly corrosive material.

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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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.

4. Guideline Requirement Number	5. Study Title	2. Case # and Name	Chemical # and Name	128965	Ethofenprox	3. Date and Type of DCI and Number	27-Jul-2010 GENERIC ID # GDCL-128965-30005	8. Time Frame (Months)	9. Registrant Response
835.1230	<u>Environmental Fate Data Requirements (Conventional Chemical)</u> Sediment and soil absorption/desorption for parent and degradates								
835.2240	Direct photolysis rate of parent and degradates in water								
835.6200	Aquatic field dissipation								
850.4100	<u>Nontarget Plant Protection Data Requirements (Conventional Chemical)</u> Terrestrial plant toxicity, Tier 1 (seeding emergence)								
850.1010	<u>Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)</u> Aquatic invertebrate acute toxicity, test, freshwater daphnids								
850.1300	Daphnid chronic toxicity test								
850.1350	Mysid chronic toxicity test								
850.1400	Fish early-life stage toxicity test								
850.1735	Whole sediment: acute freshwater invertebrates								

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11. Date

Signature and Title of Company's Authorized Representative

12. Name of Company

13. Phone Number

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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 WELLMARK INTERNATIONAL 1501 E. WOODFIELD ROAD, SUITE 200 WEST SCHAUMBURG, IL 60173	2. Case # and Name Chemical # and Name Ethofenprox 128965	3. Date and Type of DCl and Number 27-Jul-2010 GENERIC ID # GDCl-128965-30005
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4. Guideline Requirement Number 850.1740	5. Study Title Whole sediment: acute marine invertebrates (24,25)	P R O T O C O L	6. Use Pattern EE, M, C, N, O, L	7. Test Substance TGAI	8. Time Frame (Months) 12	9. Registrant Response	
							Progress Reports
							1
							2

Initial to indicate certification as to information on this page (full text of certification is on page one).						Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: _____
DCI Number: GDCL-128965-30005

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- Use Categories Key:**
- C - Terrestrial nonfood crop N - Indoor medical use
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- 2 The adsorption/desorption study is required for the degradate a-CO.
- 3 The adsorption/desorption study is required for the degradate 4'-OH.
- 4 Adsorption and desorption using a batch equilibrium method is preferred. However in some cases, for example, where the pesticide degrades rapidly, soil column leaching with unaged or aged columns may be more appropriate to fully characterize the potential mobility of the parent compound and major transformation products.
- 5 Not required when the electronic absorption spectra, measured at pHs 5, 7, and 9, of the chemical and its hydrolytic products, if any, show no absorption or tailing between 290 and 800 nm.
- 6 The independent laboratory validation of the analytical method of residues in water is required.
- 7 A storage stability study is required for the etofenprox residues of concern in frozen sediment stored for at least 170 days.
- 8 Environmental chemistry methods used to generate data associated with this study must include results of a successful confirmatory method trial by an independent laboratory. Test standards and procedures for independent laboratory validation are available as addenda to the guideline for this test requirement.
- 9 Requirement for terrestrial uses is based on potential for aquatic exposure and if pesticide residues have the potential for persistence, mobility, nontarget aquatic toxicity or bioaccumulation. Not required for aquatic residential uses. Field testing under the Terrestrial Field Dissipation requirement may be more appropriate for some aquatic food crops, such as rice and cranberry uses, that are managed to have a dry-land period for production. The registrant is encouraged to consult with the Agency on protocols.
- 10 A Tier I seedling emergence test is required for the remaining nine tested plant species (corn, oat, onion, wheat, carrot, rape, tomato, cucumber, and soybean).
- 11 A Tier II seedling emergence test is required for lettuce because detrimental effects to this species were observed in the Tier I testing.
- 12 Data using the TGAI are required to support all outdoor end-use product uses including, but not limited to turf. Data are generally not required to support end-use products in the form of a gas, a highly volatile liquid, a highly reactive solid, or a highly corrosive material.

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iii. An ingredient in the end-use formulation other than the active ingredient is expected to enhance the toxicity of the active ingredient or to cause toxicity to aquatic organisms.

15 Data are required on one freshwater aquatic invertebrate species.

16 The freshwater fish test species for the TEP testing is the most sensitive of the species tested with the TGAI. Freshwater invertebrate and acute estuarine and marine organisms must also be tested with the EP or TEP using the same species tested with the TGAI.

17 Data are required for *Daphnia magna*.

18 Data are generally not required for outdoor residential uses, other than turf, unless data indicate that pesticide residues from the proposed use(s) can potentially enter waterways.

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i. Intended for direct application to the estuarine or marine environment.
ii. Expected to enter this environment in significant concentrations because of its expected use or mobility patterns.
iii. If the acute LC50 or EC50 < 1 milligram/liter (mg/l).
iv. If the estimated environmental concentration (EEC) in water is >0.01 of the acute EC50 or LC50 or if any of the following conditions exist:
A. Studies of other organisms indicate the reproductive physiology of fish and/or invertebrates may be affected.
B. Physicochemical properties indicate bioaccumulation of the pesticide.
C. The pesticide is persistent in water (e.g., half-life in water >4 days).

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- 21 Data are required for mysids shrimp (*Americanysis bahia*).
- 22 Data are required if:
The half-life of the pesticide in the sediment is ≥ 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
A. The soil partition coefficient (Kd) is ≥ 50 .
B. The log Kow is ≥ 3 .
C. The Koc $\geq 1,000$.
ii. Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 23 Data are required if:
i. The half-life of the pesticide in the sediment is < 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
A. The soil partition coefficient (Kd) is ≥ 50 .
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REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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.

4. Guideline Requirement Number	5. Study Title	2. Case # and Name	3. Date and Type of DCI and Number	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
		Ethofenprox		1 2 3			
835.1230	Environmental Fate Data Requirements (Conventional Chemical) Sediment and soil absorption/desorption for parent and degradates			EE, M, C, N, O, L	TGAI or PAIRA	12	
835.2240	Direct photolysis rate of parent and degradates in water			EE, M, C, N, O, L	TGAI or PAIRA	12	
835.6200	Aquatic field dissipation			EE, M, C, N, O, L	TEP	24	
850.4100	Nontarget Plant Protection Data Requirements (Conventional Chemical) Terrestrial plant toxicity, Tier 1 (seeding emergence) (10, 11)			EE, M, C, N, O, L	TEP	12	
850.1010	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical) Aquatic invertebrate acute toxicity, test, freshwater daphnids			EE, M, C, N, O, L	TGAI, TEP	12	
850.1300	Daphnid chronic toxicity test			EE, M, C, N, O, L	TGAI	12	
850.1350	Mysid chronic toxicity test			EE, M, C, N, O, L	TGAI	12	
850.1400	Fish early-life stage toxicity test			EE, M, C, N, O, L	TGAI	12	
850.1735	Whole sediment: acute freshwater invertebrates			EE, M, C, N, O, L	TGAI	12	

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

11. Date
Signature and Title of Company's Authorized Representative

12. Name of Company
13. Phone Number

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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 PET LOGIC, L.L.C. PO Box 540224 OMAHA, NE 68130	2. Case # and Name Chemical # and Name Ethofenprox	128965	3. Date and Type of DCI and Number 27-Jul-2010 GENERIC ID # GDCL-128965-30005
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4. Guideline Requirement Number 860.1740	5. Study Title Whole sediment: acute marine invertebrates (24, 25)	P R O T O C O L	Progress Reports	6. Use Pattern EE, M, C, N, O, L	7. Test Substance TGAI	8. Time Frame (Months) 12	9. Registrant Response
			1				
			2				
			3				

Initial to indicate certification as to information on this page
(full text of certification is on page one).

Date

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCL-128965-30005

Key: TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI or PAIRA = Technical Grade of the Active Ingredient or Active Ingredient, Radio-Labelled

Use Categories Key:

C - Terrestrial nonfood crop N - Indoor medical use
L - Indoor food use O - Residential Indoor use
M - Indoor nonfood use EE - Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 1 The leaching and adsorption/desorption study is required for the parent.
- 2 The adsorption/desorption study is required for the degradate a-CO.
- 3 The adsorption/desorption study is required for the degradate 4'-OH.
- 4 Adsorption and desorption using a batch equilibrium method is preferred. However in some cases, for example, where the pesticide degrades rapidly, soil column leaching with unaged or aged columns may be more appropriate to fully characterize the potential mobility of the parent compound and major transformation products.
- 5 Not required when the electronic absorption spectra, measured at pHs 5, 7, and 9, of the chemical and its hydrolytic products, if any, show no absorption or tailing between 290 and 800 nm.
- 6 The independent laboratory validation of the analytical method of residues in water is required.
- 7 A storage stability study is required for the etofenprox residues of concern in frozen sediment stored for at least 170 days.
- 8 Environmental chemistry methods used to generate data associated with this study must include results of a successful confirmatory method trial by an independent laboratory. Test standards and procedures for independent laboratory validation are available as addenda to the guideline for this test requirement.
- 9 Requirement for terrestrial uses is based on potential for aquatic exposure and if pesticide residues have the potential for persistence, mobility, nontarget aquatic toxicity or bioaccumulation. Not required for aquatic residential uses. Field testing under the terrestrial field dissipation requirement may be more appropriate for some aquatic food crops, such as rice and cranberry uses, that are managed to have a dry-land period for production. The registrant is encouraged to consult with the Agency on protocols.
- 10 A Tier I seedling emergence test is required for the remaining nine tested plant species (corn, oat, onion, wheat, carrot, rape, tomato, cucumber, and soybean).
- 11 A Tier II seedling emergence test is required for lettuce because detrimental effects to this species were observed in the Tier I testing.
- 12 Data using the TGAI are required to support all outdoor end-use product uses including, but not limited to turf. Data are generally not required to support end-use products in the form of a gas, a highly volatile liquid, a highly reactive solid, or a highly corrosive material.

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCI-128965-30005

Key: TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI or PAIRA = Technical Grade of the Active Ingredient or Active Ingredient, Radio-Labelled

Use Categories Key:

C -	Terrestrial nonfood crop	N -	Indoor medical use
L -	Indoor food use	O -	Residential Indoor use
M -	Indoor nonfood use	EE -	Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 13 For greenhouse and indoor end-use products, data using the TGAI are required to support manufacturing-use products to be reformulated into these same end-use products or to support end-use products when there is no registered manufacturing-use product. Avian acute oral data are not required for liquid formulations for greenhouse and indoor uses. The study is not required if there is no potential for environmental exposure.
- 14 EP or TEP testing is required for any product which meets any of the following conditions:
i. The end-use pesticide will be introduced directly into an aquatic environment (e.g., aquatic herbicides and mosquito larvicides) when used as directed.
ii. The maximum expected environmental concentration (MEEC) or the estimated environmental concentration (EEC) in the aquatic environment is \geq one-half the LC50 or EC50 of the TGAI when the EP is used as directed.
iii. An ingredient in the end-use formulation other than the active ingredient is expected to enhance the toxicity of the active ingredient or to cause toxicity to aquatic organisms.
- 15 Data are required on one freshwater aquatic invertebrate species.
- 16 The freshwater fish test species for the TEP testing is the most sensitive of the species tested with the TGAI. Freshwater invertebrate and acute estuarine and marine organisms must also be tested with the EP or TEP using the same species tested with the TGAI.
- 17 Data are required for *Daphnia magna*.
- 18 Data are generally not required for outdoor residential uses, other than turf, unless data indicate that pesticide residues from the proposed use(s) can potentially enter waterways.
- 19 Data are required on estuarine/marine species if the product meets any of the following conditions:
i. Intended for direct application to the estuarine or marine environment.
ii. Expected to enter this environment in significant concentrations because of its expected use or mobility patterns.
iii. If the acute LC50 or EC50 < 1 milligram/liter (mg/l).
iv. If the estimated environmental concentration (EEC) in water is >0.01 of the acute EC50 or LC50 or if any of the following conditions exist:
A. Studies of other organisms indicate the reproductive physiology of fish and/or invertebrates may be affected.
B. Physicochemical properties indicate bioaccumulation of the pesticide.
C. The pesticide is persistent in water (e.g., half-life in water >4 days).

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCL-128965-30005

Key: TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI or PAIRA = Technical Grade of the Active Ingredient or Active Ingredient; Radio-Labelled

Use Categories Key:

C -	Terrestrial nonfood crop	N -	Indoor medical use
L -	Indoor food use	O -	Residential Indoor use
M -	Indoor nonfood use	EE -	Indoor use

Footnotes: [The following notes are referenced in column two (5. Study File) of the REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE form.]

- 20 Data are generally not required for outdoor residential uses, other than turf, unless data indicate that pesticide residues from the proposed use(s) can potentially enter waterways.
- 21 Data are required for mysid shrimp (*Americamysis bahia*).
- 22 Data are required if:
 - The half-life of the pesticide in the sediment is ≥ 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
 - A. The soil partition coefficient (K_d) is ≥ 50 .
 - B. The log K_{ow} is ≥ 3 .
 - C. The K_{oc} $\geq 1,000$.
 - ii. Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 23 Data are required if:
 - i. The half-life of the pesticide in the sediment is < 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
 - A. The soil partition coefficient (K_d) is ≥ 50 .
 - B. The log K_{ow} is ≥ 3 .
 - C. The K_{oc} $\geq 1,000$.
 - ii. Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 24 Sediment testing with estuarine/marine test species is required if the product is intended for direct application to the estuarine or marine environment or the product is expected to enter this environment in concentrations which the Agency believes to be significant, either by runoff or erosion, because of its expected use or mobility pattern.
- 25 Data are required for rainbow trout (*Oncorhynchus mykiss*).
- 26 Data using the TGAI are required to support all outdoor and end-uses including, but not limited to turf. Data are generally not required to support end-use products in the form of a gas, a highly volatile liquid, a highly reactive solid, or a highly corrosive material.

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

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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 MITSUI CHEMICALS AGRO, INC. PO Box 5126 VALDOSTA, GA 316035126		2. Case # and Name Chemical # and Name Ethofenprox 128965		3. Date and Type of DCI and Number 27-Jul-2010 GENERIC ID # GDCL-128965-30005	
4. Guideline Requirement Number	5. Study Title	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
835.1230	<u>Environmental Fate Data Requirements (Conventional Chemical)</u> Sediment and soil absorption/desorption for parent and degradates	EE, M, C, N, O, L	TGAI or PAIRA	12	
835.2240	Direct photolysis rate of parent and degradates in water	EE, M, C, N, O, L	TGAI or PAIRA	12	
835.6200	Aquatic field dissipation	EE, M, C, N, O, L	TEP	24	
850.4100	<u>Nontarget Plant Protection Data Requirements (Conventional Chemical)</u> Terrestrial plant toxicity, Tier 1 (seeding emergence) (10, 11)	EE, M, C, N, O, L	TEP	12	
850.1010	<u>Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)</u> Aquatic invertebrate acute toxicity, test, freshwater daphnids	EE, M, C, N, O, L	TGAI, TEP	12	
850.1300	Daphnid chronic toxicity test	EE, M, C, N, O, L	TGAI	12	
850.1350	Mysid chronic toxicity test	EE, M, C, N, O, L	TGAI	12	
850.1400	Fish early-life stage toxicity test	EE, M, C, N, O, L	TGAI	12	
850.1735	Whole sediment: acute freshwater invertebrates	EE, M, C, N, O, L	TGAI	12	

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 _____

11. Date _____

12. Name of Company _____

13. Phone Number _____

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

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company Name and Address MITSUI CHEMICALS AGRO, INC. PO Box 5126 VALDOSTA, GA 316035126	2. Case # and Name Chemical # and Name Ethofenprox 128965	3. Date and Type of DCl and Number 27-Jul-2010 GENERIC ID # GDCl-128965-30005
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4. Guideline Requirement Number 850.1740	5. Study Title Whole sediment: acute marine invertebrates (24, 25)	P R O T O C O L	6. Use Pattern EE, M, C, N, O, L	7. Test Substance TGAI	8. Time Frame (Months) 12	9. Registrant Response	
							Progress Reports
							1
							2

Initial to indicate certification as to information on this page (full text of certification is on page one).	Date	
		3
		2
		1

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCL-128965-30005

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Use Categories Key:
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- 4 Adsorption and desorption using a batch equilibrium method is preferred. However in some cases, for example, where the pesticide degrades rapidly, soil column leaching with unaged or aged columns may be more appropriate to fully characterize the potential mobility of the parent compound and major transformation products.
- 5 Not required when the electronic absorption spectra, measured at pHs 5, 7, and 9, of the chemical and its hydrolytic products, if any, show no absorption or tailing between 290 and 800 nm.
- 6 The independent laboratory validation of the analytical method of residues in water is required.
- 7 A storage stability study is required for the etofenprox residues of concern in frozen sediment stored for at least 170 days.
- 8 Environmental chemistry methods used to generate data associated with this study must include results of a successful confirmatory method trial by an independent laboratory. Test standards and procedures for independent laboratory validation are available as addenda to the guideline for this test requirement.
- 9 Requirement for terrestrial uses is based on potential for aquatic exposure and if pesticide residues have the potential for persistence, mobility, nontarget aquatic toxicity or bioaccumulation. Not required for aquatic residential uses. Field testing under the terrestrial field dissipation requirement may be more appropriate for some aquatic food crops, such as rice and cranberry uses, that are managed to have a dry-land period for production. The registrant is encouraged to consult with the Agency on protocols.
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FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCI-128965-30005

Key: TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI or PAIRA = Technical Grade of the Active Ingredient or Active Ingredient; Radio-Labelled

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iii. An ingredient in the end-use formulation other than the active ingredient is expected to enhance the toxicity of the active ingredient or to cause toxicity to aquatic organisms.

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16 The freshwater fish test species for the TEP testing is the most sensitive of the species tested with the TGAI. Freshwater invertebrate and acute estuarine and marine organisms must also be tested with the EP or TEP using the same species tested with the TGAI.

17 Data are required for *Daphnia magna*.

18 Data are generally not required for outdoor residential uses, other than turf, unless data indicate that pesticide residues from the proposed use(s) can potentially enter waterways.

19 Data are required on estuarine/marine species if the product meets any of the following conditions:
i. Intended for direct application to the estuarine or marine environment.
ii. Expected to enter this environment in significant concentrations because of its expected use or mobility patterns.
iii. If the acute LC50 or EC50 $<$ 1 milligram/liter (mg/l).
iv. If the estimated environmental concentration (EEC) in water is $>$ 0.01 of the acute EC50 or LC50 or if any of the following conditions exist:
A. Studies of other organisms indicate the reproductive physiology of fish and/or invertebrates may be affected.
B. Physicochemical properties indicate bioaccumulation of the pesticide.
C. The pesticide is persistent in water (e.g., half-life in water $>$ 4 days).

FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name:

DCI Number: GDCI-128965-30005

Key: TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI or PAIRFA = Technical Grade of the Active Ingredient or Active Ingredient, Radio-Labelled

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- 20 Data are generally not required for outdoor residential uses, other than turf, unless data indicate that pesticide residues from the proposed use(s) can potentially enter waterways.
- 21 Data are required for mysid shrimp (*Americamysis bahia*).
- 22 Data are required if:
The half-life of the pesticide in the sediment is ≥ 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
A. The soil partition coefficient (Kd) is ≥ 50 .
B. The log Kow is ≥ 3 .
C. The Koc $\geq 1,000$.
ii. Registrants must consult with the Agency on appropriate test protocols prior to designing the study.
- 23 Data are required if:
i. The half-life of the pesticide in the sediment is < 10 days in either the aerobic soil or aquatic metabolism studies and if any of the following conditions exist:
A. The soil partition coefficient (Kd) is ≥ 50 .
B. The log Kow is ≥ 3 .
C. The Koc $\geq 1,000$.
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- 24 Sediment testing with estuarine/marine test species is required if the product is intended for direct application to the estuarine or marine environment or the product is expected to enter this environment in concentrations which the Agency believes to be significant, either by runoff or erosion, because of its expected use or mobility pattern.
- 25 Data are required for rainbow trout (*Oncorhynchus mykiss*).
- 26 Data using the TGA are required to support all outdoor and end-uses including, but not limited to turf. Data are generally not required to support end-use products in the form of a gas, a highly volatile liquid, a highly reactive solid, or a highly corrosive material.

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

LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

Case # and Name:

Co. Nr.	Company Name	Agent For	Address	City & State	Zip
86203	mitsui chemicals agro, inc.	landis international, inc.	PO Box 5126	VALDOSTA	GA 316035126
2517	SERGEANT'S PET CARE PRODUCTS, INC.	SERGEANT'S PET CARE PRODUCTS, INC.	2625 SOUTH 158TH PLAZA	OMAHA	NE 681301703
69332	PET LOGIC, L.L.C.	PET LOGIC, L.L.C.	PO Box 540224	OMAHA	NE 68130
2724	WELLMARK INTERNATIONAL		1501 E. WOODFIELD ROAD, SUITE 200 WEST	SCHAUMBURG	IL 60173