

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/26/2024	
Media Program:	Pesticides	
Regulatory Program(s)	Federal, Insecticide, Fungicide, and Rodenticide Act (FIFRA)	
Company Name:	Schirm USA, Inc.	
Facility Name:	Schirm USA, Inc.	
Facility Physical Location:	2801 South Oak Grove Road	
(city, state, zip code)	Ennis, Texas, 75119	
Mailing address:	2801 South Oak Grove Road	
(city, state, zip code)	Ennis, Texas, 75119	
County/Parish:	Ellis	
Facility Phone Number	972-878-4400	
Facility Contact:	Rebecca Rodgers	972-878-4400 x353
	Rebecca.Rodgers@schirmusa.com	
FRS Number:	110000456774	
Identification/Permit Number:	39578-TX-1	
Media Identifier Number:	N/A	
NAICS:	325320	
SIC:	2879	
Personnel participating in inspection:		
Kiera Hancock	EPA/ECADST	Physical Scientist
Lee McMillan	EPA/ECADST	Environmental Engineer
Rebecca Rodgers	Schirm USA, Inc.	Company Contact
Luiz Vazquez	Schirm USA, Inc.	Employee
Michael Garzon	Schirm USA, Inc.	Employee
Colton Watson	Schirm USA, Inc.	Employee
Terry Hendricks	Schirm USA, Inc.	Employee
Brad Leonard	Schirm USA, Inc.	Employee
EPA Lead Inspector Signature/Date	KIERA HANCOCK Digitally signed by KIERA HANCOCK Date: 2024.05.10 10:57:25 -05'00'	
	Kiera Hancock	Date
Supervisor Signature/Date	H STUCKEY Digitally signed by H STUCKEY Date: 2024.05.13 09:41:23 -05'00'	
	H. Troy Stuckey	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

This for-cause producer establishment inspection was conducted pursuant to the Federal, Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 9(a), 7 U.S.C. §136g(a), to evaluate compliance with FIFRA and regulations thereunder.

The inspection occurred for-cause to investigate the potential production, distribution, or sale of unregistered (cancelled) pesticides, including Probuild TC (EPA Reg. No. 100-1006), Curacron 8E (EPA Reg. No. 100-669), and Propicon 3.6EZ (EPA Reg. No. 69361-33).

FACILITY DESCRIPTION

Schirm USA, Inc. ("Schirm") was founded in 1976 and conducts formulation and packaging company for the chemical industry. The location in Ennis, Texas is a registered EPA establishment (Est. No. 39578-TX-1) to produce pesticides. This location conducts toll manufacturing of a variety of pesticides. Schirm earns an approximately \$36 million and has approximately 280 employees.

Section II – OBSERVATIONS

I, EPA Region 6 inspector, Kiera Hancock along with Lee McMillan, an EPA Region 6 inspector, arrived at Schirm USA, Inc. on March 26, 2024, at approximately 9:24AM. Upon entering the facility, we met with an employee, and I identified myself and Inspector McMillan as inspectors with the Environmental Protection Agency (EPA) and explained the purpose of our visit. The employee then contacted a representative to come and assist in the inspection. Inspector McMillan and I were met by Terry Hendricks and Brad Leonard and presented our federal inspector credentials to them. We were then also met by Rebecca Rodgers, Luiz Vazquez, Michael Garzon, and Colton Watson. Inspector McMillan and I then entered a conference room with the before mentioned employees of Schirm. Upon entering the conference room, I acquired the names and phone numbers of the employees and provided my business card. I then provided a Notice of Inspection (EPA Form 3540-2) for Ms. Rodgers to review and sign (Appendix 1). During this time, I explained to Ms. Rodgers the basic scope of the for-cause inspection. Upon verification of the Notice of Inspection, Ms. Rodgers and I signed it.

I then asked the company representatives about Schirm's corporate structure and background as well as its annual revenue and number of employees. I then explained to them the nature of the for-cause inspection, citing potential non-compliance with the reported production of Probuild TC (EPA Reg. No. 100-1006), Curacron 8E (EPA Reg. No. 100-669), and Propicon 3.6EZ (EPA Reg. No. 69361-33). The pesticides had their registration cancelled on March 22, 2017, April 13, 2018, and July 16, 2014, respectively. Schirm employees present explained that the facility is a toll manufacturer and the registrants, Syngenta Crop Protection, LLC and Generic Crop Science, LLC, have a contract with Schirm to produce the pesticides. It was explained that Schirm is provided the materials and labels to produce an

amount contracted by the registrant and after production, the product is distributed back to the registrant. I then asked if Schirm conducts any sale of pesticides, and it was confirmed they do not sell the pesticides. I then asked about other locations, and it was confirmed there is another facility in Benton, Illinois and they are owned by Schirm GmbH, located in Germany. I then requested distribution data, labels, and contracts on the three pesticides. I also provided compliance assistance regarding pesticide production reports (EPA Form 3540-16) for Est. No. 39578-TX-2.

I then asked to see the facility and observe where production is conducted. I asked if any of the forementioned pesticides were currently in inventory and Schirm informed that they do not believe any of them are still in inventory but will confirm. Schirm provided a safety briefing and Inspector McMillan and I donned required PPE. All Schirm employees present at the opening meeting along with Inspector Lee and I exited the main office and walked over to Warehouse #4 where small package production is conducted. Lee took some photographs and we all then continued to Warehouse #5, the building where insecticide formulation and packaging is conducted (Appendix 6). Mr. Watson informed us that he had a site plan he could provide, and we all then walked back to the office.

Back at the office, Inspector Lee and I were provided a site plan (Appendix 3), a label for Propicon 3.6EZ and Probuild TC (Appendix 4 & 5), Formulation and Packaging Agreement (Appendix 7), Non-Exclusive Toll Manufacturing Agreement (Appendix 8), product invoice for Probuild TC and Curacron 8E (Appendix 9 & 10). While obtaining the documents, Ms. Rodgers was informed that there were some drums of Curacron 8E still in inventory. Inspector McMillan left with some employees of Schirm and took photos of the Curacron 8E at Warehouse #1 while I stayed to complete paperwork. Once everyone was back at the office, I provided the Receipt for Samples (EPA form 3540-3) (Appendix 2), along with a Small Business Resources Information Sheet and Confidential Business Information notice to Ms. Rodgers. Copies were provided of the Receipt for Samples and Notice of Inspection. The inspection concluded at approximately 11:30am.

Section III – AREAS OF CONCERN

The areas of concern identified at the time of the inspection include the potential production and distribution of unregistered (cancelled) pesticides, including Probuild TC, Curacron 8E, and Propicon 3.6EZ.

Section IV – FOLLOW UP

The inspectors will review the collected labels and follow up with the registrants on the production of their respective pesticides. Schirm USA, Inc. has agreed to provide distribution records to Inspector Hancock on Probuild TC, Curacron 8E, and Propicon 3.6EZ upon request.

Section V – LIST OF APPENDICES

Appendix 1 – Notice of Inspection (EPA Form 3540-2)

Appendix 2 – Receipt for Samples (EPA Form 3540-3)

Appendix 3 – Schirm Facility Site Plan

Appendix 4 – Propicon 3.6EC Label

Appendix 5 – Probuild TC Label

Appendix 6 – Photo Log – 20 photos taken on 03/26/2024.

CBI Appendices (not included in published version of the report)

Appendix 7 – Formulation and Packaging Agreement

Appendix 8 – Non-Exclusive Toll Manufacturing Agreement

Appendix 9 – Invoice for Probuild TC

Appendix 10 – Invoice for Curacron 8E

Appendix 1

Notice of Inspection (EPA form 3540-2)



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection
Office of Enforcement and Compliance Assurance

Facility Name <i>Schirm USA, Inc.</i>	Facility Address <i>2801st Oak Grove Road, Ennis, Texas 75119</i>
Name of Facility Official <i>Rebecca Rodgers</i>	Title <i>Chief Operations Officer</i>

By my signature, I represent that I am an owner, operator or agent in charge of the facility being inspected, and attest that the EPA, Designated State or Political Subdivision Employee or Officer identified on this form presented his or her credentials prior to issuing this Notice of Inspection.

Facility Official's Signature: *Rebecca Rodgers*

Authority for Inspection

For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled and released for shipment, and samples of any containers or labeling for such pesticides or devices, in places where pesticides or devices are held for distribution or sale (FIFRA § 9(a) (7 U.S.C. §136g)); and for the purpose of inspecting and obtaining copies of those records specified in FIFRA §8 (7 U.S.C. §136f) and 40 C.F.R. Part 169.

Reasons for Inspections (Check applicable boxes)

☐ Routine Inspection	Violation
☒ For Cause Inspection	Suspected: <i>Production of cancelled pesticides</i>

Additional Information:

Name of Inspector <i>Kiera Hancock</i>	
Signature of Inspector <i>[Signature]</i>	Date <i>3/26/24</i>
Title <i>Enforcement officer/Inspector</i>	Time <i>9:38am</i>
Address <i>1201 Elm Street, Suite 500, Dallas, Texas 75270</i>	

Note: The absence of a Facility Official's signature on this form does not invalidate this Notice of Inspection, or establish that consent to the inspection was not provided or that the proper procedures were not followed.

Appendix 2

Receipt for Samples (EPA Form 3540-3)



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Receipt for Samples
Office of Enforcement and Compliance Assurance

Facility Name <i>Schirm USA, Inc.</i>	Facility Address <i>28015 Oak Grove Road, Ennis, Texas 75119</i>
Name of Facility Official <i>Rebecca Rodgers</i>	Title <i>Chief Operations Officer</i>

Samples Collected (Assign sample number and describe fully (e.g., product name, size, quantity, registration, establishment, lot, batch, model and/or serial numbers, etc.)) The following samples were collected by or on behalf of the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136g).

EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-01 - KH 12 20 Photos
EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-02 - Site Plan 2024
EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-03 - Non-Exclusive Toll Manufacturing Agreement
EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-04 - Formulation & Packaging Agreement
EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-05 - Distribution Prohibit TC
EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-06 - Distribution Label
EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-07 - Prohibit TC Label
EPAR06 - 03262024 - 087507 - 2291 - 0000611384 - 02-08 - Prohibit Label

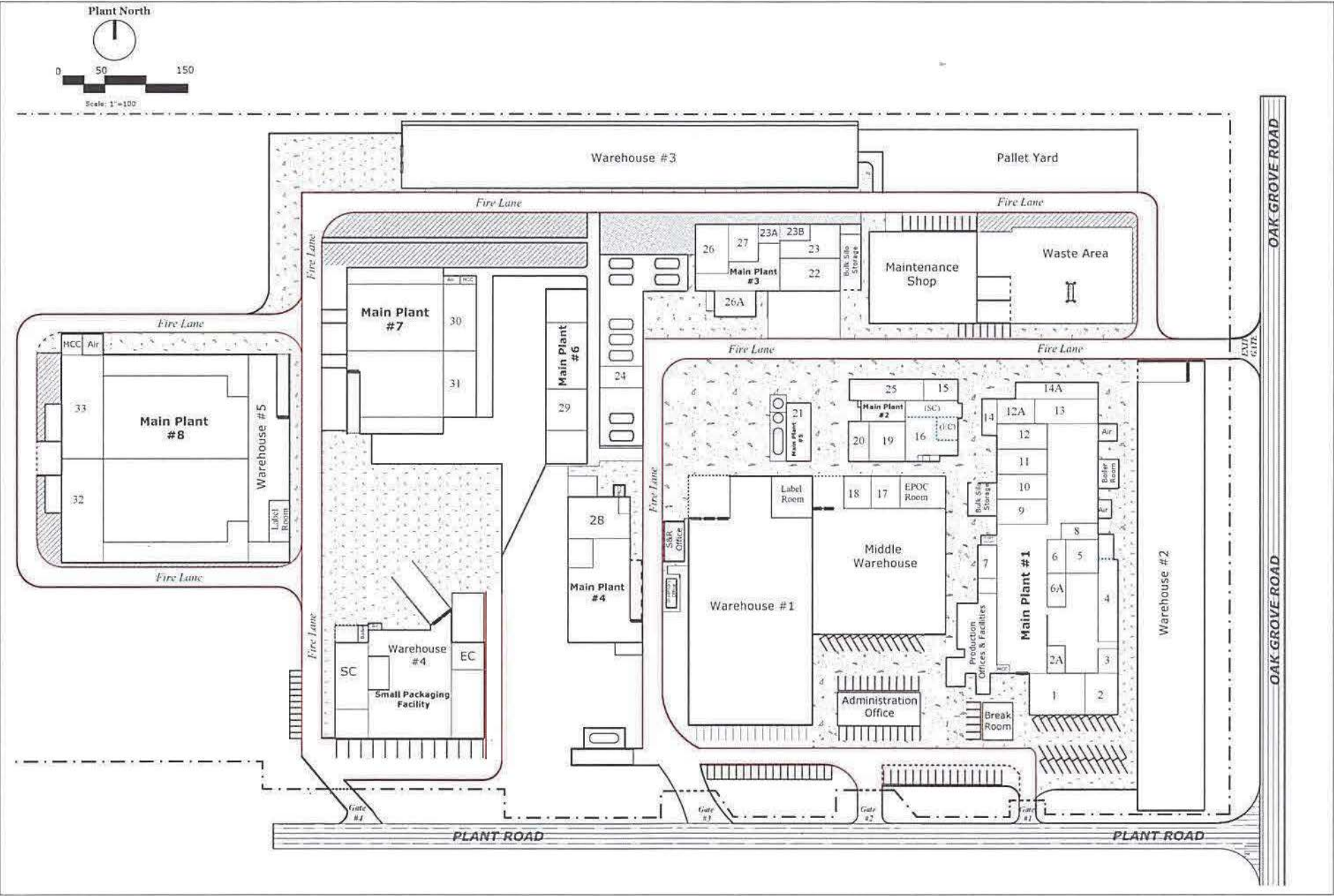
☐ Duplicate samples requested and provided	☐ Duplicate samples not requested	Amount paid	☐ Cash ☐ Credit Card ☐ No Charge
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Acknowledgement of Samples Collected: The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled and released for shipment.

Facility Official Signature <i>Rebecca Rodgers</i>	Date
Name of Inspector <i>Kiera Harwick</i>	Title <i>Enforcement Officer / Inspector</i>
Signature of Inspector <i>[Signature]</i>	Date <i>3/26/24</i>
Address <i>1201 Elm Street, Suite 500, Dallas, Texas 75270</i>	

Appendix 3

Schirm Facility Site Plan



Appendix 4

Propicon 3.6EC Label

FORM SR-151018

TOPIC: WAREHOUSE LOAD SHEET

Warehouse Receipt/Load Sheet

Date: 12-05-2022

Warehouse: N.A

Located By: N.A

Carrier: Fedex Ground

Trailer#: Ground

Pulled/Staged/Checked By: N.A

Company: Generic Corp

Shipper#: 210855

Loaded/Checked By: A.M

PO# 1014691

Item or Product Description	Size	# of Plts	Total Received /
Label Propicon 3.6EC	2.5gal	—	1.575eq
Package Unit(s)	Quantity	# of LBS Each	# Items Each
UPC or Label# 11531		#Finished units Each	
			TOTAL
Plt#	Item#, Form or Lot#	SEC	/ =

NET CONTENTS: 2.5 Gallons

PROPICONAZOLE GROUP 3 FUNGICIDE

Willowood PROPICON 3.6EC

Broad-spectrum fungicide for control of plant, turf and ornamental diseases

ACTIVE INGREDIENT:
Propiconazole* 41.8%

OTHER INGREDIENTS:** 58.2%

TOTAL: 100.0%

*CAS No. 60207-90-1
**Contains petroleum distillates
Contains 3.6 lbs. of propiconazole per gallon.

KEEP OUT OF REACH OF CHILDREN WARNING / AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

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 inhaled: Call a poison control center or doctor immediately for treatment advice. Do not give any liquid to the person. Do not induce vomiting unless told to do so by the 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.

If ingested: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

HOTLINE NUMBERS

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 Mon.-Fri., 8:00 am to 12:00 pm Pacific Time or your poison control center at 1-800-222-1222.

NOTE TO PHYSICIAN

Contains petroleum distillate - vomiting may cause aspiration pneumonia.

See inside label booklet for additional Precautionary Statements and Directions For Use.

Manufactured For:
Willowood, LLC
1887 Whitney Mesa Drive # 9740
Henderson, NV 89014-2069
20191105

EPA Reg. No. 87290-7
EPA Est. No. 39578-TX-001(SE), 89019-IND-001 (SI),
05905-GA-001 (HC), 70815-GA-002 (CV)
Letter(s) in the lot number correspond to letter(s) following the EPA Est. No.

PEEL BACK BOOK HERE

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REVISION: SEPTEMBER 23, 2021

SCHIRM USA INC.
SHIPPING/RECEIVING DEPT.

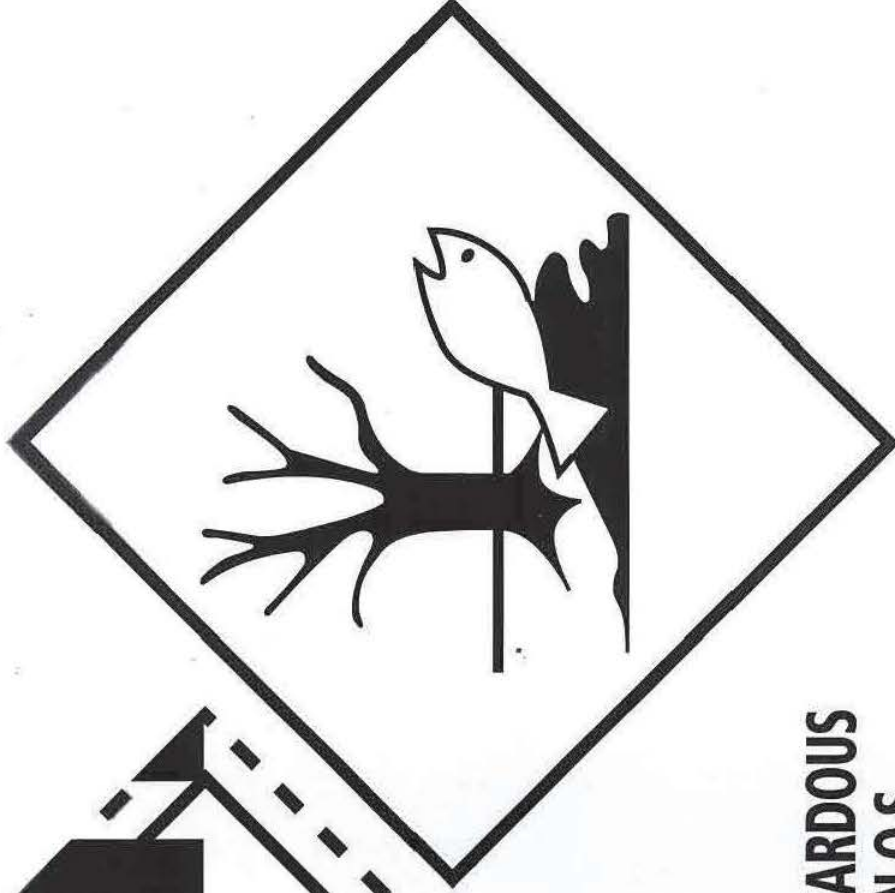
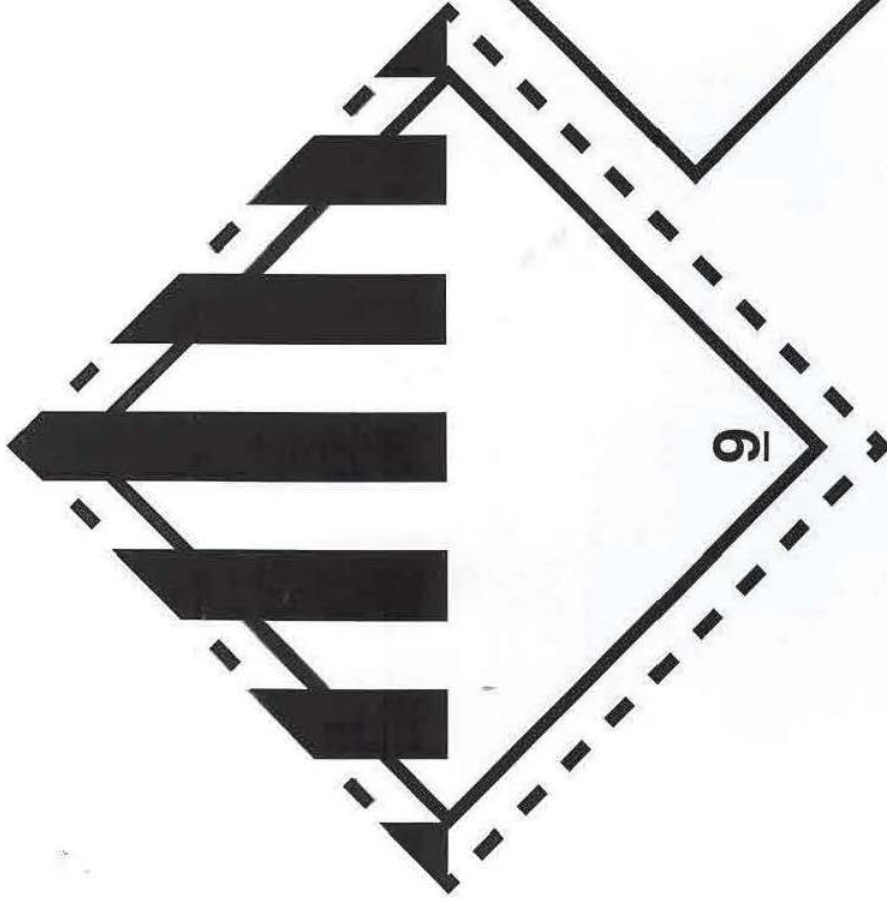
REVISION D
CONTROLLED COPY

AUTHOR: LUPE JONES
APPROVED BY: LARRY DAVIS

Appendix 5

Probuild TC Label

UN3082



**ENVIRONMENTALLY HAZARDOUS
SUBSTANCE, LIQUID, N.O.S.**

(CYPERMETHRIN, NONYLPHENOL ETHOXYLATES)

Net Vol. 208 liter

EPA#06-03262024-087507-2291-0000611384-02-07-Probuid



Probuid[®]TC

Termiticide

PH5042312

syngenta[®]

**A highly effective broad spectrum termiticide
concentrate for soil and wood treatments.**

KEEP OUT OF REACH OF CHILDREN

COMPOSITION:

Active Ingredient: Cypermethrin 25.3%

Other Ingredients 74.7%



DANGER

Registration No.: HSR - 5128

Product names marked ® or ™, the
SYNGENTA Logo and the CP FRAME 
are Trademarks of a Syngenta Group Company

208L

L1101925 / 4180657

TM

"BEFORE APPLYING THE PRODUCT, READ AND UNDERSTAND THE LABEL"

PROBUILD TC is a highly active broad-spectrum termiticide containing 250 grams of cypermethrin per liter, formulated as an emulsifiable concentrate. It is highly effective in controlling subterranean and drywood termites infesting structures when applied as pre- and post-construction soil treatment as well as wood treatment.

DIRECTION FOR USE: For soil treatment, whether pre- or post-construction, a 0.25 to 0.50% **Probuild TC** solution is applied at the rate of 4 to 6 liters per square meter. Follow similar dilution rate when treating trenches (0.25 — 0.50% a.i. concentration) and apply 4 to 6 liters of the solution per linear meter. Take every precaution to prevent gaps in the chemical barrier.

To control drywood termites in localized areas of infested wood in structures, apply 0.25 to 0.50% **Probuild TC** to voids and galleries in damaged wood and in spaces between wooden members of a structure and between wood and foundations where wood is vulnerable.

Refer to **Application Dilution Table** for proper amount of **Probuild TC** to be used. To prepare the application mixture, fill the application tank 1/4 to 1/3 of desired volume with water before adding **Probuild TC**. Then slowly add the required amount of **Probuild TC**. Add the remaining amount of water and agitate until product is thoroughly mixed.

Application Dilution Table

Volume of solution desired (L)	Amount in ml of Probuild TC needed to obtain the desired % dilution of active ingredients:	
	0.25 %	0.50 %
4	40	80
12	120	240
25	250	500
50	500	1000

As wood treatment, the wood is dipped until totally wet in a 0.25 to 0.50% solution of **Probuild TC**. It can also be applied as a spray or brush-on up to the point of minimal run-off. For pressure treatments, the wood should be placed in the treatment chamber, the **Probuild TC** solution added, and the system pressurized up to 250 p.s.i. for up to 1 hour depending on the density and type of wood treated.

STORAGE AND DISPOSAL: Store in original containers, tightly closed in a safe place. Do not contaminate ponds, ditches and waterways with empty containers. Drain, wash out, puncture and bury empty containers in wasteland. Formulation is classified as non-flammable and does not ignite spontaneously.

PRECAUTIONS: Avoid contact with skin and eyes. Wash splashes of concentrate from skin and eyes immediately. Avoid working in spray mist. Wash hands and exposed skin before meals and after work. Remove heavily contaminated clothing immediately and wash before re-use.

BABALA: IIMBAK SA LUGAR NA DI MAAABOT NG BATA. Iwasang malagay sa mga mata o madikit sa balat. Magsuot ng damit pananggalang kapag gagamit nito. Kung mawiwisikan nito, maghugas agad ng tubig at sabon. Kung sa mata, hugasan agad ng malinis na tubig at humingi kaagad ng payo sa doctor.

SYMPTOMS OF POISONING: Large doses may produce tremors, ataxia and weakness of limbs.

FIRST AID: If **swallowed**, do not give any liquid to the person. Do not induce vomiting. Do not give anything by mouth to an unconscious person. If **on eyes**, hold eye open and rinse slowly and gently with water for 15 to 20 minutes. If **inhaled**, remove from contaminated area and bring patient to fresh air. If breathing stops, apply artificial respiration. In case of skin contact, remove contaminated clothing and wash affected areas with plain soap and water for 15 to 20 minutes. **In all above cases, get medical attention immediately.**

NOTE TO PHYSICIAN: There is no specific antidote if this product is ingested. Treat symptomatically. Persons suffering a temporary allergic reaction may respond to treatment with antihistamines or steroid creams and/or systemic steroids. Skin contact paresthesia are transient, lasting up to 24 hours. The product contains petroleum distillates — vomiting may cause aspiration pneumonia.

WARRANTY: No warranty of any kind, expressed or implied, is made concerning the use of this product. User assumes risks and liability from handling, use or application.

DISTRIBUTED BY:
Syngenta Philippines, Inc.
9th Floor One Grifone Building,
Commerce Avenue corner Spectrum Midway,
Alabang, Muntinlupa, Metro Manila
Tel No. +632 8396 7430

National Poison Management and Control Center
c/o Philippine General Hospital
Tel. No.: +632 5241078; +632 5218450 (local 2311)

Syngenta Emergency Help Line
Tel. No.: +632 8540873

Formulation Date:

Batch No.:

Country of Origin: USA



Appendix 6

Photographic Log – 20 photos taken 3/26/2024



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0024.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:07am

Photographer: Lee McMillan

Description: Outside of Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0025.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:10am

Photographer: Lee McMillan

Description: Tank A inside Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0026.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:10am

Photographer: Lee McMillan

Description: Pesticide drums in Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0027.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:10am

Photographer: Lee McMillan

Description: Inventory in Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas

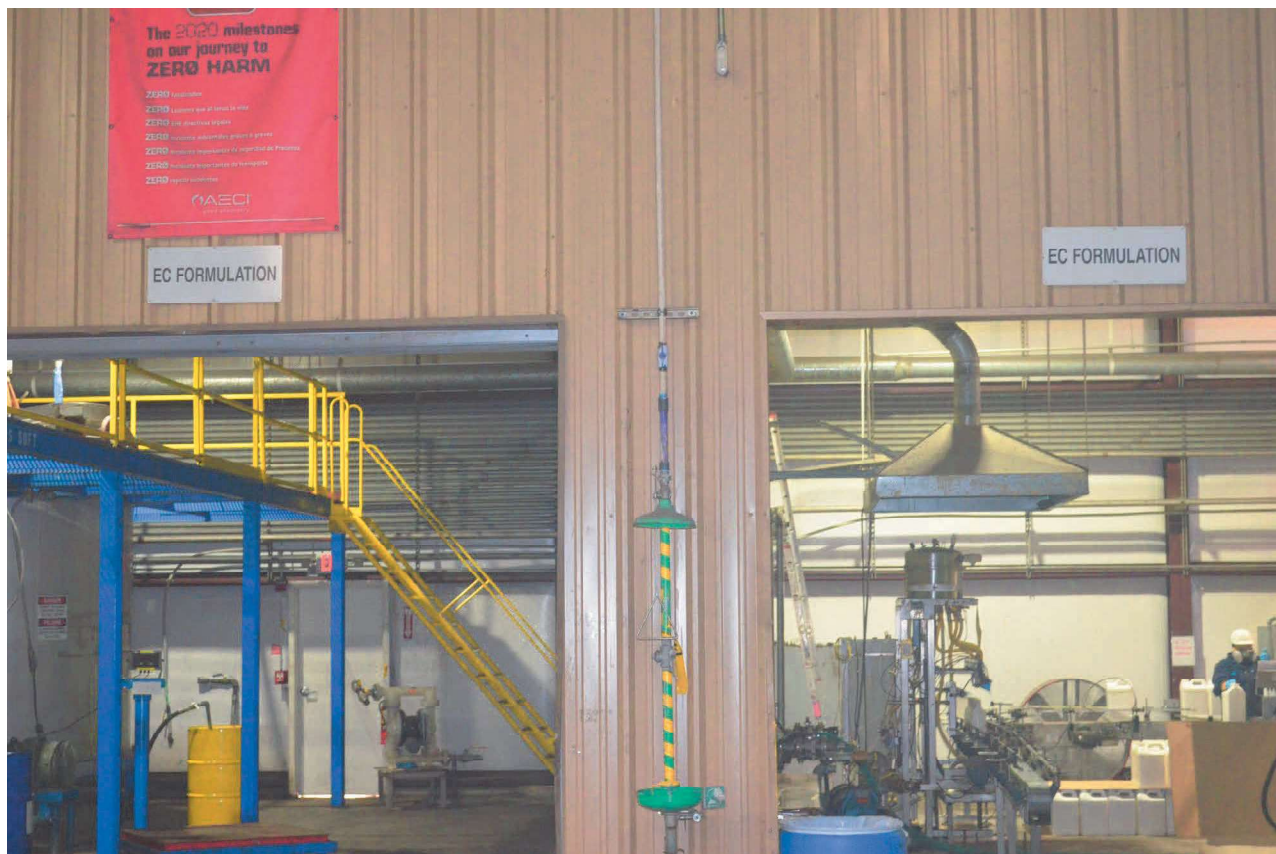


Photo File Name: DSC_0028.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:11am

Photographer: Lee McMillan

Description: EC Formulation in Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0029.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:12am

Photographer: Lee McMillan

Description: Mixer tank in Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas

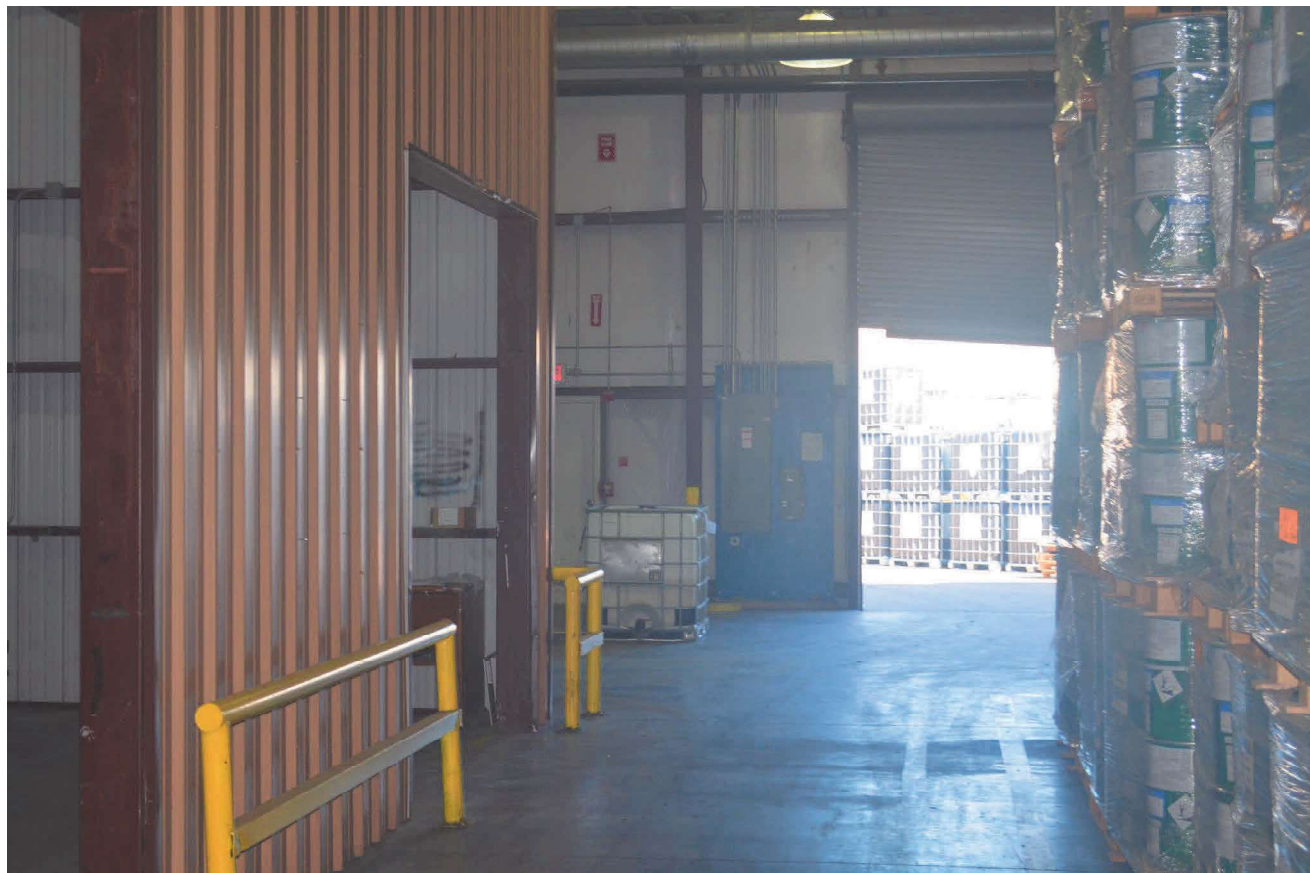


Photo File Name: DSC_0030.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:12am

Photographer: Lee McMillan

Description: Inside Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0031.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:12am

Photographer: Lee McMillan

Description: FC Formulation in Warehouse #4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0032.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:13am

Photographer: Lee McMillan

Description: Outside sign for Warehouse #5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0033.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:16am

Photographer: Lee McMillan

Description: Inside of Warehouse #5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0034.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:16am

Photographer: Lee McMillan

Description: Inside inventory of Warehouse #5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0035.JPG

Date of Photo: 03/26/2024

Time of Photo: 10:19am

Photographer: Lee McMillan

Description: Overview of Warehouse #7 – Herbicide Formulation and Packing Facility



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0036.JPG

Date of Photo: 03/26/2024

Time of Photo: 11:03am

Photographer: Lee McMillan

Description: Curacron 8E barrels



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0038.JPG

Date of Photo: 03/26/2024

Time of Photo: 11:04am

Photographer: Lee McMillan

Description: Curacron 8E drum label



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas

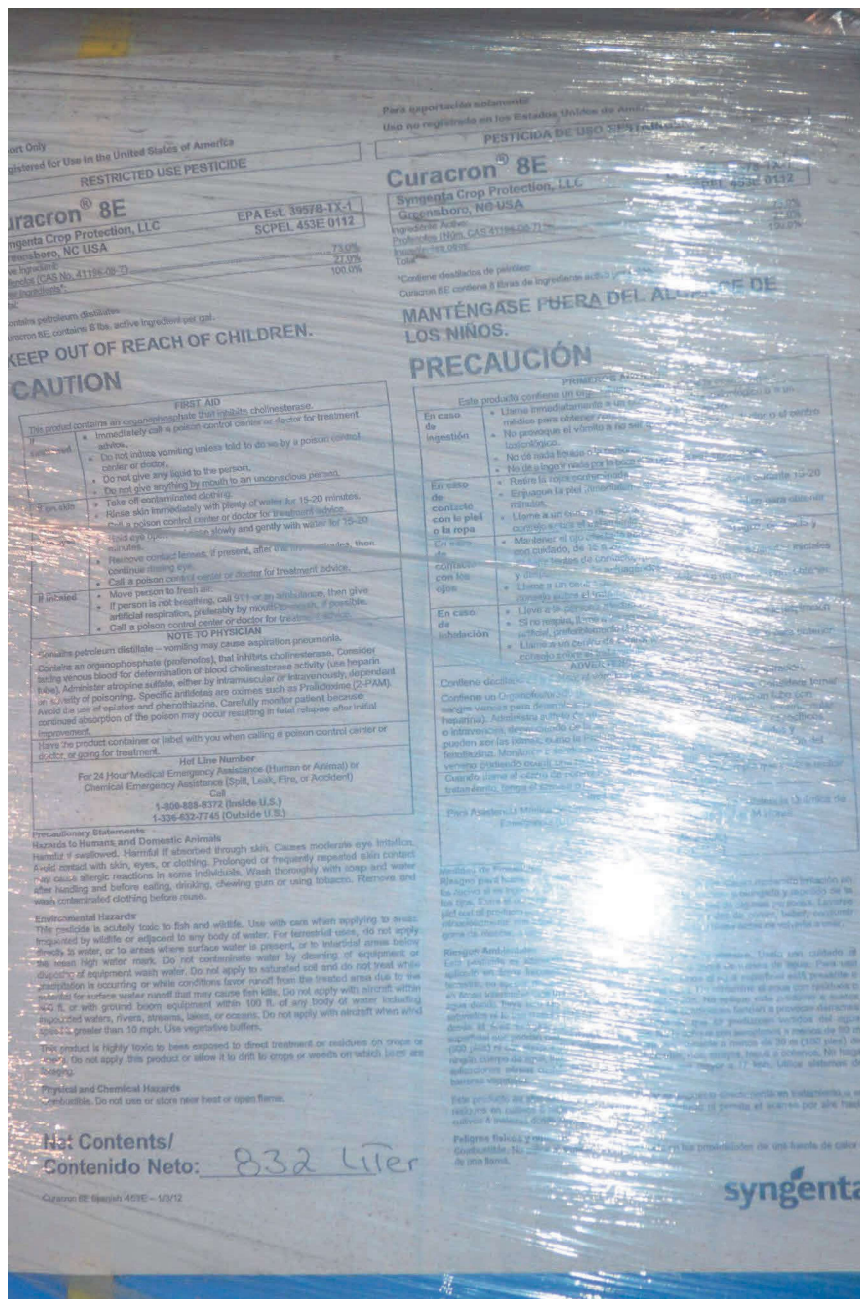


Photo File Name: DSC_0040.JPG
Date of Photo: 03/26/2024
Time of Photo: 11:05am
Photographer: Lee McMillan
Description: Curacron 8E drum label



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0041.JPG

Date of Photo: 03/26/2024

Time of Photo: 11:06am

Photographer: Lee McMillan

Description: Curacron 8E drum label



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas

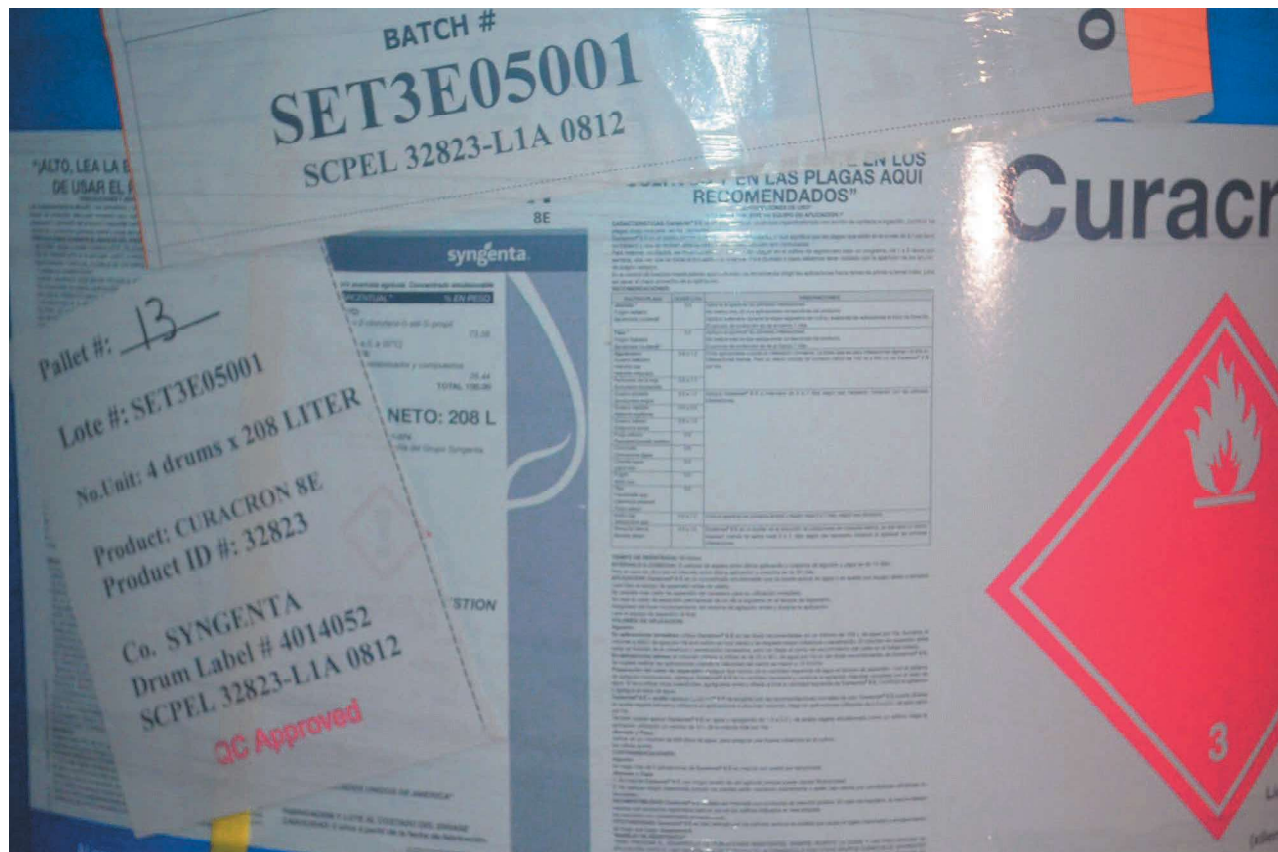


Photo File Name: DSC_0042.JPG

Date of Photo: 03/26/2024

Time of Photo: 11:06am

Photographer: Lee McMillan

Description: Curacron 8E drum label



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas



Photo File Name: DSC_0043.JPG

Date of Photo: 03/26/2024

Time of Photo: 11:06am

Photographer: Lee McMillan

Description: Curacron 8E drum label



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: 2901 South Oak Grove		
City: Ennis	County/Parish: Ellis	State: Texas

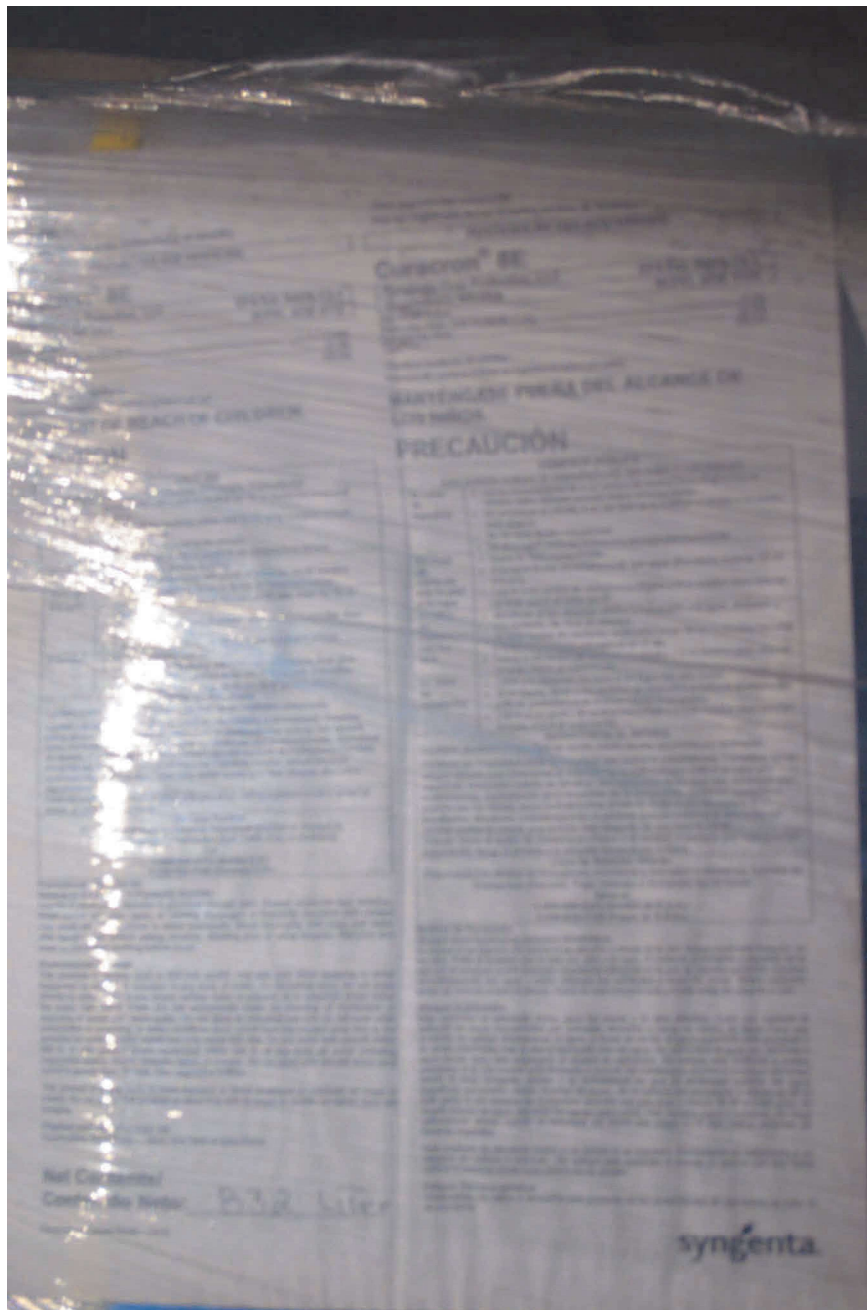


Photo File Name: DSC_0044.JPG

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