



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jon C. Wood
Amvac Chemical Corporation
4695 MacArthur Court, Suite 1250
Newport Beach, CA 92660

APR 15 2008

Subject: Amendment - Add New Uses (Duck Blinds, Deer Stands)
Amvac Small Insect Strip
EPA Reg. No. 5481-344
Your submission dated August 3, 2007

Dear Mr. Wood:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. On front panel change "most" to "many" in the last bullet.
2. Under Enclosed Deer Stands and Duck Blinds delete, "...or other similar enclosures" in the first sentence.
3. On pg 4 revise the warranty statement so that it is consistent with the latest approved labels for the other Amvac DDVP products.
4. On pg 5 under Marketing Claims delete "...so you will be insect free". Statements/phrases implying total eradication or elimination of pests are not acceptable.

If you have any questions in regard to this letter, please feel free to contact me at (703) 305-6100.

Sincerely,

A handwritten signature in black ink, appearing to read "G. LaRocca".

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505P)

2 7 7

AMVAC SMALL INSECT STRIP*

*Alternate descriptive words that may be used for "strip" on this label are "unit" and/or "bar".
Kills Flying and Crawling Insect Pests as Listed. Long-Lasting, 'Round-the-Clock' Protection.
Solid Strip Formula Kills Flies, Moths, Mosquitoes, Gnats, Cockroaches, Silverfish, Spiders, Wasps and Other Insects as Listed.

Within Homes, Use Only in Closets, Wardrobes, and Cupboards. Also for Use in Storage Units, Garages, Attics, Crawl Spaces, Boathouses, Covered Boats, Museum Collections, Garbage Cans, Trash Dumpsters, Animal Buildings, Milk Rooms, Catch Basins, Bulk Raw Grain, Storage Bins, Enclosed Utility Boxes, Reptile Houses and Terrariums, Enclosed Deer Stands and Duck Blinds.

HOUSEHOLD USES

"A Clothes Moth Killer" – "Use as a Moth Killer"
"A Small Space Insect Killer"
"A Fly Killer" – "Use as a Fly Killer"
(Optional or Alternate wording)

Controlled release (technology) ♦ Continuous (slow) release technology (action) ♦ Sustained release (technology) ♦ Small Space Bug Killer ♦ Moth Killer ♦ Kills Flying and Crawling Insects as listed ♦ Long-Lasting, Round-the-Clock Protection ♦ Convenient, Ready To Use ♦ Simply remove from package to begin controlling action ♦ Solid Unit Formula Kills Flies, Moths, Cockroaches, Silverfish, Spiders, and Other Insects as listed ♦ Use in specified areas within Garages ♦ Use Only in closets, wardrobes and cupboards within homes ♦ Garbage Cans and Storage Bins ♦ Unscented - No Unpleasant Odor ♦ Clean, Odorless, deep penetrating vapor (action) ♦ No-mess vapor technology ♦ Leaves no mess (residue) ♦ Kills Moths ♦ A Clothes Moth Killer ♦ Non-staining ♦ Will not damage natural or synthetic materials ♦ Use as a Moth Killer ♦ A Small Space Insect Killer ♦ One Unit (16 g) will treat up to 200 cu. ft. ♦ One Unit (16 g) treats up to 200 cu. ft. ♦ One Unit (16 g) will treat a closet up to 200 cubic feet. ♦ One Unit (10.5 g) will treat up to 100 cubic feet ♦ One Unit (10.5 g) treats up to 100 cu. ft. ♦ One Unit (10.5 g) will treat a closet up to 100 cubic feet. ♦ One Unit (5.25 g) will treat up to 50 cubic feet ♦ One Unit (5.25 g) treats up to 50 cu. ft. ♦ Keeps protecting (insects out) for up to 4 months ♦ Works up to 4 months ♦ Long term (enclosed) space protection ♦ Continuous (insect) protection for up to 4 months ♦ Keeps killing up to 4 months ♦ Lasts up to 4 months ♦ Kills up to 4 months ♦ Just hang or stand up in garages - Sheds - Attics ♦ Kills wasps, mosquitoes, spiders and most insects for up to 4 months

How it works: The Amvac Small Insect Strip utilizes controlled release technology to slowly diffuse a deep penetrating vapor in enclosed spaces for up to 4 months. The clean, odorless vapor is evenly distributed throughout the enclosed treatment area, killing visible and hidden insects on contact and preventing new insect infestations (while you're away).

ACTIVE INGREDIENTS:

Dichlorvos (2,2-dichlorovinyl dimethyl phosphate).....18.6%
Related Compounds.....1.4%

INERT INGREDIENTS:.....80.0%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for Additional Precautions/See Back for Additional Precautionary Statements
EPA Reg. No. 5481-344
EPA Est. No. 68643-GBR-001

Net Weight:

Three Sizes Available - See Chart for Space Treated with Each Size.
5.25 g (0.9 oz), 10.5 g (0.37 oz), 16 g (0.56 oz)

AMVAC Chemical Corporation

4100 East Washington Boulevard Los Angeles, California 90023, USA
www.amvac-chemical.com
1-323-264-3910

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
4-15-08**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
5481-344**

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Do not get in mouth. Harmful if swallowed. After prolonged storage, a small amount of liquid may form on strip. Do not get liquid in eyes. Wash hands thoroughly with soap and water after handling strip. Do not use in hospitals or clinic rooms, such as patient rooms, wards, nurseries, operating or emergency areas. Do not use in kitchens (except cupboards), restaurants or areas where food is prepared or served. Not to be taken internally by humans or animals.

FIRST AID	
If on skin or clothing:	<ul style="list-style-type: none"> • 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 in eyes:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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.
<p>Have product container or label with you when calling a Poison Control Center or doctor or going for treatment. For the following emergencies, phone 24 hours a day: Transportation: CHEMTREC.....1-800-424-9300 Other: AMVAC.....1-323-264-3910</p>	

STOP! READ ENTIRE LABEL BEFORE USE

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Remove pre-assembled AMVAC SMALL INSECT STRIP from sealed bag when ready to use. Place (*Hang*) in desired location away from windows and out of reach of children and pets. (*To apply strips to vertical surfaces, use the enclosed stickers*). Drafts, weather and other conditions may affect the performance, but treatment usually lasts for four (4) months. (*One ____g strip will treat ____ cu. ft.*). Record the date of installation and replace with a new, fresh, full-strength strip at the end of four (4) months or when effectiveness diminishes. Do not over treat. Do not use in the food/feed processing or food/feed manufacturing or food/feed service establishments. Non-food/feed areas of these establishments where the product can be used are areas such as garbage rooms, lavatories, floor drains (to sewer) entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, utility equipment, garages, mop closets, and product storage (after canning or bottling). This product controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, and earwigs and other insects as listed.

Only available in the following sizes: 16 gram (0.56 oz), 10.5 gram (0.37 oz) and 5.25 gram (0.9 oz) pest strip sizes.

Within homes, use only in closets, wardrobes, and cupboards. Also for use in storage units, garages, attics, crawl spaces, boathouses, museum collections, garbage cans, trash dumpsters, animal buildings, milk rooms, catch basins, bulk raw grain, storage bins, enclosed utility boxes, reptile houses, and terrariums.

HOUSEHOLD, INDUSTRIAL, AND COMMERCIAL USES

Homes (for use only in closets, wardrobes, and cupboards), Garages, Storage Units, Attics, Crawl Spaces, Boathouses

Controls flies, mosquitoes, gnats and other insects as listed.

- Assembly Instructions for Non-Assembled Strip
1. Gently squeeze edges of holder to open ends of unit.
 2. Press in bottom locking tabs to prevent strip from sliding out of holder.
 3. Without damaging the strip inside, carefully cut open the envelope with scissors. Slide bar into the holder at the top.
 4. Press in top locking tabs to secure strip inside holder.
 5. To hang, attach metal hook through hold of unit.

Garbage Cans, Trash Dumpsters

For control of flies in garbage cans and dumpsters, attach appropriate sized strip (One ____ g strip treats ____ to ____ cu. ft.) inside can or dumpster. Keep lid on can and dumpster closed.

Animal Buildings

Controls flies, mosquitoes and gnats in horse barns, calf parlors, hog parlors, stables, poultry houses, tack rooms and dog kennels. Do not contaminate food, water or foodstuffs. DO NOT contaminate milk or milking equipment.

Milk Rooms

Controls flies, mosquitoes and gnats in milk rooms and bulk storage rooms. DO NOT contaminate milk or milking equipment.

Agricultural Commodities

Bulk storage of raw grains such as corn, soybeans, cocoa beans and peanuts. For control of stored product insects including Almond Moths, Cocoa Moths, Indian Meal Moths, and Mediterranean Flour Moths infesting non-perishable bulk-stored raw agricultural commodities. Calculate cubic feet of air space above the commodity to determine the number of strips required for treatment. Treat in early Spring before moths begin to emerge. Replace strip when needed to prevent egg laying by moths. Hang strips so as not to impede air circulation. When multiple strips are required, distribute them uniformly over the treated space.

Catch Basins

To control mosquitoes breeding in catch basin, suspend one strip about ten inches above water level. Use a size appropriate for the space being treated: one (1) 5.25 g strip per 25 to 50 cu. ft. or one (1) 10.5 g strip per 50 to 100 cu. ft. or one (1) 16 g strip to treat 100 to 200 cu. ft. Usual control lasts 10 to 15 weeks.

Enclosed Utility Boxes

To control Fire Ants, Wasps and other insects as listed which commonly infest utility enclosures, cabinets conduits, junctions boxes, enclosed electrical panels and motor control rooms. Remove from sealed bag and hang or stand so air can contact all sides of the strip. Use a size appropriate for the space being treated: one (1) 5.25 g strip per 25 to 50 cu. ft. or one (1) 10.5 g strip per 50 to 100 cu. ft. or one (1) 16 g strip to treat 100 to 200 cu. ft. of enclosed space for utility equipment such as communications equipment, electric, gas, water and cable television. Record installation date and replace when effectiveness diminishes.

Enclosed Deer Stands and Duck Blinds

Kills wasps, mosquitoes, spiders and other insects in deer stands, duck blinds or other similar enclosures. Remove the pest strip from the foil pouch and put it in the enclosed shot gun shell mount. Stand the Amvac Small Insect Strip dispenser in an enclosed space to be treated. For a deer stand or a duck blind, place the device one to two months prior to the beginning of the hunting season. If you plan to be in the stand for more than 4 hours in a day, remove the Amvac Small Insect Strip dispenser and ventilate the stand overnight. It can be replaced while the stand is not in use to prevent re-infestation of nuisance insect pests.

Reptile Houses and Terrariums

For control of mites on reptiles. **In Reptile Houses:** Hang appropriate number of 16 g strips per 200 cu. ft. for the space to be treated. Do not over treat. **In Terrariums:** Cover the top of an open terrarium having a minimum size of 10 cubic feet with a wire screen and place a caged 10.5 or 16 g strip on the screen for 48 hours. Make sure that the reptiles cannot touch or contact the strip. Remove the strip after the treatment interval.

How much space will one strip treat?

Strip Size	Treats	Approx. Equivalent to Area Measuring
5.25 grams	25 to 50 cu. ft.	4' x 3' x 2' = 24 cu. ft. 8' x 3' x 2' = 48 cu. ft.
10.5 grams	50 to 100 cu. ft.	8' x 6' x 2' = 96 cu. ft.
16 grams	100 to 200 cu. ft.	8' x 8' x 3' = 192 cu. ft.

Always use the appropriate size and number of strips for the space being treated. If more than one is required, distribute them over the space equally.

HOUSEHOLD USES

Use only in Closets, Wardrobes, and Cupboards

Gives continuous protection against moths, silverfish, cockroaches and other insects as listed in closets, wardrobes and cupboards for up to four (4) months and leaves no smell (*odor*). Remove strip from sealed bag and hang or stand on wardrobe or closet rail, ensuring that strip does not contact clothes or fabrics and that air can circulate around the strip. (*One ___ g strip will treat a space of ___ to ___ cubic feet*). One 5.25 g strip will treat a space of 25 to 50 cu. ft. One 10.5 g strip will treat a space of 50 to 100 cu. ft. Use one 16 g strip to treat 100 to 200 cu. ft. for up to four (4) months. If more than one is required, distribute them over the space equally. Keep the space closed. Record the date of installation so that the old strip may be replaced with a new, fresh, full-strength strip at the end of the four (4) month period or when effectiveness diminishes.

Do not use more than the number of strips recommended for the space to be treated. Do not use where unwrapped food is stored or allow the strip to come into contact with food or cooking utensils. Do not allow children or pets to play or sleep in these areas when treatment is in progress.

Attics, Garages, and Enclosed Crawl Spaces

Kills flies and other insects as listed for up to four (4) months. Remove from sealed bag and hang or stand, out of reach of children and pets, in an open space of an enclosed area, away from windows. Calculate cubic feet of air space to determine the number of strips required for treatment. Hang strips so as not to impede air circulation. When multiple strips are required, distribute them uniformly over the treated space. Record the date of installation so that the old strip may be replaced with a new, fresh, full-strength strip at the end of the four (4) month period or when effectiveness diminishes.

STORAGE AND DISPOSAL

Storage: Do not contaminate water, food or feed by storage or disposal. Do not open or remove from package before ready to install. Store in a cool dry place. **Disposal: If empty:** Do not reuse container. Place in trash or offer for recycling if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

Proposition 65: Warning: This product contains a chemical known to the State of California to cause cancer. [OPTIONAL FOR USE IN CALIFORNIA]

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 USA.
www.amvac-chemical.com
1-323-264-3910

MARKETING CLAIMS:

How it works: The Amvac Small Insect Strip utilizes controlled release technology to slowly diffuse a deep penetrating vapor in enclosed spaces for up to 4 months. The clean, odorless vapor is evenly distributed throughout the enclosed treatment area, killing visible and hidden insects on contact and preventing new insect infestations (while you're away).

Controlled release (technology) • Continuous (slow) release technology (action) • Sustained release (technology) Kills flying and crawling insects as listed • Leaves No Odor • Clean, Odorless, deep penetrating vapor (action) • No-mess vapor technology • Leaves no mess (residue) • Non-staining • Will not damage natural or synthetic materials • Lasts up to four (4) months • Keeps protecting (insects out) for up to 4 months • Works up to 4 months • Long term (enclosed) space protection • Continuous (insect) protection for up to 4 months • Tired of nuisance or dangerous insects invading your space? • Works before you get there, so you will be insect free

(Just) Hang or stand up in: Homes (for use only in closets, wardrobes, and cupboards), Garages, Storage Units, Attics and more (others)*

*See back for details

PRODUCT FACTS	
<p>What It Does: Kills Flying and Crawling Insects including: Flies, Gnats, Mosquitoes, Moths, Silverfish, Cockroaches, Spiders, Beetles, Earwigs and other listed insects.</p>	<p>Where to Use: Garages, Storage Units, Enclosed Crawl Spaces, Closets, Wardrobes, and Cupboards</p> <p>Questions & Comments: Call [telephone number] or visit our website at [web address]</p>

STOP! READ ENTIRE LABEL BEFORE USE.

DIRECTIONS FOR USE

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

Remove pre-assembled (*product name*) from sealed bag when ready to use. Place in desired location away from windows and out of reach of children and pets. Drafts, weather and other conditions may affect the performance, but treatment usually lasts for four (4) months. One 5.25 g strip will treat 25 to 50 cu. ft. One 10.5 g strip will treat 50 to 100 cu. ft. One 16 g strip will treat 100-200 cu. ft. Record the date of installation and replace with a new, fresh, full strength strip at the end of four (4) months or when effectiveness diminishes. Do not use in food/feed processing or food/feed manufacturing or food/feed service establishments. Non-food/feed areas of these establishments where the product can be used are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and product storage (after canning or bottling). This product controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, earwigs, and other insects as listed.

WHERE TO USE

FOR USE IN THE FOLLOWING:

GARAGES, ATTICS, CRAWL SPACES, BOATHOUSES

Controls flies, mosquitoes, gnats and other insects as listed.

WITHIN HOMES, USE ONLY IN CLOSETS, WARDROBES, AND CUPBOARDS. ALSO FOR USE IN STORAGE UNITS AND STORAGE BINS.

Gives continuous protection against moths, silverfish, cockroaches and other insects, as listed, in closets, wardrobes, cupboards, storage units and storage bins for up to four (4) months and leaves no odor. Remove strip from sealed bag and hang or stand on wardrobe or closet rail, ensuring that the strip does not contact clothes or fabrics and that air can circulate around the strip. Keep the space closed. One 5.25 g strip will treat a space of 25 to 50 cu. ft. for up to four (4) months. One 10.5 g strip will treat a space of 50 to 100 cu. ft. for up to four (4) months. One 16 g strip will treat a space of 100-200 cu. ft. for up to four (4) months. If more than one is required, distribute them over the space equally. Record the date of installation so that the old strip may be replaced with a new, fresh, full strength strip at the end of the four (4) month period or when effectiveness diminishes.

Do not use more than the number of strips recommended for the space to be treated. Do not use where unwrapped food is stored or allow the strip to come into contact with food or cooking utensils. Do not allow children or pets to play or to sleep in these areas when treatment is in progress.

GARBAGE CANS AND TRASH DUMPSTERS

For control of flies in garbage cans and dumpsters, attach appropriate sized strip (One 5.25 g strip will treat 25 to 50 cu. ft. One 10.5 g strip will treat 50 to 100 cu. ft. One 16 g strip treats 100-200 cu. ft.) inside can or dumpster. Keep lid on can and dumpster closed.

7 7 7

ATTICS, GARAGES, AND ENCLOSED CRAWL SPACES

FOR USE AS A FLY KILLER

Kills flies and other insects as listed for up to four (4) months. Remove from sealed bag and hang or stand, out of reach of children and pets, in an open space of an enclosed area, away from windows. One 5.25 g will treat 25-50 cu. ft. which is about equal to a space of 8' x 3' x 2' for up to four (4) months. One 10.5 g will treat 50-100 cu. ft. which is about equal to a space 8' x 6' x 2' for up to four (4) months. One 16 g will treat 100-200 cu. ft. which is about equal to a space of 8' x 8' x 3' for up to four (4) months. In a larger space if more than one strip is required, keep them at least 10 feet apart. Record the date of installation so that the old strip may be replaced with a new, fresh, full strength strip at the end of the four (4) month period or when effectiveness diminishes.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

GUARANTEED RESULTS OR YOUR MONEY BACK

If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.