

16-181

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 19 2003

Mr. Tom McEntee
Dragon Chemical Corp.
P.O. Box 7311
Roanoke, VA 24019

Dear Mr. McEntee:

Subject: Revised Labeling
Ro-Pel® Animal Repellent
EPA Registration No. 16-181
Your Submission E-mailed on November 21, 2003

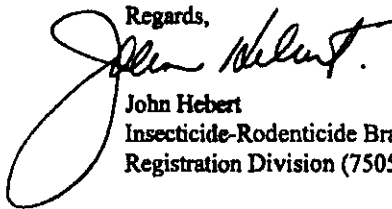
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following changes indicated below before you release the product for shipment bearing the amended labeling:

1. In the Active Ingredient statement revise the name of the first active to "Denatonium Saccharide." Also, "Active Ingredients" and "Inert Ingredients" must appear in the same point size.
2. The acute toxicity profile for your product is toxicity category IV for all routes of exposure. Your product is a non-dermal sensitizer. Therefore, you may delete all First Aid statements. The following may also be deleted from the Hazards to Humans and Domestic Animals: "Applicators and handlers must wear.....face shield)."
3. Delete "For best results" from the phrase, "For best results.....following methods."

Please note that there may still be outstanding efficacy data requirements for this product associated with the thymol RED. We are currently reviewing the requirements and may request efficacy data in the near future.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy is enclosed for your records. If you have any questions, please contact me at (703) 308-6249 or hebert.john@epa.gov.

Regards,



John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505C)

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 19 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
16-181



RO-PEL ANIMAL, RODENT AND BIRD REPELLENT

Stops specified animals and birds* from chewing, gnawing, licking, nibbling or biting.

ACTIVE INGREDIENTS:

Benzyldiethyl (2,6 xylyl carbamoyl) Methyl Ammonium Saccharide	0.065%
Thymol	0.035%
Inert ingredients:	99.900%
Total	100.00%

EPA Reg. No. 16-181
EPA Est. No. 16-VA-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautionary statements

(Net Contents 1c.t.)
*See list in directions for use.

PRECAUTIONARY STATEMENTS

CAUTION

Because of extremely unpleasant, bitter taste, avoid contact with mouth, eyes, skin, clothing, and food. Avoid breathing spray. Discard contaminated food. Applicators and handlers must wear rubber gloves and protective eyewear (safety glasses, goggles, or face shield). Wash hands with soap and water before eating drinking, chewing gum, using tobacco or using the toilet

FIRST AID	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222, the National Poison Control Hotline for emergency medical treatment information.</p>	
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> •Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15 to 20 minutes. •Call a poison control center or doctor for further treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> •Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. •Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye. •Call a poison control center or doctor for further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> •Call 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 the poison control center or doctor. •Do not give anything by mouth to an unconscious person.

ENVIRONMENTAL HAZARD

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

STORAGE & DISPOSAL

STORAGE: Store in original container, in a dry place inaccessible to children and pets.
DISPOSAL: If Empty: Do Not reuse this container. Place in trash or offer for recycling if available.
 If Partly Filled: Call your local solid waste agency or call CHEMTREC AT 1-800-424-9300 for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE

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

USE RESTRICTONS

DO NOT USE THIS PRODUCT ON EDIBLE CROPS. DO NOT USE ON SUGARING MAPLE TREES. ONLY APPLY OUTDOORS.

PRE-APPLICATION DIRECTIONS:

1. DAMAGE TO PLANTS (PHYTOTOXICITY) This product does not cause damage to plant tissues, however, because plant susceptibility varies widely, test ROPEL on a few leaves or blossoms for plant damage before treating entire plantings and use only on seeds tested first for effects on germination.
2. DAMAGE TO PAINTED/STAINED SURFACES, FABRICS & PLASTICS: Test a small area to determine if ROPEL will damage these surfaces.
3. READY-TO-USE ROPEL must be used at full strength. Do not mix this product with any other chemical.
4. EQUIPMENT: Do not use mist blowers or ultra-low volume application equipment to apply this product.

5. SURFACE CONDITIONS: Surfaces to be treated must be dry. Do not apply this product on rainy, snowy or windy days, or if precipitation is predicted within the next 24 hours. Do not irrigate treated plants within 24 hours before or after application.

6. TEMPERATURE CONDITIONS: Do not use this product at temperatures below 32° F or above 90° F

7. COVERAGE: One gallon of RO-PEL will properly treat 1,000 to 4,000 sq. ft., depending upon surface conditions and porosity of items being treated.

TO PREVENT GRAZING, NIBBLING, BITING, EATING, LICKING, CHEWING, GNAWING AND BROWSING DAMAGE: inflicted by deer (*Odocoileus*), beaver (*Castor*), rats (*Rattus* spp.), dogs (*Canis*), and cats (*Felis catus*): Apply RO-PEL full strength. Do not mix with any other chemicals. Do not apply on rainy or windy days. Treat surfaces you wish to protect until ALL surfaces are completely wet. Allow surfaces to dry, then apply as a second treatment.

For best results apply RO-PEL by the following methods.

TO PROTECT TREES, POLES, FENCES, SIDING OUTDOOR FURNITURE and SIMILAR OBJECTS: Treat all surfaces to be protected with a coarse sprayer (such as a tank sprayer) or by painting with a brush until treated surfaces are completely wet.

TO PROTECT SHRUBS, ORNAMENTAL PLANTS, GRASS & FLOWERS: Treat all surfaces (including both sides of leaves) with a coarse sprayer until wet.

TO PROTECT GARBAGE: Treat bags of garbage and exposed garbage with a coarse sprayer on all surfaces to be protected, including the trash container, until all surfaces are wet. Allow to dry before handling.

TO PROTECT SEEDS OR BULBS FROM BIRDS AND SQUIRRELS: Soak in RO-PEL for one minute and allow to dry. (Use rubber gloves.) Plant in normal manner.

RE-APPLICATION DIRECTIONS:

To improve effectiveness, make a second application in 2-7 days.

NOT FOR USE ON EDIBLE CROPS!

WARRANTY STATEMENT: The proper storage, use and disposal are beyond our control. Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material especially when such use and handling are contrary to label instructions.

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Manufactured by:

Dragon Chemical Corp.

P. O. Box 7311, Roanoke, VA 24019, www.dragonchemical.com