

Page 1 of 6  
26 FEB 1992

Carolyn Bussey  
Ciba-Geigy Corporation  
Agricultural Division  
P.O. Box 18300  
Greensboro, NC 27419

Subject: Logic<sup>R</sup> Fire Ant Killer  
EPA Reg. No. 100-725  
Your letter of 12/19/91 relative to our letters of  
12/10/91

Dear Ms. Bussey:

In reference to your letter dated above, we offer to you the following comments:

On December 10, 1991, in response to your application dated November 12, 1991, we sent a letter to you which indicated that the product referenced above would be processed in accordance with FIFRA section 6(f)(1) for the purpose of a Use Deletion and published in the Federal Register for a period of 90 days. On further consideration we feel that this California restriction does not constitute a deletion of uses. This letter serves as notification to rescind our letter, dated December 10, 1991 regarding Use Deletion effective the stamped date of this letter.


For your information we wish to point out to you at this time that we do not feel that it is appropriate to offer uses on a label and then tell the user that the product cannot be used for those purposes even though it only applies to one state. You might consider using a separate label when marketing the product in California.

We are also withdrawing our letter dated December 10, 1991 regarding a submission dated August 20, 1991. We understand that Ciba-Geigy made no such submission for this product.

Stamped copy of the labeling submitted with your application dated November 12, 1991 is enclosed for your records. The labeling should be amended at the next printing as follows:

1. Delete "Harmful if swallowed" and add the statements "Harmful if absorbed through skin or inhaled. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.
2. Add the following to the Statement of Practical Treatment-  
If inhaled: Remove victim to fresh air or if not breathing give artificial respiration, preferably mouth to mouth. Get medical attention.
3. At the next label printing, delete the word "natural" from the label found under the heading "How Logic Fire Ant Killer Works". This represents a false or misleading statement to the purchaser and is not in accordance with 40 CFR 156.10 (5) (x) (A).

Sincerely,

  
Richard F. Mountfort  
Product Manager 10  
Insecticide/Rodenticide Branch  
Registration Division (H7505C)

Logic<sup>R</sup> Fire Ant Killer

An Insect Growth Regulator For the Control of Fire Ants\*

EASY-TO-USE FORMULA

Active Ingredient:

Fenoxycarb: (ethyl [2-(4-phenoxyphenoxy) ethyl] carbamate).....1%

Inert Ingredients: .....99%

Total: 100%

EPA Reg. No. 100-725

EPA Est. 602-MO-1

PRODUCT ID. 58700 (on case only)

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back panel.

10 oz.

Net Weight

\* IN CA HOME LAWN USE ONLY

CIBA-GEIGY

ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
26 FEB 1992  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the purpose  
registration under FIFRA, No.  
100-725

DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire Directions for Use and Conditions of Sale and Warranty before using this product. If terms are not acceptable, return the unopened product container at once.

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Conditions of Sale and Warranty

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The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of CIBA-GEIGY or the Seller. All such risks shall be assumed by the Buyer.

CIBA-GEIGY warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. CIBA-GEIGY makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall CIBA-GEIGY or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. CIBA-GEIGY and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of CIBA-GEIGY.

HOW LOGIC FIRE ANT KILLER WORKS

Logic Fire Ant Killer is a unique combination of a natural food-like bait and a patented Insect Growth Regulator (IGR). Fire ants seek out the bait, take it back to the mound and feed it to the queen and other fire ants. The active ingredient (IGR) breaks the reproductive cycle. Without new fire ants to forage for food, the queen and her colony die of starvation, usually in 4 to 6 weeks, depending on the size of the mound. FOR 7-10 DAYS AFTER TREATMENT, DO NOT APPLY ANY OTHER FIRE ANT PESTICIDE. THIS IS TO ALLOW SUFFICIENT TIME FOR THE WORKER ANTS TO SEEK OUT THE BAIT AND TAKE IT BACK TO THE MOUND.

DIRECTIONS FOR USE

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

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND ALL PRECAUTIONS ON THIS LABEL MAY RESULT IN GRASS INJURY, ADVERSE EFFECTS TO NON-TARGET ORGANISMS, OR POOR INSECT CONTROL.

SITES

Logic Fire Ant Killer is for use on lawns\*, turf, and non-agricultural land.

\* IN CALIFORNIA, LOGIC FIRE ANT KILLER IS CURRENTLY LIMITED TO USE ONLY ON HOME LAWNS AND IN THE LANDSCAPED AREAS AROUND THE HOME. DO NOT USE THIS PRODUCT IN CALIFORNIA ON OTHER SITES.

When to Apply

Logic should be applied in early Spring, at the first sign of fire ant activity. If you live in an area of heavy fire ant infestation, you may want to make a second application 8 to 12 weeks after the initial treatment.

Logic should be applied during late afternoon. Avoid application during the heat of the day or if rain is expected within 4 to 6 hours. Do not water your lawn for 24 hours after treatment. In very large mounds, some worker ants may persist for a while after the queen is dead.

How to Apply

For best results, treat as follows:

Sprinkle product thinly over yard using shaker side of top. The contents of this container will treat up to 27,000 sq. ft. when

**BEST AVAILABLE COPY**

used as broadcast yard treatment.

BROADCASTING LOGIC TO TREAT THE WHOLE YARD IS RECOMMENDED SINCE IT ELIMINATES FIRE ANT NESTS WHICH HAVE YET TO MOUND.

Storage and Disposal

Storage: Store away from heat. Keep container tightly closed and keep package dry. Store in a locked cabinet away from children or pets.

Disposal: Do not reuse container. Securely wrap container in several layers of newspaper and discard in trash.

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup or disposal of wastes. In the event of a major spill, fire, or other emergency, call 1-800-888-8372 day or night.

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

May be harmful if swallowed. Avoid breathing dust. Avoid contact with clothing, skin, or eyes.

Statement of Practical Treatment

In case of contact, flush skin or eyes with plenty of water. Get medical attention if irritation persists.

Environmental Hazards

This product is toxic to fish and aquatic invertebrates. Drift and runoff from treated areas may be hazardous to aquatic invertebrates in adjacent aquatic sites. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

Logic<sup>®</sup> trademark of CIBA-GEIGY

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Agricultural Division  
CIBA-GEIGY Corporation  
Greensboro, North Carolina 27419

CGA 121L1

November 12, 1991