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10/25/99

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Cristina Griffin Senoret Chemical Company c/o Delta Analytical Corporation 7910 Woodmont Avenue., Suite 1000 Bethesda, Maryland 20814

Subject: Amended Label Terro Ant Killer II EPA Registration Number: 149-8 Application Dated: June 24, 1999

Dear Ms. Griffin:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Remove the claim "KILLS THE QUEEN" and "KILL THE ENTIRE COLONY" from the label.

2. For future reference, claims stating "KILLS THE QUEEN" or "KILLS THE ENTIRE COLONY" must be substantiated by submitting efficacy data to the Agency.

3. Remove Black Carpenter Ants from the label. Uses for carpenter ants currently require submission or citation of data.

A stamped copy is enclosed for your records.

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If you have any questions regarding this matter, please contact Melody Banks on (703) 305-5413. In addition, you may contact Mr. Kevin Sweeney (703) 305-5063 for further guidance on efficacy requirements.

Sincerely.

Marion J. Johnson, Jr. Product Manager 10 Insecticide Branch Registration Division 7505c

NAL CARRENTS In Mark Learny Dated: 10125/99 **TERRO** ® Under the Federal Insecticide, Fungicide, und Medenticide Act, as amended, for the pesticide **ANT KILLER II** registered under EPA Reg. No. 149-8 For Control of Sweet Eating Ants * Kills the Queen and kills the colony * Kills the ants you see and the ants you don't * Liquid ant bait * Do it yourself liquid bait system * No unpleasant odors * Contains Borax * Use Indoors * Use Outdoors * Liquid Ant Killer * Hate em Bait em * Liquid Ant Bait Solution * Attracts Ants Fast * 5.4% Concentrate saves time and money Active Inaredient:

Sodium Tetraborate Decahydrate (Borax)	5.40%
Other Ingredients:	<u>94.60%</u>
Tota	l 100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

NET CONTENTS:

SENORET CHEMICAL CO., INC.

ST. LOUIS, MO., 63122 U.S.A.

Phone: (24 hour emergency): 1-800-228-5635, ext 50 www.Terro.com

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DIRECTIONS FOR USE

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

FOR USE IN AND AROUND: Homes, Hospitals, Restaurants, Apartments, Grocery Stores, Institutional Buildings, Schools, Cafeterias, Warehouses, Storage Areas, Food Processing Plants, Mobile Homes, Boats, Military Bases, Theaters, Nursing Homes, and on Military, Commercial, and Cruise Ships.

ATTRACTS AND KILLS ALL COMMON HOUSEHOLD ANTS INCLUDING: Black Carpenter ants, Argentine ants, Ghost ants, Cornfield ants, Pavement ants, Acrobat ants, White footed ants, Little black ants, Odorous house ants, Crazy ants, Big headed ants, and other sweet eating ants.

USING TERRO® ANT KILLER II: Tear pieces of cardboard from the carton along the perforated lines. (Small pieces of paper, cardboard, or foil also may be used). Apply the product to the cardboard and place product where ants are seen, such as the edges of sinks, tubs, window sills, under food cabinets, along floors and baseboards and in corners. Do not skimp on bait placements; the more bait placements the better. Since invading ants usually have outdoor nesting sites, it often helps to put the product outside, close to where ants are found entering the structure. Ants typically follow defined trails from the nest to food or water. Placing TERRO® Ant Killer II close to these trails will improve control.

CONTROLLING AND ELIMINATING ANTS: First ants will come in large numbers, but soon disappear. Ants carry TERRO® Ant Killer II back to their nests, often eliminating the entire colony. This product is specifically formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a lethal dose to the queen of the colony. The key to obtaining effective control is to monitor the placements and ensure there is always a fresh supply of TERRO® Ant Killer II on each placement. Complete control may take up to two weeks.

DO NOT USE in edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed. Avoid contamination of feed and foodstuffs. Place bait in areas inaccessible to children and pets.

For further information on successful ant control using the TERRO® brand of ant control products, visit our web site (www.Terro.com).

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TERRO ® Ant Killer II can be diluted with water to obtain a 1% or 2% solution of Borax. Such a dilution is helpful when you plan on using a substantial volume of Terro® Ant Killer II in a baiting program designed to control very large multi-queen and multi-colony ant infestations.

1% Dilution: 1 part TERRO ® Ant Killer II to 5 parts water. Mix thoroughly.

2% Dilution: 1 part TERRO ® Ant Killer II to 2 parts water. Mix thoroughly.

COMMON DILUTIONS

TERRO	+	WATER	=	FINISHED PRODUCT
5 fl. oz.	+	25 fl. oz <i>.</i>	=	1 Quart (approximately)
20 fl. oz.	+	100 fl. oz.	=	1 Gallon (approx.)
1 gallon	+	5 gallons	=	6 Gallons

2% Dilution

1% Dilution

TERRO	+	WATER	÷-	FINISHED PRODUCT
10 fl. oz.	+	20 fl. oz.	-	1 Quart (approximately)
42 fl. oz.	+	84 fl. oz.	=	1 Gallon (approx.)
1 gallon	+	2 gallons	=	3 Gallons

USING TERRO® ANT KILLER II IN BAIT STATIONS: Apply the 1% or 2% Terro® Ant Killer II solution using bait stations designed to hold liquid bait. This product will work well in most bait stations such as those made by B&G, Kness, and Whitmire Micro-Gen. Follow directions included with the bait stations to obtain best results.

STORAGE AND DISPOSAL

STORAGE: Store in a cool dry place. Do not store where children or animals may gain access. **DISPOSAL:** Securely wrap original container in several layers of newspaper and

DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

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