

149-8

12/19/2013

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

DEC 19 2013

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Mark A. Mongiovi
Senoret Chemical Company, Inc.
69 N. Locust Street
Lititz, PA 17543-0327

Subject: Label Notification(s) for Pesticide Registration 98-10

Dear Mr. Mongiovi:

Subject: Notification to Add Graphics & Symbols
EPA Registration Number: 149-8
Date of Submission: October 21, 2013
Decision: 484294

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated October 21, 2013, for the product TERRO® Ant Killer II. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) and/or label submitted with the application has (have) been stamped "Notification" and will be placed in our records.

If you have any questions, please contact Melody Banks on 703 305-5413 or via email @banks.melody@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Richard Gebken".

Handwritten initials "fa" in black ink, positioned to the left of the typed name.

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7504P)

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98



EPA

United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other: NOTIFICATION**

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 149-8	2. EPA Product Manager Mr. Mark Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
2. Company/Product (Name) Senoret Chemical Company, Inc. / TERRO® Ant Killer II	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Senoret Chemical Company, Inc. 69 N. Locust Street Lititz, PA 17543-0327 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with NOTIFICATION action 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: DEC 19 2013 EPA Reg. No. _____ Product Name _____	

Section - II

- Amendment - Explain below.
- Resubmission in response to Agency letter dated _____
- Notification - Explain below.
- Final printed labels in response to Agency letter dated _____
- "Me Too" Application
- Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of Label Action per PR-Notice 98-10: Graphics & Symbols: Please see attachment

This notification is consistent with the provisions of PR NOTICE 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make false statements to EPA. I further understand that if this notification is not consistent with the terms of PR NOTICE 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt. Net: 0.4oz.	No. per container From 1-20	<input type="checkbox"/> Glass	<input checked="" type="checkbox"/> Paper
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Net: 0.4oz to 8oz		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Other <u>Printed onto folding carton or printed onto a blister pack</u>	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Chad L. Mateer	Title Regulatory Affairs Manager	Telephone No. (Include Area Code) 717-626-2125 x426

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Regulatory Affairs Specialist	6. Date Application Received (Stamped)
4. Typed Name Mark A. Mongiovi	5. Date 10-21-2013	

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69 N. Locust Street
P.O. Box 327
Lititz, PA 17543-0327
(717) 626-2125
Fax: (717) 626-1912

October 21, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

ATTN: Notification Division

SUBJECT: Notification of Label Action per PR-Notice 98-10: Graphics & Symbols

TERRO® Ant Killer II (EPA Reg. No. 149-8)

To Whom It May Concern,

Senoret Chemical Company is hereby submitting a Notification of Label Action per PR-Notice 98-10 for the subject product's label. The purpose of this label notification is to add graphics and symbols.

Accordingly, please find the following documents in support of the application:

1. Application for Pesticide Registration (Form 8570-1) for the subject product.
2. One (1) copy of the proposed master label for the subject product with changes highlighted.
3. One (1) clean copy of the proposed master label for the subject product.

If you have any questions and/or need any additional information, please contact me at (717) 626 – 2125 ext.: 219 or mmongiovi@woodstream.com.

Sincerely,

Mark Mongiovi
Regulatory Affairs Specialist
Senoret Chemical Company



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[MASTER LABEL – COVER PAGE]

TERRO® ANT KILLER II

For Control of Sweet Eating Ants

- [Alternate brand name: TERRO® OUTDOOR LIQUID ANT BAITS]
- [Alternate brand name: TERRO® ANT KILLER II LIQUID ANT BAITS]
- [Alternate brand name: TERRO® OUTDOOR LIQUID ANT BAIT STAKES]
- [Alternate brand name: TERRO® OUTDOOR LIQUID ANT STAKES]
- [Alternate brand name: TERRO® ANT KILLER II LIQUID ANT BAITS BONUS PACK]

- * Liquid ant bait
- * Contains Borax
- * Use Indoors
- * Liquid Ant Killer
- * Liquid Ant Bait Solution
- * 5.4% Concentrate saves time and money
- * Kills the ants you see and the ants you don't
- * Attracts and kills all common household ants

- * Do it yourself liquid bait system
- * No unpleasant odors
- * Use Outdoors
- * Hate em Bait em
- * Attracts Ants Fast
- * Indoor/Outdoor [Protection]

NOTIFICATION

DEC 19 2013

Active Ingredient:

Sodium Tetraborate Decahydrate (Borax)	5.40%
Other Ingredients:	94.60%
Total.....	100.00%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

NET CONTENTS:

[___ Bait Stations ___ Bait Stakes ___ fl. oz. (___ ml) / ___ fl. oz. (___ ml) each]

**SENORET CHEMICAL CO., INC.
69 NORTH LOCUST STREET
LITITZ, PA 17543**

Phone: (24 hour emergency): 1-800-800-1819
www.Terro.com

Terro® is a registered trademark of Senoret Chemical Company, Inc.

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[MASTER LABEL – BACK PANEL PAGE 1 OF 3]

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: 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. 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 dose to the rest 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.

USING TERRO® BAIT BULLETS: This package contains TERRO® Ant Killer II and TERRO® Bait Bullets. Fill the TERRO® Bait Bullets half full with TERRO® Ant Killer II and place them, out of reach of children and pets, on a flat surface close to areas where ants are seen foraging or nesting. As the ants begin to feed on the bait you will notice many ants inside and around the opening to the Bait Bullet. If the ants consume the entire bait, simply refill the Bait Bullet.

USING TERRO® BAIT BULLETS AS A PERIMETER ANT DEFENSE SYSTEM: Take a few minutes to locate areas close to your home where ants are seen trailing. Place the Bait Bullets against the foundation where you have located ant movement. Space the Bait Bullets every 5 to 10 feet for maximum coverage. Check the Bait Bullets regularly for activity. Remember ants will feed on TERRO® Ant Killer II and carry the bait back to the rest of the colony. Heavy infestations may require several bait placement refills and up to two weeks to control.

USING TERRO® ANT KILLER II PRE-FILLED BAIT SYSTEM: Terro® Ant Killer II now comes as an easy to use pre-filled liquid ant bait [for outdoor use]. Ants will enter, feed and return to the nest where they will pass on the Terro® Ant Killer II to the rest of the colony.

- \$ Pre-filled
- \$ Ready to Use
- \$ No drips, spills, or mess

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[MASTER LABEL – BACK PANEL PAGE 2 OF 3]

1. Break pre-filled TERRO® Ant Killer II baits apart from plastic frame.
2. Hold baits upright and [cut along dotted line at the top] or [cut off orange colored section] or [Hold the pre-filled bait station level and peel back clear {or other appropriate descriptive term} seal to expose entry point to bait.]
3. Place baits label side up near ant trails or close to where ants are numerous. Place additional TERRO® Ant Killer II baits anywhere ants may enter your home. For best results, use [all] [number] baits to ensure sufficient supply for the ants.
4. Monitor regularly for activity but do not interfere with the ants or baits. Replace with additional baits when first set is depleted.
5. Once ants are controlled, replace TERRO® Ant Killer II baits every 3 months to keep ants from returning.

TERRO® OUTDOOR LIQUID ANT BAIT STATIONS:

1. REMOVE STAKES by pulling them straight out from underneath cup.
DO NOT REMOVE CUP.
2. [PUSH DOWN on the top of the cup, then twist cup 1/4 turn.] [Slide cup over bait reservoir. Cup will lock into place. Twist cup [1/4][1/2][full] turn.] The foil seal under the cup will be punctured and the liquid bait will drip into the reservoir in the base. **KEEPS BAIT LEVEL TO AVOID SPILLING.**
3. PLACE BAIT STATIONS outdoors close to where ants are found entering your home, or where you see ant nests or their trails.
4. SECURE BAIT STATIONS to the ground, if desired, by inserting the 2stakes provided through the holes in the base.
5. ANTS WILL ENTER the bait station through the holes at the top of the ramps.
6. MONITOR regularly for activity, but do not interfere with the ants or baits. Replace baits every three months to keep ants from returning. Complete control may take up to two weeks.
7. CALL US at 1-800-800-1819 if we can be of assistance.

TERRO® OUTDOOR LIQUID ANT BAIT STAKES [TERRO® OUTDOOR LIQUID ANT STAKES]:

1. PLACE BAIT STATIONS outdoors close to where ants are found entering your home, or where you see ant nests or their trails.
2. Insert Terro® Outdoor Liquid Ant [Bait] Stakes into area to be treated by pushing firmly into the ground with your hand until the bottom of the bait stake contacts the ground. DO NOT use your foot or a tool to place in ground.
3. Keeping bait stake upright, hold firmly with one hand while breaking off bait pack tab.
4. Ants will enter the bait stake through the hole created by removing the bait pack tab.
5. Monitor regularly for activity, but do not interfere with the ants or baits.
6. Replace baits every three months or when bait level is no longer visible through [bait window] [stake window] [see-through monitor]. Complete control may take up to two weeks.
7. Call us at 1-800-800-1819 if we can be of any assistance!

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).

[] denote optional language; words in italics are notes to label reviewer and will not appear on market label

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[MASTER LABEL – BACK PANEL PAGE 3 OF 3]

PEST CONTROL OPERATORS

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

1% Dilution

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

2% 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

Do not contaminate water, food, or feed by storage and disposal.

STORAGE: Store in a cool dry place. Do not store where children or animals may gain access.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable Container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[MASTER LABEL – OPTIONAL CLAIMS PAGE 1 OF 6]

[Optional Market Claims – [TERRO® OUTDOOR LIQUID ANT BAIT STAKES] [TERRO® OUTDOOR LIQUID ANT STAKES]]

- [10] [8] [6] [4] [2] stakes
- 8+2 stakes {Note to reviewer: For use on packages containing 10 stakes – consumer receives 2 additional stakes than the regular 8 stake package}
- 2 [free] stakes [free] {Note to reviewer: For use on packages containing 10 stakes – consumer receives 2 additional stakes than the regular 8 stake package}
- Bonus Pack {Note to reviewer: For use on packages containing 10 stakes – consumer receives 2 additional stakes than the regular 8 stake package}
- 25% More {Note to reviewer: For use on packages containing 10 stakes – consumer receives 2 additional stakes than the regular 8 stake package}
- 8 10 stakes {Note to reviewer: For use on packages containing 10 stakes – consumer receives 2 additional stakes than the regular 8 stake package}
- 8 +2 stakes free {Note to reviewer: For use on packages containing 10 stakes – consumer receives 2 additional stakes than the regular 8 stake package}
- Tiered steps for [easy] bait access
- Tiered steps for bait consumption
- Easy bait access with built-in steps [stairs]
- Steps for easy bait access
- As bait is consumed ants are able to continuously descend into the reservoir until all bait is gone
- Tiered bait pack reduces the chance of ants drowning so that ants are able take the bait back to feed the colony.
- Tiered steps [stairs] for easy access to bait
- Bait Pack ledges for easy bait access
- Tiered bait pack for increased bait consumption
- Sealed bait stays fresh until opened
- Twist [Break] [off bait pack tab] to activate [open]
- Easy to open- simply twist [break] [off bait pack tab].
- Twist Tab - keeps liquid ant bait fresh until you are ready to use
- Easy to use
- Stay-Fresh twist tab
- Reinforced stake ridges for added strength
- Bait Window [Stake Window]- allows you to monitor liquid bait levels
- See-thru window allows you to easily monitor liquid bait
- See-thru bait monitor – know when to replace stake
- Unique Bait Monitor – lets you know when it is time to replace the stakes
- Bait monitor [window]
- Unique See-thru bait monitor [window]
- Made in the USA
- Liquid bait technology offers ants both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids
- 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 dose to the rest of the colony. Ants can't live without water. TERRO Liquid Ant Bait contains both a food and water source for ants. TERRO liquid ant bait is formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.

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[MASTER LABEL – OPTIONAL CLAIMS PAGE 2 OF 6]

[Optional Market Claims - TERRO® OUTDOOR LIQUID ANT BAIT]

- [6] [8] Stations
- 6+2 Free {*Note to reviewer: For use on packages containing 8 bait stations – consumer receives 2 additional bait stations than the regular 6 bait station package*}
- Bonus Pack {*Note to reviewer: For use on packages containing 8 bait stations – consumer receives 2 additional bait stations than the regular 6 bait station package*}
- Value Pack {*Note to reviewer: For use on packages containing 8 bait stations – consumer receives 2 additional bait stations than the regular 6 bait station package*}
- 2 FREE Stations {*Note to reviewer: For use on packages containing 8 bait stations – consumer receives 2 additional bait stations than the regular 6 bait station package*}

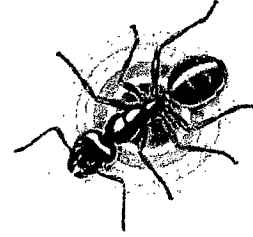
[Optional Market Claims – TERRO® ANT KILLER II LIQUID ANT BAIT BONUS PACK]

- 1 Free outdoor liquid Ant bait stake
- 2 Free outdoor liquid ant bait stakes
- Value Pack/Bonus Pack
- Tiered steps for [easy] bait access
- Tiered steps for bait consumption
- Easy bait access with built-in steps [stairs]
- Steps for easy bait access
- As bait is consumed ants are able to continuously descend into the reservoir until all bait is gone
- Tiered bait pack reduces the chance of ants drowning so that ants are able take the bait back to feed the colony.
- Tiered steps [stairs] for easy access to bait
- Bait Pack ledges for easy bait access
- Tiered bait pack for increased bait consumption
- Sealed bait stays fresh until opened
- Twist [Break] [off bait pack tab] to activate [open]
- Easy to open- simply twist [break] [off bait pack tab].
- Twist Tab - keeps liquid ant bait fresh until you are ready to use
- Easy to use
- Stay-Fresh twist tab
- Reinforced stake ridges for added strength
- Bait Window [Stake Window]- allows you to monitor liquid bait levels
- See-thru window allows you to easily monitor liquid bait
- See-thru bait monitor – know when to replace stake
- Unique Bait Monitor – lets you know when it is time to replace the stakes
- Bait monitor [window]
- Unique See-thru bait monitor [window]
- Made in the USA
- Liquid bait technology offers ants both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids
- 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 dose to the rest of the colony.
- Ants can't live without water. TERRO Liquid Ant Bait contains both a food and water source for ants. TERRO liquid ant bait is formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.

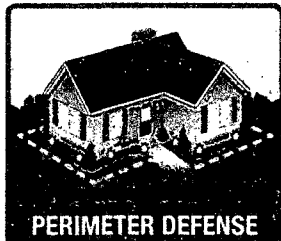
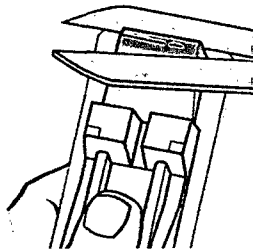
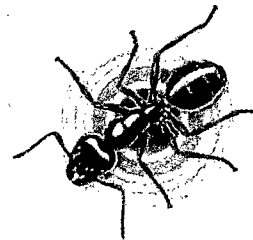
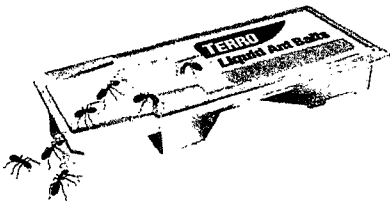
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[MASTER LABEL – OPTIONAL CLAIMS PAGE 3 OF 6]

[Optional Graphics – Terro® Ant Killer II]



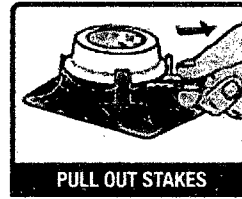
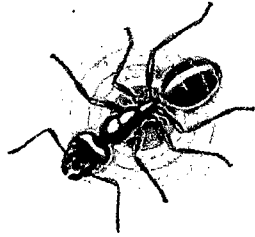
[Optional Graphics – Terro® Ant Killer II Liquid Ant Baits]



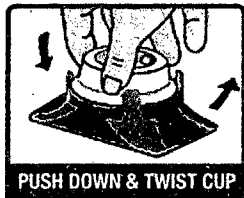
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[MASTER LABEL – OPTIONAL CLAIMS PAGE 4 OF 6]

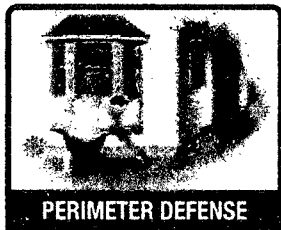
[Optional Graphics – Terro® Outdoor Liquid Ant Baits]



PULL OUT STAKES



PUSH DOWN & TWIST CUP



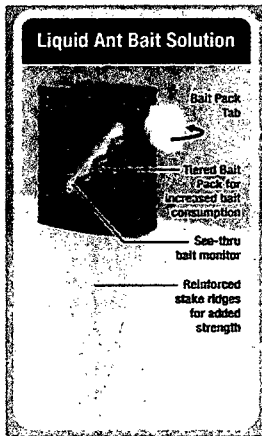
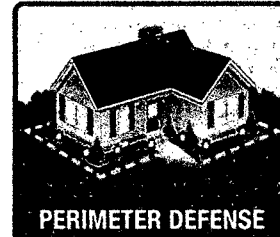
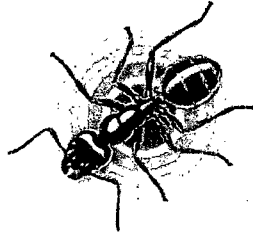
PERIMETER DEFENSE



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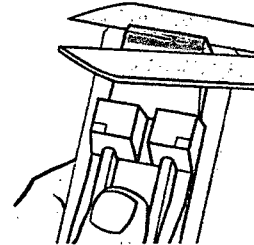
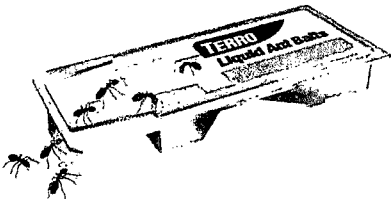
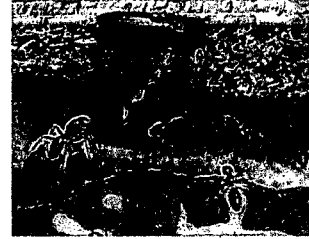
[MASTER LABEL – OPTIONAL CLAIMS PAGE 5 OF 6]

[Optional Graphics – Terro® Outdoor Liquid Ant Bait Stakes, Terro® Outdoor Liquid Ant Stakes]



[MASTER LABEL – OPTIONAL CLAIMS PAGE 6 OF 6]

[Optional Graphics – Terro® Ant Killer II Liquid Ant Baits Bonus Pack]



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ATTACHMENT TO 10-21-2013 NOTIFICATION PER PR-NOTICE 98-10 (Page 1 of 4):

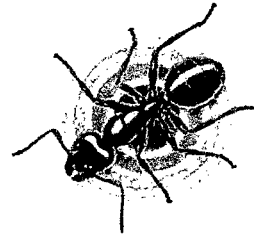
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EPA Reg. No. 149-8

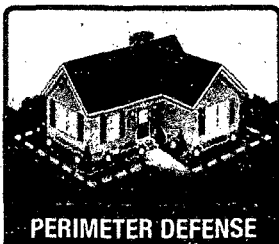
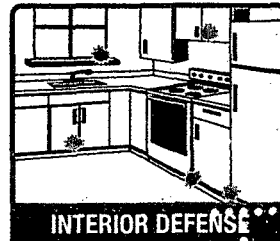
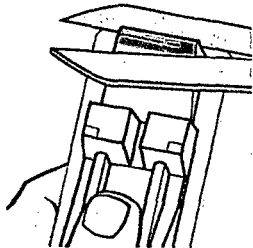
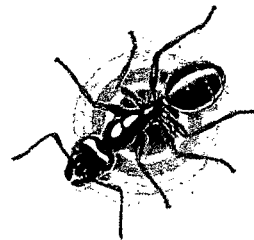
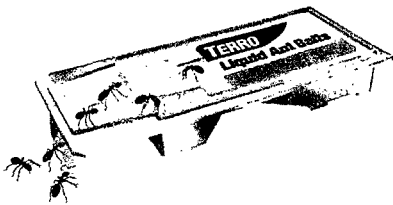
Graphics & Symbols-

[MASTER LABEL – OPTIONAL CLAIMS PAGE 3 OF 6]

[Optional Graphics – Terro® Ant Killer II]



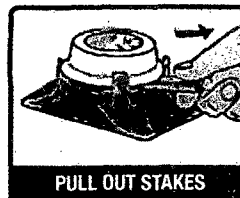
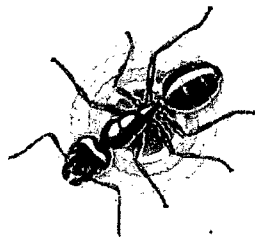
[Optional Graphics – Terro® Ant Killer II Liquid Ant Baits]



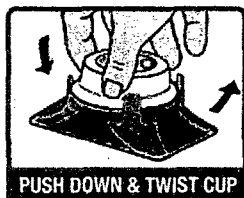
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ATTACHMENT TO 10-21-2013 NOTIFICATION PER PR-NOTICE 98-10 (Page 2 of 4):

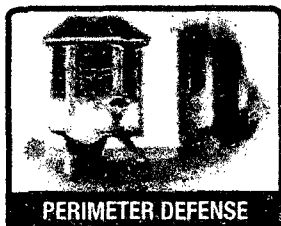
[Optional Graphics – Terro® Outdoor Liquid Ant Baits]



PULL OUT STAKES



PUSH DOWN & TWIST CUP



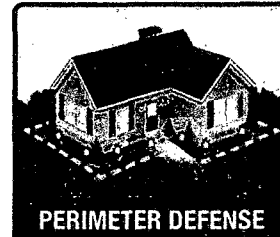
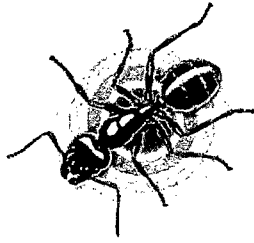
PERIMETER DEFENSE



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ATTACHMENT TO 10-21-2013 NOTIFICATION PER PR-NOTICE 98-10 (Page 3 of 4):

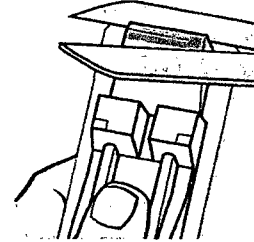
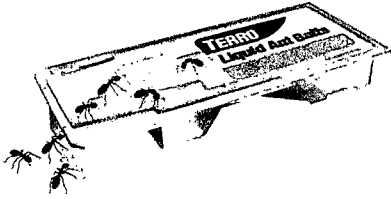
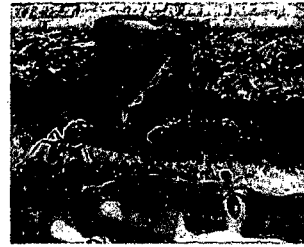
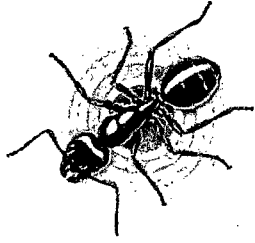
[Optional Graphics – Terro® Outdoor Liquid Ant Bait Stakes, Terro® Outdoor Liquid Ant Stakes]



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ATTACHMENT TO 10-21-2013 NOTIFICATION PER PR-NOTICE 98-10 (Page 4 of 4):

[Optional Graphics – Terro® Ant Killer II Liquid Ant Baits Bonus Pack]



This notification is consistent with the provisions of PR NOTICE 98-10 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make false statements to EPA. I further understand that if this notification is not consistent with the terms of PR NOTICE 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Mark Mongiovi

10-21-13

Mark Mongiovi
Regulatory Affairs Specialist
Woodstream Corporation