Please road instructions before co	21-1424		2-15-7	CC - (Form Agarayad	OMB No. 2070.	0060. Approval expires 05-31-98
≎ EPA	United States EPA Environmental Protection Ac Washington, DC 20460			Registrati		on	OPP Identifier Number
		Application	for Pesticio	le - Section	n l		
1. Company/Product Num 1021-1424	per		2. EPA Produ Richard G	-		3. Propose	d Classification
4. Company/Product (Name) PYROCIDE® Fogging Concentrate 7338			PM#			✓ None	Restricted
5. Name and Address of A	pplicant (<i>Include Zip Code</i>) ILEY KING COMPANY IE NORTH	,		nilar or identic	accordance wit		ction 3(c)(3)(b)(i), my ing to:
☐ Check if this	Product Name						
			Section - II				
Resubmissio	Explain below. In in response to Agency lett Explain below.	ter dated		. 0	Final printed Agency letter "Me Too" App Other - Expla	olication.	NOTIFICATION DEC 1 5 2004
Trouncation pursuant	to PR Notice 98-10 con			·			
4 14-4-7-17-1-17-1-18-1	U.D. Davisson die		Section - III				
1. Material This Product Wi Child-Resistant Packaging Yes* No *Certification must	Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per container	Water Soluble If "Yes" Package wgt.	Packaging Yes No	No. per container	2. Type of Metal Plast Glass	l ic s
be submitted 3. Location of Net Contents Label	I information Container	4. Size(s) Retai	I il Container		5. Location of	Label Direct On Label	(Specify) tions accompanying product
6. Manner in Which Label is	Lithograph Other Paper glued Stenciled						
0	(A		Section - IV	44			
	items directly below for iden		idual to be con	tacted, if nece	essary, to proce		
Name JULIE B. SCHLEKAU					(763) 544	No. (Include Area Code) -0341	
I acknowledge that any k both under applicable lav 2. Signature		3. Title	be punishable		-	θ.	6. Date Application Received (Stamped)
July B	Registration	Specialist	,		• • • •		
1. Typed Name JULIE B. SCHLEKAU	5. Date 11/11/2004				• * * * *	7	

DEC 1 5 2004

8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4372 U.S.A. - Telephone (763) 544-0341

For Use in Household and Food Processing Plants, Restaurants, Industrial Buildings: schools, warehouses, offices, theatres, garages, hotels, motels, hospitals and kennels. [Industrial] [Institutional]

[] Indicates alternate or optional wording

For use indoors as a ULV, space, area, contact spray or thermal fog for listed insects in areas specified on the label

Effective and fast acting

Provides flushing action and quick knockdown for indoor use as a ULV, space, area or contact spray

Authorized by USDA for use in edible product areas of official establishments operating under the Meat. Poultry. Shell Egg Grading and Egg Products Inspection Program

ACTIVE INGREDIENTS:

		Pyrethrins	1.00%
	•	Piperonyl butoxide, Technical	2.00%
	**	N-Octyl bicycloheptene dicarboximide	3.00%
***	OTH	ER INGREDIENTS	94.00%
		-	100 00%

- Equivalent to 1.60% (butylcarbityl) (6-propylpiperonyl) ether and 0.40% related compounds.
- ** MGK® 264, Insecticide Synergist
- *** Contains petroleum distillates

PYROCIDE, MGK® - Registered trademarks of McLaughlin Gormley King Company

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
IF SWALLOWED:	 Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or a doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.
IF IN EYES:	 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 eyes. Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING:	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 INHALED:	 Move person to fresh air. If person is not breathing, call 911 or an ambulance. Then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

NOTE TO PHYSICIAN: Contains petroleum distillates – vomiting may cause aspiration pneumonia. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information regarding medical emergencies or pesticide incidents, call the International Poison Center at 1-888-740-8712.

Net Contents

Manufactured by:

Mc LAUGHLIN GORMLEY KING COMPANY

8810 Tenth Avenue North Minneapolis, MN 55427

EPA Reg. No. 1021-1424

EPA Est. No. 1021-MN-2

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Wear a pesticide respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH-approved respirator with an organic vapor (OV) removing cartridge or canister with any R, P, or HE prefilter.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

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

READ ALL DIRECTIONS COMPLETELY BEFORE USE.

Avoid contamination of food or feedstuffs.

Remove pets and birds and cover fish aquariums before spraying.

In Hospitals: Patients should be removed from room prior to treatment. Rooms should be ventilated for two hours after spraying. Do not return patients to room until after ventilation.

<u>GENERAL</u>: This concentrate is designed for use undiluted in mechanical sprayers that gives particles of aerosol size. It can be diluted with refined kerosenes, which meet Food Additive Regulation as defined by CFR Title 21, 172.884, and applied in fogging equipment that give larger than aerosol particle size. It can also be diluted with the oil specified above and applied as a contact spray to kill crawling insects shown later on this label.

Do not apply directly to food. Do not apply space spray while food processing is underway. Cover or remove all food processing surfaces. Thoroughly wash all food processing surfaces before reuse. After spraying in bakeries, meat packing plants, food processing plants, etc., all benches, shelving, equipment, etc. where food will be handled must be washed with an effective cleaning compound followed by a potable water rinse prior to use.

INDOOR AREAS for use in and around, but not limited to [such as]:

Animal Areas & Quarters, Animal Shelters, Animal Control Centers, Apartments. Arcades, Attics, Auditoriums, Bakeries, Beverage Plants, Bars, Basements, Bathrooms, Boats, Bottling Plants, Breweries, Brewery Warehouses, Buildings, Buses, Cabins, Cabinets, Cafeterias, Campers, Canneries, Churches, City Missions, Circus Tents, Closets, Club House, Commercial Buildings, Communication Centers, Condominiums, Concession Stands, Court Houses, Crawl Spaces, Crematoriums, Day Care Centers, Delicatessens, Department Stores, Diners, Dog Houses, Drug Stores, Dumpsters, Dwellings, Egg Processing Plants, Factories, Freight Containers, Fruit Packing Sheds, Funeral Parlors, Garbage Bins, Garbage Cans, Garbage Compactors, Garbage Trucks, Gas Stations, Grain Elevators, Grain Harvesting & Handling Equipment, Garages, Grain Mills, Granaries, Grocery Stores, Homes, Horse Stables & Barns, Horse Trailers, Hospices, Hospitals, Hotels, Indoor Eating Establishments, Industrial Installations, Institutional Dining Areas, Institutions, Jails. Kennels, Laboratories, Laundromats, Lavatories, Libraries, Liquor Stores, Locker Rooms, Marinas, Mausoleums, Meat Packing Plants, Mess Halls, Mini-Storages Mobile Canteens, Mobile Homes, Morgues, Mortuaries, Motels, Movie Theaters, Museums, Nursing Homes, Office Buildings, Other Public Buildings, Parking Garages, Pool Halls, Prisons, Public Storage, Railroad Cars, Recreational Vehicles. Research Animal Quarters, Restaurants, Retail Stores, Rice Mills, Schools, Ships, Ship Holds, Smoke Shops, Sports Stadiums, Stables, Storage Bins (areas), Storage Food in Multi-walled Paper or Cloth Bags, Stores, Supermarkets, Taverns, Textile Mills & Warehouses, Theaters, Tobacco Factories, Tobacco Warehouses, Tool Sheds, Trains, Transportation Equipment, Trucks, Truck Trailers, Tunnels, Utilities, Utility Rooms, False Ceilings, Vending Machines, Veterinary Hospitals, Wall & Equipment Voids, Warehouses, Washrooms, Wholesale Stores, Wine Cellars, Wineries and Zoos.

FOR THE CONTROL OF INSECTS including, but not limited to (such as):

Almond Moths, Angoumois Grain Moths, Ants, Black Fly, Boxelder Bugs, Brown Dog Ticks, Cadelles, Carpet Beetles, Cereal Beetles, Cheese Mites, Cheese Skippers, Chocolate Moths, Cigarette Beetles, Clothes Moths, Clover Mites, Cockroaches, Coffee Bean Weevils, Confused Flour Beetles, Crickets, Dark Mealworms, Darkling Beetles, Deer Flies, Dermestid Beetles, Dried Fruit Beetle, Drugstore Beetles, Earwigs, Face Fly, Firebrat, Flat Grain Beetles, Fleas, Flies, Fruit Flies, Gnats, Grain Mites, Granary Weevils, Horn Flies, Hornets, Horseflies, Indian Meal Moths, Khapra Beetles, Lesser Grain Borers, Lesser House Fly, Mediterranean Flour Moths, Merchant Grain Beetle, Midges, Miller Moths, Millipedes, Mosquitoes, Flying Moths, Palmetto Bugs, Pillbugs, Red Flour Beetles, Rice Flour Beetles, Rusty Grain Beetles, Saw-toothed Grain Beetle, Silverfish, Skipper Fly, Spiders, Spider Beetles, Stable Flies, Sowbugs, Ticks, Ticks that may carry and transit Lyme Disease, Tobacco Moths, Warehouse Beetles, Wasps, Waterbugs, Yellow Mealworms.

INDOOR USE - UNDILUTED

FOR USE IN HOMES, RESTAURANTS, FOOD PROCESSING PLANTS AND OTHER INDUSTRIAL AREAS:

ULV AND SPACE SPRAY: Use in aerosol generators to kill exposed accessible stages of: Flies (including Fruit Flies), Mosquitoes, Small Flying Moths, Fleas, Gnats, Wasps, Hornets, Clover Mites, Cheese Mites, Cheese Skippers, Boxelder Bugs, Earwigs, Ants and the following common Stored Product Pests: Granary Weevils, Rice Weevils, Confused Flour Beetles, Saw-Toothed Grain Beetles, Spider Beetles, Cigarette Beetles, Drugstore Beetles, Angournois Grain Moths, Mediterranean Flour Moths, Indian Meal Moths, Tobacco Moths, Yellow Meal Worms, Dark Meal Worms, Grain Mites, Cadelles and Red Flour Beetles: Remove or cover exposed food and food handling surfaces. Close room and shut off all air conditioning or ventilating equipment. Apply at the rate of 1/2 fluid ounce undiluted concentrate per 1,000 cubic feet of space. Direct spray toward upper corners of room and ceiling. Leave room closed for 1/2 hour and ventilate thoroughly before re-entry.

CONTACT AND SPACE SPRAY: To kill Cockroaches, Silverfish, Earwigs, Ants, Spiders, use a mechanical aerosol generator or a forger. Direct the spray first into all cracks and crevices. hehind all equipment, cupboards, obstructions or dark harborage areas, walls, floors, underneath sinks, behind pipes and in all places that harbor insects to provide maximum penetration and impingement on the insects. Contact as many insects as possible. Do not allow spray to contact stored food. Then treat as a space spray. Apply at the rate of up to 3 fluid ounces per 1,000 cubic feet of space. Vacate treated area and leave the room closed for 1/2 hour. Ventilate thoroughly before re-entry.

NOTE: If there is a need to treat such areas as conduits, motor housings, junction and switch boxes or other electrical equipment, turn off electrical equipment prior to application. After application, allow time for oil to dissipate before starting motors or placing switches in the "ON" position.

TREATMENT OF STORED FOOD AREAS: Foods in multi-walled bags, cloth bags or other packaging stored in such areas as listed areas for the control of accessible adult stages of, but not limited to, Almond Moths, Angournois Grain Moths, Ants, Cadelles, Cereal Beetles, Cheese Mites, Cheese Skippers, Chocolate Moths, Cigarette Beetles, Cockroaches, Confused Flour Beetles, Crickets, Dark Mealworms, Drugstore Beetles, Earwigs, Firebrats, Flies, Fruit Flies, Fungus Gnats, Grain Mites, Granary Weevils, Hide Beetles, Indian Meal Moths, Mediterranean Flour Moths, Mosquitoes, Red Flour Beetles, Rice Weevils, Saw-toothed Grain Beetles, Silverfish, Small Flying Moths, Spiders, Spider Beetles, Yellow Mealworms, Dried Fruit Beetles, Warehouse Beetles, Rusty Grain Beetles, Lesser Grain Beetles, Coffee Bean Weevils, Khapra Beetle and other listed pests. Infested stored products should be destroyed, furnigated or treated by other effective methods using an approved product intended for this purpose. As noted above, disperse first by directing spray into cracks and crevices, corners, pallets and around stacks of packaged goods hitting as many insects as possible and then apply as a space spray at a dosage of 1.5 ounces per 1,000 cubic feet of room space. Do not remain in treated area and ventilate before re-entry.

ON PEANUTS, NUTS, BEANS, (INCLUDING COCOA), SEEDS AND COPRA IN BAGS OR OTHER PACKAGING: For the control of accessible stages of, Almond Moths, Angoumois Grain Moths, Ants, Cadelles, Cereal Beetles, Cheese Mites, Cheese Skippers, Chocolate Moths, Cigarette Beetles, Cockroaches, Confused Flour Beetles, Crickets, Dark Mealworms, Drugstore Beetles, Earwigs, Firebrats, Flies, Fruit Flies, Fungus Gnats, Grain Mites, Granary Weevils, Hide Beetles, Indian Meal Moths, Mediterranean Flour Moths, Mosquitoes, Red Flour Beetles, Rice Weevils, Saw-toothed Grain Beetles, Silverfish, Small Flying Moths, Spiders, Spider Beetles, Yellow Mealworms, Dried Fruit Beetles, Warehouse Beetles, Rusty Grain Beetles, Lesser Grain Beetles, Coffee Bean Weevils, Knapra Beetles and other listed insects, apply to the surface of stored or bagged products. Also spray walls, floors and other surfaces. storage and handling areas thoroughly, being especially careful to treat cracks, crevices and similar hiding places. Then apply as a space spray at the rate of 1.5 ounce per 1,000 cubic feet of space by directing the spray toward the ceiling and upper corners of the area and behind any obstructions.

Contact and Space Spray - Undiluted - To Kill Cockroaches: Using an appropriate ULV spraying device, inject the aerosol spray directly into cracks and crevices to completely fill wall, equipment, and other small structural void areas. Leave room ventilation or air conditioning equipment on during application. Except in hospitals, as noted above, the room can be reentered immediately after applications are complete.

INDOOR USE - DILUTED

SPACE SPRAY: For use in mechanical fogging, thermal fogging or spraying equipment to control accessible stages of Almond Moths, Angoumois Grain Moths, Ants, Cadelles, Cereal Beetles, Cheese Mites, Cheese Skippers, Chocolate Moths, Cigarette Beetles, Cockroaches, Confused Flour Beetles, Crickets, Dark Mealworms, Drugstore Beetles, Earwigs, Firebrats, Flies. Fruit Flies. Fungus Gnats, Grain Mites, Granary Weevils, Hide Beetles, Indian Meal Moths, Mediterranean Flour Moths, Mosquitoes, Red Flour Beetles, Rice Weevils, Saw-toothed

Grain Beetles, Silverfish, Small Flying Moths, Spiders, Spider Beetles, Yellow Mealworms, Dried Fruit Beetles, Warehouse Beetles, Rusty Grain Beetles, Lesser Grain Beetles, Coffee Bean Weevils and Khapra Beetles. Remove or cover exposed food and cover food-handling surfaces in edible product areas of food handling establishments. Close room and shut off all air conditioning or ventilating equipment. Dilute concentrate with a white mineral oil conforming to Regulation 21 CFR 121,2589(b) or an odorless light petroleum hydrocarbon conforming to 121.1182 at the rate of 1 part concentrate to 9 parts oil and mix well. Apply at the rate of 5.0 fluid ounces per 1,000 cubic feet of space, filling the room with mist. Vacate treated area and ventilate before re-entry.

SURFACE SPRAY: To control accessible stages of: Ants, Drugstore Beetles, Earwigs, Cockroaches, Silverfish, Beetles, Boxelder Bugs, Clover Mites, Crickets and other listed insects. dilute 1 part concentrate plus 9 parts suitable diluent, mix well and apply as a coarse wetting spray using approximately 1 gallon of spray mixture per 1,000 square feet of surface. To ensure maximum control of listed crawling insects, spray thoroughly into all cracks, molding, crevices, walls, floors and other surfaces, storage and handling areas. Particular attention should be paid to areas where moisture collects such as drains, sinks and water pipes, around the base of heavy machinery and equipment contacting as many insects as possible. ANTS: Spray directly into nests, along trails, and directly on all ants observed.

FOR USE IN TRANSIT PROTECTION: To control accessible stages of listed insects, clean and spray truck beds, boxcars, ships holds and other listed transit equipment before loading. Thoroughly treat walls and floors. Spray each layer of cartons or containers lightly as stacked. Apply diluted spray at the rate of 1 gallon per 1,000 square feet. To control INDIAN MEAL WORMS, and ANGOUMOIS GRAIN MOTHS in stored grain, apply to the surface of binned grain at a rate of 1 gallon per 1,000 square feet. Apply at monthly intervals with the first appearance of moths and continuing until early fall. In case of severe infestation, break up webbing before spraying and make a second application in two weeks.

Contact Spray - Diluted for use with sprayers that give large, wetting spray particles to kill Cockroaches and Accessible Stages of Granary Insects: Cadelles, Confused Flour Beetles, Grain Mites, Granary Weevils, Meal Moth Larvae and Adults, Red Flour Beetles, Rice Weevils and Saw-Toothed Grain Beetles: Cover or remove exposed food and close room as described above. Dilute Concentrate with oil at the rate of 1 part Concentrate plus 9 parts of oil or \$\frac{15}{2}\$ ounces per gallon and mix well. Spray outside walls of grain bins, flooring, about base of milling machinery, walls and baseboards, areas behind cabinets, around pipes and other insect harborages using 1 gallon spray per1,000 square feet of space. Force spray into all cracks and crevices.

DRIED FRUIT PRODUCTS in storage or being processed, for control of CONFUSED FLOUR BEETLES, DRIED FRUIT BEETLES, INDIAN MEAL MOTHS, AND SAW-TOOTHED GRAIN BEETLES: Remove and destroy infested products. Dilute concentrate with oil at the rate of 1 part concentrate plus 9 parts oil or 15 ounces per gallon and mix well. Disperse this product as a fine mist in the air above the trays and shelves. Do not apply to fruit directly. Use one ounce per 1,000 cubic feet of space. Repeat application at this dosage in any given month. Leave the room closed for one hour. Do not remain in treated areas and ventilate the area before re-entry. Sweep up and destroy fallen insects.

STORED FOOD: (Stored in multi-wall bags or cloth bags) in flour mills, grain elevators, granaries, storage rooms, warehouses for control of ANGOUMOIS GRAIN MOTHS. CADELLES, CHEESE MITES, CHEESE SKIPPERS, CIGARETTE BEETLES, CONFUSED FLOUR BEETLES, DARK MEAL WORMS, GRAIN MITES, GRANARY WEEVILS, INDIAN MEAL MOTHS, MEDITERRANEAN FLOUR MOTHS, RED FLOUR BEETLES, RICE WEEVILS. SAW-TOOTHED GRAIN BEETLES, YELLOW MEAL WORMS: Remove and destroy infested products. Dilute concentrate with oil at the rate of 1 part concentrate plus 9 parts oil or ounces per gallon and mix well. Disperse this product first by directing spray into comers, under pallets, and around stacks of packaged foods hitting as many insects accessible and then treat as a space spray. Infested stored products should be furnigated or treated by other effective methods using an approved product intended for this purpose. Use a dosage of one fluid ounce
Page 3 of 4

per 1,000 cubic feet of space. Do not remain in treated areas and ventilate area before re-entry. This application will kill accessible, exposed stages of those stored product pests listed above. Sweep up and destroy fallen insects.

Zoos: As a space spray diluted for use in conventional mechanical fogging equipment to kill FLIES, GNATS, MOSQUITOES, SMALL FLYING MOTHS: dilute 1 part concentrate plus 9 parts oil (refined kerosene) and mix well. Apply at a rate of 2 fluid ounces per 1,000 cubic feet of space above the animals. Direct spray towards upper portions of the enclosure, filling the room with mist. Keep area closed for at least 15 minutes. Vacate treated area and ventilate before reoccupying. Repeat treatment when reinfestation occurs.

FOR USE IN FEDERALLY INSPECTED MEAT AND POULTRY PLANTS: Apply undiluted with a ULV spraying device up to 3 fluid ounces per 1,000 cubic feet of space. Apply this spray into all cracks and crevices in woodwork, walls, floors, underneath sinks, behind pipes and in all places where these insects shelter. Contact as many insects as possible. Repeat as necessary for control of exposed or accessible stages of ANTS, EARWIGS, FLIES, FRUIT FLIES, GNATS, MOSQUITOES, SILVERFISH, SMALL FLYING MOTHS, SPIDERS, AND WATERBUGS. Before spraying, exposed food products and packaging materials must be covered or removed. After spraying, equipment and utensils must be washed with an effective

cleaning compound and rinsed with potable water prior to use. Use as a space spray only when plant is not in operation.

NOTE: When using oil as the diluent, an odorless light petroleum hydrocarbon as defined by CFR Title 21, \$172,884 should be used for all food area and food related applications. Additionally, when diluted and used according to label directions, this spray will meet specifications for use under USDA meat, poultry, shell egg grading, and egg products inspection programs.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry place. Keep container closed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other approved State and Local procedures.

McLAUGHLIN GORMLEY KING COMPANY

8810 Tenth Avenue North • Minneapolis, MN 55427-4319 U.S.A. 763-544-0341 • 800-645-6466 • Fax 763-544-6437 • www.mgk.com

November 11, 2004

Document Processing Desk (NOTIF)
Office of Pesticide Programs (H7504C)
U.S. Environmental Protection Agency
Aerial Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460-0001

Subject:

Notification per PR Notice 98-10

PYROCIDE® Fogging Concentrate 7338

EPA Reg. No. 1021-1424

Dear Sir/Madam:

Please find enclosed a Notification per PR Notice 98-10, wherein we have corrected some typographical errors. We are enclosing two copies of the label with these corrections highlighted.

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 U.S.C. Sec. 1001 to willfully make any false statement 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.

If you have any questions or need further information, please feel free to give us a call.

Sincerely,

Julie B. Schlekau

Registration Specialist

Aulu & Schlekan

Enclosures