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31 OCT 1996

Ms. Sharon M. Johnston
 AgrEvo Environmental Health
 95 Chestnut Ridge Road
 Montvale NJ 07645

Dear Ms. Johnston:

Subject: 8 Month Response to Silicon Dioxide/Silica Gel
 Reregistration Eligibility Document (RED)
 Drione Insecticide
 EPA Registration Number 4816-353
 Your Letters Dated February 22, 1994 and
 January 4, 1996

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or FIFRA sec. 4 when the Agency requires all registrants of similar products to submit such data.

2. The acute inhalation, primary dermal irritation and dermal sensitization studies were acceptable and assigned Toxicity Categories IV, IV and non sensitizer, respectively. A copy of the precautionary labeling review is enclosed for your reference. Based on the acute toxicity profile of the subject product, please make the following changes to the labeling:

a. Add the following Note to Physician to the labeling:

Note to Physician: May pose an aspiration pneumonia hazard.

b. The statement "Contains petroleum distillates" should appear in close proximity to the ingredients statement.

3. Revise the last sentence in the Environmental Hazards to read "Do not contaminate water when disposing of equipment washwater or rinsate."

4. Submit two copies of your final printed labeling before

you release the product for CONGRUENCE. Refer to the A-79

SYMBOL	Enclosure for a further description of final printed labeling.					
SURNAME						
DATE						

294

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager 13
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

324

**DRIONE®
INSECTICIDE**

- * For Industrial/Commercial Use Only
- * A Desiccant Dust
- * Provides Quick Control
- * Kills Up To 6 Months When Left Undisturbed
- * Non-Staining And Relatively Odorless
- * For Use In Residences, Institutions, Food Plants, Granaries And On Cats And Dogs
- * Controls Ants, Cockroaches, Silverfish, Bedbugs, Fleas, Lice, Bees And As Stipulated In The Use Directions, On Numerous Stored Product Pests And To Protect Against Entrance Of Drywood Termites

ACTIVE INGREDIENTS:

Pyrethrins.....	1.00%
* Piperonyl Butoxide, Technical.....	10.00%
Amorphous Silica Gel	40.00%

INERT INGREDIENTS:49.00%
100.00%

*Equivalent to 8.0% (butyl carbityl) (6-propylpiperonyl) ether and 2.0% related compounds

Drione is a registered trademark of AgrEvo Environmental Health, Inc.

EPA Reg. No. 4816-353

EPA Est. No.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

STATEMENT OF PRACTICAL TREATMENT

If On Skin: Wash with plenty of soap and water. Get medical attention.

If In Eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

See Side Panel for Additional Precautions

AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

NET CONTENTS:
ACCEPTED
with COMMENTS
in EPA Letter Dated

31 OCT 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

4816-353

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC
ANIMALS
CAUTION**

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Containers larger than one pound may not be used or stored in food handling establishments.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

DIRECTIONS FOR USE

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

Applications Within Food Areas: For use in and around food processing plants and warehouses, bakeries, beverage plants, restaurants, supermarkets, meat and poultry processing plants, hotels, motels, hospitals and schools.

Limit To Crack And Crevice Treatment Only: Using a bulbous duster, apply a small amount of material directly into cracks and crevices such as expansion joints between different elements of construction or between equipment bases and the floor, wall voids, motor housings, junction boxes or switch boxes, conduits or hollow equipment legs where Cockroaches, Ants, Silverfish, Spiders, Boxelder Bugs and Crickets hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

Applications of This Product in the Food Areas of Food Handling Establishments Other Than as a Crack and Crevice Treatment are Not Permitted.

Non-Food Areas: For use in and around homes, institutions, hospitals, office buildings, hotels, motels, theaters, schools, warehouses, truck trailers and railroad cars. To control crawling insects such as Ants, Cockroaches, Silverfish, Firebrats, Spiders, Boxelder Bugs, Ticks, Lice and Fleas in animal quarters, distribute Drione at the rate of 2 ounces per 100 square feet of surface area. Apply a continuous visible film underneath and behind stairs, refrigerators and appliances. Treat on, around and behind moldings, shelving, baseboards, pipe openings, cracks, crevices

and other areas where insects hide. For severe infestations, apply Drione behind cabinets and walls, in crawl spaces and attics at the rate of 16 ounces per 1000 square feet of surface area. Repeat treatment as necessary.

Stored Product Pests: To aid in the control of Cadelles, Cheese Mites, Cigarette Beetles, Confused Flour Beetles, Dark Meal Worms, Drugstore Beetles, Grain Mites, Granary Weevils, Red Flour Beetles, Rice Weevils, Saw-toothed Grain Beetles and Yellow Meal Worms in Mills, Elevators and Granaries. Clean up waste materials, dust, dirt and any other debris. Thoroughly treat floors, walls and other surfaces in bins, storage and handling areas. Apply into cracks and crevices and other difficult to reach areas where insects may hide.

Bees and Wasps: It is generally advisable to treat wasp and bee nests in the evening when insects are less active and have returned to the nest. Using hand or power duster or other suitable means, with extension tubes if necessary, thoroughly dust nest and entrance and surrounding areas where insects alight. Nests in wall voids can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in, and reseal. For best results, check nests carefully one or two days after treatment to ensure complete kill, then remove and destroy nest to prevent emergence of newly-hatched insects. If removal is not feasible, retreat the nest, if necessary. Care should be taken when treating overhead nests so that neither the product nor the nest falls on people standing below.

Sewer Treatments: American and Oriental Cockroach infestations in sanitary sewers may be treated with approximately 6 ounces of Drione per manhole. When treating sewers, one manhole per 200 feet of line should be treated. Treatments are made by removing the manhole cover and replacing with a disc of plywood bored to receive the usual flexible hose from portable or truck-mounted ventilating equipment. 6 ounces of Drione is introduced into the ventilating air to be dispersed quickly and thoroughly through the system.

Bedbugs: Take bed apart. Dust into joints and channels. If hollow, such as square or round tubing, see that the interior of framework is well dusted. Mattresses should be dusted, especially tufts, folds, and edges. Picture frame moldings and all cracks and crevices in the room should be treated.

Drywood Termites: To protect against entrance, using an electric or hand operated rotary duster, distribute Drione through an entry, e.g. crawl hole into attic and crawl space of building, at a rate of 1 pound per 1000

square feet of floor area. All vents and blowers on the windward side should be closed. All wood surfaces should be covered. In case of localized infestations, probe to locate galleries and drill holes to inject Drione into the galleries. If a reasonably heavy infestation has already developed, fumigation should be employed.

Fleas: Dogs and Cats - Liberally apply powder to the animal, rubbing thoroughly to the skin. Begin with the neck and include the underbody, legs, feet and the base of the tail. Repeat as necessary. Surfaces of kennels should be dusted at the rate of one ounce per 50 square feet. Heavily infested lawns, basements, and crawl spaces should be dusted at the rate of 16 ounces per 1000 square feet. Repeat as necessary.

Sow Bugs, Pillbugs, Ground Beetles, Earwigs, Millipedes, Centipedes and Scorpions: Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

STORAGE & DISPOSAL

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

Pesticide Storage and Spill Procedures: Store upright at room temperature. Keep away from moisture. In case of spill or leakage, sweep up and dispose of with chemical waste.

Pesticide Disposal: Pesticide or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

CONTAINERS ONE POUND AND SMALLER:

Storage: Store in original sealed container in a cool, dry place inaccessible to children and pets.

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

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.