

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 21 2001

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Jon Wood Amvac 4695 MacArthur Court Suite 1250 Newport Beach, CA 92660

Subject:

Label Amendment ALCO No-Pest Strip EPA Reg. No. 5481-338 AMVAC Insect Strip EPA Reg. No. 5481-344

Your Submission Dated August 24, 2001

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.

1. Amend information provided under DISPOSAL to comply with PR Notice 2001-6. Include the following information: "IF EMPTY: Do not reuse this container. Place in trash or offer for recycling if available. IF PARTIALLY FILLED: Call your local solid waste agency or [toll free number which meets criteria in paragraph II.E] or disposal instruction. Never place product down any indoor or outdoor drain".

As you know, DDVP is currently undergoing special review and reregistration by the Agency under the Food Quality Protection Act of 1996. Since the proposed amendment imposes additional restrictions that may reduce exposure beyond current labels, the Agency is accepting these changes at this time. Additional changes may be required as a result of the on-going reregistration and tolerance reassessment process.

If you require any further correspondence on this matter, please contact Linda Werrell Gerber (703-308-8033) of my staff.

Sincerely

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

Enclosure

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AMVAC INSECT STRIP

Kills Flying and Crawling Insect Pests as Listed.
Long-Lasting, 'Round-the-Clock' Protection.
Solid Strip* Formula Kills Flies, Moths, Mosquitoes, Gnats,
Cockroaches, Silverfish, Spiders and Other Insects as Listed.

For use in Specified Areas within Homes, Ranches, Farms and Cabins, Garages, Attics, Crawl Spaces, Storage Areas and Boathouses, Museums, Garbage Cans, Trash Dumpsters, Animal Buildings, Milk Rooms, Catch Basins, Bulk Raw Grain, Storage Bins

HOUSEHOLD USES

"A Clothes Moth Killer" - "Use as a Moth Killer"
"A Small Space Insect Killer" - "Use in Small Spaces"
" A Fly Killer" - "Use as a Fly Killer"

(An alternate wording label format is as follows) Small Space Bug Killer ◆ Moth Killer ◆ Kills Flying and Crawling Insect Pests as listed ◆ Long-Lasting, Round-the-Clock Protection ◆ Convenient, Ready to Use ◆ Simply remove from package to begin controlling action ◆ Solid Unit Formula Kills Flies, Moths, Cockroaches, Silverfish, Spiders, and Other Insects as listed ◆ Use in specified areas within Homes, Ranches, Farms and Cabins and Garages ◆ Garbage Cans and Storage Bins ◆ Unscented - No Unpleasant Odor ◆ Leaves No Odor ◆ Kills Moths ◆ A Clothes Moth Killer ◆ Use as a Moth Killer ◆ A Small Space Insect Killer ◆ Use in Small Spaces ◆ One Unit (10.5g) will treat up to 100 cubic feet ◆ One Unit (10.5g) treats up to 100 cubic feet. ◆ One Unit (5.25g) will treat up to 50 cubic feet ◆ One Unit (5.25g) treats up to 50 cu. ft.

ACTIVE INGREDIENTS:

Dichlorvos (2,2-dichlorovinyl dimethyl phospha	ate)18.6%
Related Compounds	
INERT INGREDIENTS:	
Total	

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for Additional Precautions

EPA Reg. No. 5481-344

EPA Est. No. 68643-GBR-001

Net Weight: 65 grams (2.29 oz.)

Five Additional Sizes Available - See Chart for Space Treated with Each Size 5.25 grams (0.9 oz.) 10.5 grams (0.37 oz.) 21 grams (0.74 oz.) 80 grams (2.82 oz.) 100 grams (3.53 oz.)

AMVAC Chemical Corporation

4100 East Washington Blvd., Los Angeles, CA 90023, USA

with COMMENTS In EPA Letter Dated: NOV 2 | 2001

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

344-010815r4.doc Fungicide, and I sa smended, for registered under

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION: Do not get in mouth. Harmful if swallowed. After prolonged storage, a small amount of liquid may form on strip. Do not get liquid in eyes. Wash hands thoroughly with soap and water after handling strip. Do not use in hospitals or clinic rooms such as patient rooms, wards, nurseries, operating or emergency areas. Do not use in any rooms or closets of rooms where infants, children and the sick or aged are or will be present for any extended period of confinement. Do not use in kitchens (except cupboards), restaurants or areas where food is prepared or served. Do not use in any area of the home where people will be present for extended periods of time. Not to be taken internally by humans or animals.

FIRST AID		
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 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 eye. Call a poison control center or doctor for treatment advice. 	
If swallowed:	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. 	
Have product of treatment.	ontainer or label with you when calling a poison control center or doctor, or going for	

STOP! READ ENTIRE LABEL BEFORE USE

DIRECTIONS FOR USE

(Alternate wording in italics) It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Remove pre-assembled AMVAC INSECT STRIP from sealed bag when ready to use. Place (Hang) in desired location away from windows and out of reach of children and pets. (To apply units to vertical surfaces, use the enclosed stickers). Drafts, weather and other conditions may affect the performance, but treatment usually lasts for four (4) months. (One ____g unit will treat _____cu. ft.). Record the date of installation and replace with a new, fresh, full-strength strip at the end of four (4) months or when effectiveness diminishes. Do not use in the food/feed processing or food/feed manufacturing or food/feed service establishments. Non-food/feed areas of these establishments where the product can be used are areas such as garbage rooms, lavatories, floor drains (to sewer) entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, utility equipment, garages, mop closets, and product storage (after canning or bottling). The AMVAC INSECT STRIP controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, and earwigs and other insects as listed.

HOUSEHOLD, INDUSTRIAL, AND COMMERCIAL USES

DO NOT USE IN AREAS OF A HOME WHERE PEOPLE WILL BE PRESENT FOR AN EXTENDED PERIOD OF TIME (e.g. Living Room, Family Room)

Homes, Ranches, Farms, Cabins, Garages, Storage Units, Attics, Crawl Spaces, Boathouses

Controls flies, mosquitoes, gnats and other insects as listed.

Garbage Cans, Trash Dumpsters

For control of flies in garbage cans and dumpsters, attach appropriate sized strip (10.5-gram strip treats 50 to 100 cu. ft.) inside can or dumpster. Keep lid on can and dumpster closed.

Animal Buildings

Controls flies, mosquitoes and gnats in horse barns, calf parlors, hog parlors, stables, poultry houses, tack rooms and dog kennels. Do not contaminate food, water or foodstuffs. DO NOT contaminate milk or milking equipment.

Milk Rooms

Controls flies, mosquitoes and gnats in milk rooms and bulk storage rooms. DO NOT contaminate milk or milking equipment.

Assembly instructions for Non-Assembled Strip Gently squeeze edges of holder to open ends of unit. Press in bottom locking tabs to prevent strip from sliding out of holder. Without damaging the strip inside carefully cut open the envelope with scissors. Slide par into the holder at the top. Press in top SACI To hang, attach through hole of

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Agricultural Commodities

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Bulk storage of raw grains, corn, soybeans, cocoa beans and peanuts. For control of Almond Moths, Cocoa Moths, Indian Meal Moths, and Mediterranean Flour Moths infesting non-perishable bulk-stored raw agricultural commodities. Calculate cubic feet of air space above the commodity to determine the number of 80-gram strips required for treatment. Treat in early Spring before moths begin to emerge. Replace strip when needed to prevent egg laying by moths.

Catch Basins

To control mosquitoes breeding in catch basin, suspend one 80-gram strip about ten inches above water level. Usual control lasts 10 to 15 weeks.

Utility

To control Fire Ants, Wasps and other insects as listed which commonly infest utility enclosures, cabinet conduits and junction boxes. Remove from sealed bag and hang or stand so air can contact all sides of the strip. Use a size appropriate for the space being treated: one (1) 5.25-gram strip per 25 to 50 cu. ft. or one (1) 10.5-gram strip per 50 to 100 cu. ft. or one (1) 21-gram strip to treat 100 to 200 cu. ft. of enclosed space for utility equipment such as communications equipment, electric, gas, water and cable television. Record installation date and replace when effectiveness diminishes.

Reptile Houses and Terrariums

(Alternate wording in italics) For control of mites on reptiles. In Reptile Houses: Hang appropriate number of (80) 65-gram strips per 1,000 cu. ft. for the space to be treated. Do not over treat. In Terrariums: Cover the top of an open terrarium having a minimum size of 10 cubic feet with a wire screen and place a caged 10.5 or 21-gram strip on the screen for 48 hours. Make sure that the reptiles can not touch or contact the strip.

How much space will one strip treat?

Strip Size	Treats	Approx. Equivalent to Area Measuring
5.25 grams	05.4-50 5	4'x3'x2' = 24 cu. ft.
	25 to 50 cu. ft.	8'x3'x2' = 48 cu. ft.
10.5 grams	50 to 100 cu. ft.	8'x6'x2' = 96 cu. ft.
21 grams	100 to 200 cu. ft.	8'x8'x3' = 192 cu. ft.
65 grams	900 to 1,200 cu. ft.	8'x10'x11' = 880 cu. ft.
80 grams	900 to 1,200 cu. ft.	8'x10'x15' = 1200 cu. ft.
100 grams	1,000 to 1,500 cu. ft.	8'x12'x15' = 1440 cu. ft.

Always use the appropriate size and number of strips for the space being treated. If more than one is required, distribute them over the space equally.

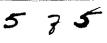
HOUSEHOLD USES

Use only in Closets, Wardrobes, Cupboards and Storage Spaces

DO NOT USE IN AREAS OF A HOME WHERE PEOPLE WILL BE PRESENT FOR AN EXTENDED PERIOD OF TIME (e.g. Living Room, Family Room)

(Alternate wording in italics) Gives continuous protection against moths, silverfish, cockroaches and other insects as listed in closets, wardrobes and storage spaces for up to four (4) months and leaves no smell (odor). Remove strip from sealed bag and hang or stand on wardrobe or closet rail, ensuring that strip does not contact clothes or fabrics and that air can circulate around the strip. (One ____ gram strip will treat a space of ____ to ___ cubic feet). One 5.25-gram strip will treat a space of 25 to 50 cu. ft. One 10.5-gram strip will treat a space of 50 to 100 cu. ft. Use two 10.5 g units to treat a space of 100 to 200 cubic feet or one 21-gram strip to treat 100 to 200 cu. ft. for up to four (4) months. If more than one is required, distribute them over the space equally. Keep the space closed. Record the date of installation so that the old strip may be replaced with a new, fresh, full-strength strip at the end of the four-month period or when effectiveness diminishes.

Do not use more than the number of strips recommended for the space to be treated. Do not use in any rooms or closets of rooms where infants, children and the sick or aged are or will be present for any extended period of confinement. Do not use where unwrapped food is stored or allow the strip to come into contact with food or cooking utensils. Do not allow children or pets to play or sleep in these areas when treatment is in progress.



Attics, Garages, Sheds, Basements and Enclosed Crawl Spaces DO NOT USE IN AREAS OF A HOME WHERE PEOPLE WILL BE PRESENT FOR AN EXTENDED PERIOD OF TIME

(Alternate wording in italics) Kills flies and other insects as listed for up to four (4) months. Remove from sealed bag and hang or stand, out of reach of children and pets, in an open space of an enclosed area, away from windows. One (80) 65-gram strip will treat 900 to 1200 cubic feet which is about equal to an average room 10 x 13 with an 8-foot ceiling for up to 4 months. In a larger room, if more than one strip is required, keep them at least 10 feet apart. Record the date of installation so that the old strip may be replaced with a new, fresh, full-strength strip at the end of the four-month period or when effectiveness diminishes.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Do not open or remove from package before ready to install. Store in cool, dry place. Do not reuse packaging. Wrap used packaging in several layers of newspaper and discard in trash collection.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conform to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

Additional copy for an alternate non-warranty notice statement as follows:

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

Proposition 65: Warning: This product contains a chemical known to the State of California to cause cancer. [OPTIONAL FOR USE IN CALIFORNIA]

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:		
Transportation: CHEMTREC	1-800-424-9300	
Other: AMVAC	1-323-264-3910	

^{*}Alternate descriptive words that may be used for "strip" on this label are "unit" and/or "bar".

AMVAC Chemical Corporation 4100 E. Washington Boulevard Los Angeles, CA 90023 U.S.A. 1-888-462-6822 www.amvac-chemical.com