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JUN 16 1998

Mr. H. R. McLane
7210 Red Road, Suite 206
Miami, Florida 33143-5321

Dear Mr. McLane:

Subject: Labeling Amendment
ALCO Pest Strip
EPA Registration No. 5481-348
Your Submission Dated August 5, 1997

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling change listed below before you release the product for shipment bearing the amended labeling:

1. The term "moth proofers" must be deleted. Claims which imply total eradication or elimination of pests are not acceptable.
2. Delete "Kills moths with no unpleasant odor". A false or misleading comparison with other pesticides is not acceptable.
3. Under Precautionary Statements replace the last sentence, "Do not use in edible product areas of food processing plants" with, "Do not use in the food/feed processing or food/feed manufacturing areas of food/feed processing and food/feed manufacturing plants. Non-food/feed areas of these plants 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, garages, mop closets, and storage (after canning or bottling).

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,

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

Enclosure



PEST 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.

* (alternate descriptive words that may be used for "strip" on this label are "unit" and/or "bar")

**Use in Homes, Motels, Cabins, Garages, Museums, Garbage Cans,
Trash Dumpsters, Animal buildings, Milkrooms, Catch Basins,
Bulk Raw Grain, Storage Bins.**

Household Uses

"A CLOTHES MOTH KILLER"

Use as a Moth Killer

(AN ALTERNATE WORDING LABEL FORMAT IS AS FOLLOWS) MOTH PROOFER - Kills flying and crawling insect pests as listed - Long Lasting - 'round the clock protection - Solid unit formula kills moths, silverfish, spiders, and other insects as listed - Use in homes, motels, cabins and garages. Unscented - Kills moths with no unpleasant odor - Kills Moths - A clothes moth killer - Use as a moth killer - One unit will treat up to 100 cubic feet - One unit treats up to 100 cu.ft. One unit will treat a closet up to 100 cubic feet.

"A SMALL SPACE INSECT KILLER"

Use in Small Spaces

(AN ALTERNATE WORDING LABEL FORMAT IS AS FOLLOWS) SMALL SPACE BUG KILLER - Kills flying and crawling insect pests as listed - Long Lasting - 'round-the-clock protection - Solid unit formula kills flies, moths, cockroaches, silverfish, spiders, and other insects as listed - Use in homes, cabins, garages, garbage cans and storage bins - Unscented - A small space insect killer - Use in small spaces - One unit will treat up to 50 cubic feet - One unit treats up to 50 cu.ft.

"A FLY KILLER"

Use as a Fly Killer

ACTIVE INGREDIENTS:

Dichlorvos: 2,2 dichlorovinyl dimethyl phosphate - - - 18.6%

Related Compounds: - - - - - 1.4%

INERT INGREDIENTS: - - - - - 80.0%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Additional Precautions

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & 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 where infants, the sick or aged are or will be present for any extended period of confinement. Do not use in kitchens, restaurants, or areas where food is prepared or served. Not to be taken internally by humans or animals. Do not use in edible product areas of food processing plants.

STATEMENT OF PRACTICAL TREATMENT

If On Skin: Remove contaminated clothing and wash affected area with soap and water.

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

EPA Reg. No. 5481-348

EPA Est. No. 68643-GEP-001

Net Weight 80 grams.

Four Additional Sizes Available - See Chart for Space Treated with each size:
100 grams; 21 gms; 10.5 gms;(0.37 oz.); 5.25g(0.185 oz.)

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD.
LOS ANGELES, CALIFORNIA 90023 U.S.A.

ACCEPTED
WITH COMMENTS
in EPA Letter Dated

JUN 16 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered on 05/24/91 and for all
date wording this date 07-31-97.

5481-348



PEST STRIP

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STOP: READ ENTIRE LABEL BEFORE USE**DIRECTIONS FOR USE****Assembly instructions for non-assembled strip**

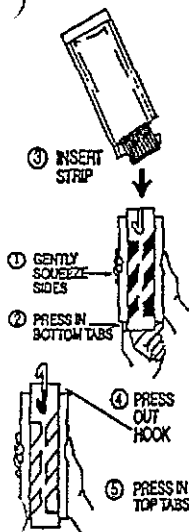
1. Gently squeeze edges of holder to open ends of unit.

2. Press in bottom locking tabs to prevent strip from sliding out of holder.

3. Without damaging the strip inside, carefully cut open the envelope with scissors. Slide bar into the holder at the top.

4. Press in top locking tabs to secure strip inside holder.

5. To hang, attach metal hook through hole of



It is a violation of federal law to use this product in a manner inconsistent with its labeling. Remove pre-assembled ALCO PEST STRIP* (bar) from sealed bag when ready to use. Hang in desired location in away from windows and out of reach of children and pets. Drafts, weather and other conditions may affect the performance, but treatment usually last for (4) **four** months. 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. The ALCO PEST STRIP controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, and earwigs. * (alternate descriptive words that may be used for "strip" on this label are "unit" and/or "bar")

HOUSEHOLD / INDUSTRIAL / COMMERCIAL USES**Homes, Cabins, Garages, Motels**

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 bar (10.5 gram bar 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 milkrooms and bulk storage rooms. DO NOT contaminate milk or milking equipment.

Agricultural Commodities

Bulk Storage of raw grains, corn, soybeans, cocoa beans, and peanuts. For control of Almond Moths, Cocoa Moth, Indian Meal Moth, 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 bars 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 bar about ten inches above water level. Usual control lasts 10 to 15 weeks.

Utility

To control Fire Ants, and Wasps, which commonly infest utility enclosures, cabinets, and junctions. Remove from sealed bag and hang so air can contact all sides of the bar. Use one (1) 10.5 gram bar per 50 to 100 cu.ft., or one 21 gram bar 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 / Terrariums

For control of mites on reptiles: In Reptile Houses: Hang appropriate number of 80 gram bars 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 21 gram bar 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 cubic feet.
5.25 grams	- 25-50 cu.ft.
10.5 grams	- 50-100 cu.ft.
21 grams	- 100-200 cu.ft.
80 gram	- 900-1200 cu.ft.
100 gram	- 1000-1500 cu.ft.

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

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nate wording, this date 07-31-97



PEST STRIP

EPA Reg. No. 5481-348

HOUSEHOLD USES

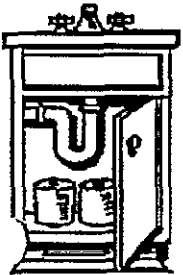
Closets, Wardrobes and Storage Spaces



FOR CLOTHES
MOTHS

Gives continuous protection against moths, silverfish, cockroaches and other insects as listed in closets, wardrobes and storage spaces, for up to (4) **four** months and leaves no smell. Remove strip* from sealed bag and hang on wardrobe or closet rail, ensuring that strip does not contact clothes or fabrics and that air can circulate around the bar*. Keep the space closed. One 10.5 gram bar* will treat a space of 50 to 100 cubic feet. **Use two units to treat a space of 100 to 200 cubic feet** or one 21 gram bar* will treat 100 to 200 cu.ft. for up to (4) **four** months. **If more than one is required, distribute them over the space equally.** 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 (4) **four** month period or when effectiveness diminishes. Do not allow children or pets to sleep in these areas when treatment is in progress.

**(alternate descriptive words that may be used for "strip" on this label are "unit" and/or "bar")*



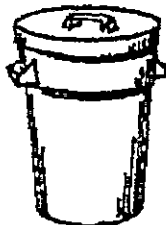
AROUND
PLUMBING

Use as a Small Space Insect Killer

Kills flies and other household insects as listed all summer long. Remove from sealed bag and hang or stand, out of reach of children and pets and away from windows. One 10.5 gram bar* will treat a space of 50 to 100 cubic feet (**alternate wording for a 5.25 gram "unit"**) - **One unit will treat a space 25 to 50 cubic feet.** or one 21 gram bar* will treat 100 to 200 cu.ft. Controls flies, beetles, earwigs, cockroaches, silverfish, mosquitoes, and other small household insects for up to (4) **four** months. Do not use where unwrapped food is stored or allow the strip* to come into contact with food or cooking utensils. 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 4 month period or when effectiveness diminishes.

Use as a Fly Killer

Kills flies and other insects as listed all summer long. Remove from sealed bag and hang or stand, out of reach of children and pets, in an open space, away from windows. One 80 gram bar* will treat 1,000 cubic feet which can be 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 4 month period or when effectiveness diminishes.



GARBAGE &
REFUSE CANS

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.

IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following: **LIMITED WARRANTY:** AMVAC warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness. There are no express warranties other than those set forth herein. Amvac neither makes nor intends, nor does it authorize any agent or representative to make, any other warranty, express or implied. Amvac expressly excludes and disclaims all implied warranties of merchantability, fitness for particular purpose, or any other warranty of quality or performance. This warranty does not extend to, and the user shall be solely responsible for, any loss or damage which results from the use of this product in any manner which is inconsistent with this label's directions, warnings or cautions. User's exclusive remedy and Amvac's or seller's exclusive liability for any claim, loss, damage, or injury 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 Amvac's option, to replacement of, or repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall Amvac or Seller be liable for special, indirect, or consequential damages resulting from the use or handling of this product.

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.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY
TRANSPORTATION: CHEMTREC - - - - - 1-800-424-9300
MEDICAL: HAZARD INFORMATION SERVICES (H.I.S.) 1-800-228-5635 Ext. 169

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