



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 18 2001

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

Subject: Label Amendment
ALCO Pest Strip
EPA Reg. No. 5481-348
Your Submission Dated March 21, 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 FIRST AID STATEMENTS per PR Notice 2001-1, similar to your 08/14/00 submission.
2. Do you intend to amend the labels for EPA Reg. No.'s 5481-338 and 5481-344? If so, please submit this request.

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

A handwritten signature in cursive script, appearing to read "George T. LaRocca".

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

Enclosure

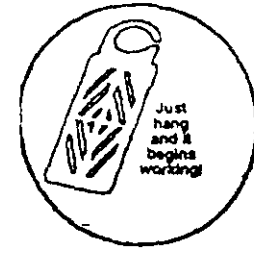


PEST STRIP

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.

Use in Homes and Cabins (Specified Areas), Garages, Boathouses, Garbage Cans, Trash Dumpsters, Animal Buildings, Milk Rooms, Catch Basins, Utility Enclosures, Bulk Raw Grain, Reptile Houses and Terrariums

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 ♦ Solid Unit Formula Kills Flies, Moths, Cockroaches, Silverfish, Spiders, and Other Insects as listed ♦ Use in Homes, 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 (10.5 g) will treat up to 100 cubic feet ♦ One Unit (10.5 g) treats up to 100 cu. ft. ♦ One Unit (10.5 g) will treat a closet up to 100 cubic feet. One Unit (5.25 g) will treat up to 50 cubic feet ♦ One Unit (5.25 g) treats up to 50 cu. ft.

ACTIVE INGREDIENTS:	
Dichlorvos (2,2-dichlorovinyl dimethyl phosphate)	18.6%
OTHER INGREDIENTS:	81.4%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back Panel for Complete Directions and Additional Precautions

EPA Reg. No. 5481-348

EPA Est. No. 68643-GBR-001

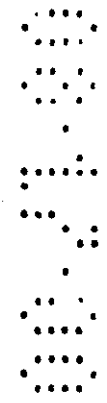
Net Weight: As Marked on Container

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAY 18 2001

Sizes Available	
5.25 grams (0.9 oz.)	65 grams (2.29 oz.)
10.5 grams (0.37 oz.)	80 grams (2.82 oz.)
21 grams (0.74 oz.)	100 grams (3.53 oz.)

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 5481-348

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



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. After prolonged storage, a small amount of liquid may form on strip*. Do not get liquid in eyes. 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 and 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.

FIRST AID

- | | |
|-------------------------|--|
| If on skin or clothing: | <ul style="list-style-type: none"> • 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: | <ul style="list-style-type: none"> • 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: | <ul style="list-style-type: none"> • 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 container or label with you when calling a poison control center or doctor, or going for treatment.

PRODUCT FACTS

What It Does:

Kills Flying and Crawling Insects including: Flies, Gnats, Mosquitoes, Moths, Silverfish, Cockroaches, Spiders, Beetles, Earwigs and Other Listed Insects.

Where To Use:

Homes, Garages, Storage Spaces

Questions & Comments:

Call 1-800-462-6822 or visit our website at www.amvac-chemical.com

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 ALCO PEST 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 the food/feed manufacturing areas of 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, garages, mop closets, and storage (after canning or bottling). The ALCO PEST STRIP controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, and earwigs and other insects as listed.

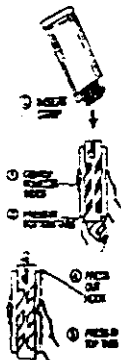
How much space will one strip treat?

Strip Size	Treats Cubic Feet
5.25 grams	25 to 50 cu. ft.
10.5 grams	50 to 100 cu. ft.
21 grams	100 to 200 cu. ft.
65 grams	900 to 1,200 cu. ft.
80 grams	900 to 1,200 cu. ft.
100 grams	1,000 to 1,500 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.

Assembly Instructions for Non-Assembled Strip

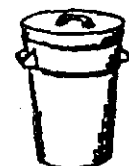
1. Gently squeeze edges of holder to open ends of unit.
2. Press in bottom locking tabs to prevent strip from sliding out of holder.
3. Holding the strip inside, carefully cut open the envelope with scissors. Slide bar into the holder at the top.
4. Press in top locking tabs to secure strip inside holder.
5. To hang, attach metal hook through hold of unit.



FOR CLOTHES MOTHS



AROUND PLUMBING



GARBAGE & REFUSE CANS

HOUSEHOLD, INDUSTRIAL, AND COMMERCIAL USES

4/5

HOMES, CABINS, GARAGES, BOATHOUSES

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

Closets, Wardrobes and Storage Spaces

(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*. Keep the space closed. *(One ___ gram strip* will treat a space of ___ to ___ cubic feet)*. 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* will treat 100 to 200 cu. ft. for up to four (4) months. If more than one is required, distribute them over the space equally. 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 four-month period or when effectiveness diminishes. Do not allow children or pets to sleep in these areas when treatment is in progress.

Attics, Garages, Sheds, Basements and Enclosed Crawl Spaces

(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, 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.

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.

BULK RAW GRAINS

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 ENCLOSURES

To control Fire Ants, Wasps and other insects as listed which commonly infest utility enclosures, cabinets and junctions. Remove from sealed bag and hang or stand so air can contact all sides of the strip. Use 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 21-gram strip on the screen for 48 hours. Make sure that the reptiles can not touch or contact the strip.

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.

GUARANTEED RESULTS: If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.

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: AMVAC1-323-264-3910

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