



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Jon Wood
Amvac
4595 MacArthur Court
Suite 1250
Newport Beach, CA 92660

Subject: Label Amendment
ALCO Pest Strip
EPA Reg. No. 5481-348
Agency Initiated Action

The incorrect labeling was stamped approved with comments in response to your submission dated March 21, 2001. We apologize for the error. The correct, stamped label is enclosed (010124isco01 prop CA label for SFO/2). All other comments associated with the Agency letter dated May 18, 2001 remain in effect.

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



Correct Label

2/5

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.

For Use in Specified Areas within Homes, Ranches, Farms and Cabins, Garages, Attics, Crawl Spaces, Storage Areas and Boat Houses, 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 cu. ft. ♦ One Unit (10.5g) will treat a closet 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 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 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.

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-GBR-001

Net Weight: 65 grams (2.29oz.)

ACCEPTED
with COMMENTS
In EPA 100 grams (3.53 oz) 80 grams (2.82 oz) 21 grams (0.74 oz) 10.5 grams (0.37 oz.) 5.25 grams (0.90z)

JUN -4 2001

AMVAC

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

1000 East Washington Blvd.
Los Angeles, California 90023
EPA Reg. No. 5481-348
EPA Est. No. 68643-GBR-001
Prop. C-Label for SFO/2

STOP! READ ENTIRE LABEL BEFORE USE

3/5

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 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 ALCO PEST STRIP controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, and earwigs and other insects as listed.

Assembly
Instructions for
on-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
bar into the
holder at the
top.
Press in top
locking tabs to
secure strip
inside holder.
To hang, attach
metal hook
through hold of
unit.

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, Crawlspace, 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.

Agricultural Commodities

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, cabinets conduits and junctions 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	25 to 50 cu. ft.	4' x 3' x 2' = 24 cu. ft 8' x 3' x 2' = 48 cu. ft
10.5 grams	50 to 100 cu. ft.	8' x 6' x 2' = 96 cu. ft
21 grams	100 to 200 cu. ft.	8' x 8' x 3' = 192 cu. ft
65 grams	900 to 1,200 cu. ft.	8' x 10' x 11' = 880 cu. ft
80 grams	900 to 1,200 cu. ft.	8' x 10' x 15' = 1200 cu. ft
100 grams	1,000 to 1,500 cu. ft.	8' x 12' x 15' = 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.

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 a 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 to, 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 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.

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

<p align="center">FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:</p> <p>Transportation: CHEMTREC..... 1-800-424-9300</p>
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*Alternate descriptive words that may be used for "strip" on this label are "unit" and/or "bar".