

5481-531

10-11-2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 11 2006

Jon C. Wood
Amvac Chemical Corp.
4695 MacArthur Court, Suite 1250
Newport Beach, CA 92660-1706

Subject: Dichlorvos (DDPV) Label Amendments
ALCO® Small No Pest Strip (EPA Reg. No. 5481-338)
AMVAC® Small Insect Strip (EPA Reg. No. 5481-344)
ALCO® Small Pest Strip (EPA Reg. No. 5481-348)
AMVAC® Large Insect Strip (EPA Reg. No. 5481-532)
AMVAC® Large Pest Strip (EPA Reg. No. 5481-531)
ALCO® Large No Pest Strip (EPA Reg. No. 5481-533)
Your applications submitted October 2, 2006

Dear Mr. Wood:

The amendments referred to above, submitted in connection with registration under Section (3) (c) (7) (a) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable subject to the comments and terms for conditional registration listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the products for shipment. A stamped copy of the label is enclosed for your records.

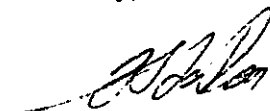
1. You will submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3 (c) (5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. You agree that the subject amendments are conditional under the same terms and conditions as stipulated in the May 9, 2006 letter (Ref. Wintemute to Rossi).

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If you have any questions regarding this action, please contact me at (703) 305-6100.

Sincerely,



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

Enclosure

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LARGE PEST STRIP *

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

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 unoccupied areas; not for use in homes except garages, attics, crawl spaces, and sheds occupied for less than 4 hours per day. Also for use in boathouses, museum collections, animal buildings, and milk rooms, or enclosed areas thereof, occupied for less than 4 hours per day. For use in unoccupied areas such as trash dumpsters, catch basins, bulk raw grain bins, storage bins, insect traps, enclosed utility boxes, and storage units. Also for use in non-perishable packaged and bagged and bulk stored processed and raw agricultural commodities (such as soybeans, corn, grains, cocoa beans and peanuts), Also for use in the following unoccupied structures, provided they are unoccupied for more than 4 months immediately following placement of a pest strip: vacation homes, cabins, mobile homes, boats, farm houses, and ranch houses.

"A Clothes Moth Killer" – "Use as a Moth Killer"

"A Fly Killer" – "Use as a Fly Killer"

(Optional or Alternate wording)

Controlled release (technology) ♦ Continuous (slow) release technology (action) ♦ Sustained release (technology) ♦ Moth Killer ♦ Kills Flying and Crawling Insects 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 ♦ Unscented - No Unpleasant Odor ♦ Leaves No Odor ♦ Clean, Odorless, deep penetrating vapor (action) ♦ No-mess vapor technology ♦ Leaves no mess (residue) ♦ Kills Moths ♦ A Clothes Moth Killer ♦ Non-staining ♦ Will not damage natural or synthetic materials ♦ Use as a Moth Killer ♦ Keeps protecting (insects out) for up to 4 months ♦ Works up to 4 months ♦ Long term (enclosed) space protection ♦ Continuous (insect) protection for up to 4 months ♦ Keeps killing up to 4 months ♦ Lasts up to 4 months ♦ Kills up to 4 months ♦ One strip treats up to 1200 cu ft (A space 8'x 10' x 15') ♦ Just hang or stand up in garages - Sheds - Attics

How it works: The Alco Large Pest Strip utilizes controlled release technology to slowly diffuse a deep penetrating vapor in enclosed spaces for up to 4 months. The clean, odorless vapor is evenly distributed throughout the enclosed treatment area, killing visible and hidden insects on contact and preventing new insect infestations (while you're away)

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/See Back for Additional Precautionary Statements
EPA Reg. No. 5481-531 EPA Est. No. 68643-GBR-001

Net Weight.

Two Sizes Available - See Chart for Space Treated with Each Size
65 g (2.29 oz), 80 g (2.82 oz)

AMVAC Chemical Corporation
4100 East Washington Boulevard
Los Angeles, California 90023, USA
www.amvac-chemical.com
1-323-264-3910

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
OCT 11 2006**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
5401-531**

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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 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.
<p>Have product container or label with you when calling a Poison Control Center or doctor or going for treatment For the following emergencies, phone 24 hours a day: Transportation: CHEMTREC 1-800-424-9300 Other: AMVAC 1-323-264-3910</p>	

STOP! READ ENTIRE LABEL BEFORE USE

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling Remove pre-assembled ALCO Large 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 strips 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 strip 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). This product controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, and earwigs and other insects as listed

- 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 hold of unit

Only available in 65 gram and 80 gram pest strip sizes

For use in unoccupied areas; not for use in homes except garages, attics, crawl spaces, and sheds occupied for less than 4 hours per day

Also for use in bathhouses, museum collections, animal buildings, reptile houses, motor control rooms, and milk rooms, or enclosed areas thereof, occupied for less than 4 hours per day

For use in unoccupied areas such as trash dumpsters, catch basins, bulk raw grain bins, storage bins, insect traps, enclosed utility boxes, and storage units Also for use in areas where non-perishable packaged and bagged and bulk stored processed and raw agricultural commodities (such as soybeans, corn, grains, cocoa beans and peanuts) are stored

Also for use in the following unoccupied structures, provided they are unoccupied for more than 4 months immediately following placement of a pest strip. vacation homes, cabins, mobile homes, boats, farm houses, and ranch houses

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HOUSEHOLD, INDUSTRIAL, AND COMMERCIAL USES

Vacation Homes, Ranch Houses, Farm Houses, Cabins, Mobile Homes, Boats that are unoccupied for more than 4 months immediately following placement of pest strip.

Garages, Storage Units, Attics, Crawl Spaces, Boathouses, Sheds, Museum Collections Occupied for Less than 4 Hours Per Day.

Controls flies, mosquitoes, gnats and other insects as listed

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 g 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 four (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 (4) month period or when effectiveness diminishes.

Trash Dumpsters

For control of flies in garbage dumpsters, attach the strip (One strip treats 900 to 1200 cu ft) inside dumpster. Keep lid on dumpster closed.

Animal Buildings Occupied by People for Less than 4 Hours Per Day

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 Occupied by People for Less than 4 Hours Per Day

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 such as corn, soybeans, cocoa beans and peanuts. For control of stored product insects including 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 strips required for treatment. Treat in early Spring before moths begin to emerge. Replace strip when needed to prevent egg laying by moths. Hang strips so as not to impede air circulation. When multiple strips are required, distribute them uniformly over the treated space.

Catch Basins

To control mosquitoes breeding in catch basin, suspend one (80) 65 g strip about ten inches above water level. Usual control lasts 10 to 15 weeks.

Enclosed Utility Boxes

To control Fire Ants, Wasps and other insects as listed which commonly infest utility enclosures, cabinets, conduits, junction boxes, and enclosed electrical panels. Remove from sealed bag and hang or stand so air can contact all sides of the strip. One strip treats 900 to 1200 cubic feet. Record installation date and replace when effectiveness diminishes.

Reptile Houses Occupied by People for Less than 4 Hours Per Day

For control of mites on reptiles. In Reptile Houses: Hang appropriate number of (80) 65 g strips per 1,000 cu ft for the space to be treated. Do not over treat.

How much space will one strip treat?

Strip Size	Treats	Approx. Equivalent to Area Measuring
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.

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.

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HOUSEHOLD USES

Attics, Garages, Sheds, and Enclosed Crawl Spaces Occupied for Less than 4 Hours Per Day

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 g 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 four (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 (4) month period or when effectiveness diminishes.

STORAGE AND DISPOSAL

Storage: Do not contaminate water, food or feed by storage or disposal. Do not open or remove from package before ready to install. Store in a cool dry place. **Disposal: If empty:** Do not reuse container. Place in trash or offer for recycling if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms 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.

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

AMVAC Chemical Corporation
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1-323-264-3910

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MARKETING CLAIMS:

How it works: The Large Pest Strip utilizes controlled release technology to slowly diffuse a deep penetrating vapor in enclosed spaces for up to 4 months. The clean, odorless vapor is evenly distributed throughout the enclosed treatment area, killing visible and hidden insects on contact and preventing new insect infestations (while you're away).

Controlled release (technology) • Continuous (slow) release technology (action) • Sustained release (technology)

Kills flying and crawling insects as listed • Leaves No Odor • Clean, Odorless, deep penetrating vapor (action) • No-mess vapor technology • Leaves no mess (residue) • Non-staining • Will not damage natural or synthetic materials • Lasts up to four (4) months • Keeps protecting (insects out) for up to 4 months • Works up to 4 months • Long term (enclosed) space protection • Continuous (insect) protection for up to 4 months.

(Just) Hang or stand up in: Garages, Crawl Spaces, Storage Units, Sheds, Attics and more (others)*

*See back for details

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:

Garages, Storage Units, Crawl Spaces

Questions & Comments:

Call [telephone number] or visit our website at [web address]

STOP! READ ENTIRE LABEL BEFORE USE.

DIRECTIONS FOR USE

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

Remove pre-assembled (product name) from sealed bag when ready to use. Place in desired location away from windows and out of reach of children and pets. Drafts, weather and other conditions may affect the performance, but treatment usually lasts for four (4) months. One 65 g strip will treat 900-1200 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 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 sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and product storage (after canning or bottling). This product controls flies, gnats, mosquitoes, moths, silverfish, cockroaches, spiders, beetles, earwigs, and other insects as listed.

WHERE TO USE

FOR USE IN THE FOLLOWING:

VACATION HOMES, RANCH HOUSES, FARM HOUSES, CABINS, MOBILE HOMES, BOATS THAT ARE UNOCCUPIED FOR MORE THAN 4 MONTHS IMMEDIATELY FOLLOWING PLACEMENT OF PEST STRIP.

GARAGES, STORAGE UNITS, ATTICS, CRAWL SPACES, BOATHOUSES, SHEDS, MUSEUM COLLECTIONS OCCUPIED FOR LESS THAN 4 HOURS PER DAY.

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

TRASH DUMPSTERS

For control of flies in dumpsters, attach appropriate-sized strip (One 65 g strip treats 900-1200 cu. ft.) inside dumpster. Keep lid on dumpster closed.

ATTICS, GARAGES, SHEDS, AND CRAWL SPACES OCCUPIED FOR LESS THAN 4 HOURS PER DAY

FOR USE AS A FLY KILLER

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 65 g strip will treat 900-1200 cu. ft. which is about equal to an average room 10' x 13' with an 8-foot ceiling for up to four (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 (4) month period or when effectiveness diminishes.

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

GUARANTEED RESULTS OR YOUR MONEY BACK