

15 SEP 1993

Mr. Joseph E. Dyer
Agribusiness Marketers, Inc.
1201 Douglas Ave.
Kansas City, KS 66103

Dear Mr. Dyer:

Subject: Revised Labeling to add "me-too" sites
Revised basic and alternate formulations dated 5/5/93
Aqua-Kill Forte, EPA Reg. No. 6175-32
Submissions dated May 5, 1993

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the draft label is enclosed for your records.

1) Modify your label by adding the following to your Directions for Use or Precautionary Statements: "In hospitals, remove all patients prior to treatment. Ventilate area for 2 hours before returning patients."

2) Your labeling makes reference to areas that are clearly designated as USDA meat and poultry processing plants. You must delete all references to use in meat and poultry plants unless you receive written authorization to do so from USDA. To obtain approval from USDA, you may address your concerns to:

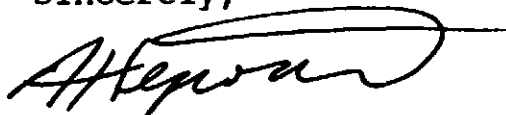
Mr. John Damare
U.S. Department of Agriculture
Food Safety & Inspection Service
Regulatory Programs
Building 306, BARC-East
Beltsville, MD 20705

3) Modify your label to by adding the word, "small", to the description of "flying moths" on the label; this is consistent with label of the similar pesticide referenced in your submission, (EPA Reg. No. 4816-707). Any other description could require additional data under 40 CFR 158.

This letter will also acknowledge receipt of the revised basic and alternate formulations dated May 5, 1993. The basic formulation referred to above, submitted in connections with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A copy of the basic Confidential Statement of Formula has been placed in the appropriate file. However, the alternate formulation includes d-limonene which has not currently been exempted from the requirements of a tolerance. All inert ingredients must be "cleared" for uses when there is a risk of contamination in food; this includes food handling establishments. You must therefore address this concern in the following manner before further consideration can be given to the proposed alternate formulation:

- a) Consider substituting an inert which is currently exempted from tolerances for food uses.
- b) Cite a product containing d-limonene which depict the proposed use patterns in question (food handling uses).
- c) Pursue an exemption from tolerances for d-limonene by submitting the appropriate data. You may contact Tina Levine at 308-8393 regarding these requirements.

Sincerely,



Adam Heyward
Acting Product Manager (10)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

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ACCEPTED
with COMMENTS
in EPA Letter Dated

15 SEP 1993

PRODUCT: AQUA-KILL FORTE
EPA Reg. No.: 6175-32A
PRODUCT No:
DATE: 04/26/93
SUPERSEDES: NONE

MIX No.:
ITEM: Container Label

COMMENTS: Revised Draft Label For Submission To EPA.

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

Draft Label
Front Panel

6175-32

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(Logo)

AQUA-KILL FORTE

Contains Pyrenone Emulsifiable Insecticide Concentrate

May be applied as a wet spray in food plants while in operation

Provides rapid kill of insects without objectionable residues

An Aqueous, Stable Micro Emulsion for indoor or outdoor application as a space, area or contact spray. Aqua-Kill Forte may be applied through mechanical, aerosol or ULV generators, thermal fogging equipment as well as conventional fogging or spraying equipment. Authorized for use in all areas of official establishments operating under the Meat, Poultry, Shell Egg Grading and Egg Products Inspection Programs.

FOR USE ON LIVESTOCK AND PETS TO CONTROL FLEAS AND BROWN DOG TICKS

INDOOR USE AREA: BAKERIES, BEVERAGE PLANTS, CANNERIES, FLOUR MILLS, FOOD PROCESSING PLANTS, GRAIN ELEVATORS, GRANARIES, HOMES, HOSPITALS, MEAT PACKING PLANTS, MOTELS, OFFICE BUILDINGS, RAILROAD CARS, RESTAURANTS, SCHOOLS, SHIP'S HOLDS, STORAGE OR PROCESSING AREAS OF DRIED FOOD PRODUCTS, SURFACES OF BAGS OF STORED FOOD PRODUCTS, SUPERMARKETS, TRUCK TRAILERS AND WAREHOUSES.

OUTDOOR USE AREAS: DAIRIES, DRIVE-IN RESTAURANTS, DRIVE-IN THEATERS, GOLF COURSES, PARKS, MILKING PARLORS, MILK ROOMS, PLAYGROUNDS, POULTRY HOUSES, RECREATION AREAS, URBAN AREAS AND ZOOS.

Active Ingredients:

Pyrethrins	0.20%	w/w
Piperonyl butoxide technical*	2.00%	
Inert Ingredients:	97.80%	
	TOTAL	100.00% w/w

* Equivalent to 1.60% (butylcarbityl) (6-propylpiperonyl) ether and 0.40% of related compounds.

Keep Out Of The Reach Of Children
CAUTION

See Side/Back Panel For Additional
Precautionary Statements

NET CONTENTS: 16 fl. oz. (473.2 ml)
EPA Reg. No.: 6175-32

EPA Est. No.: 6175-LA-1

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Draft Label
Side/Back Panel

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AQUA-KILL FORTE

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Avoid contact with eyes or skin. Do not breath spray mist. Wear mask or respirator of a type recommended by the U.S. Bureau of Mines to give adequate protection against this material. Wear protective clothing. Wash exposed skin surfaces with soap and water after handling and before eating or smoking. Wash all contaminated clothing with soap and water before reuse.

Do not apply directly to food. Do not apply directly as a space spray while food processing is underway. Foods should be removed or covered before treatment. Thoroughly wash all food processing surfaces before reuse. After spraying in meat packing plants wash with a suitable detergent and rinse with potable water all equipment, benching, shelving, etc. where exposed food will be handled. Remove pets, birds and cover fish aquaria before spraying.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a Physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, shrimp, crab and other aquatic organisms. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated.

BEST AVAILABLE COPY

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Draft Label
Side/Back Panel

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AQUA-KILL FORTE

DIRECTIONS FOR USE

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

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons. Do not enter treated areas without protective clothing until sprays have dried.

The insecticidal components of this concentrate, Pyrethrins and Piperonyl butoxide, are classified as food additives, and allowable tolerance levels will not be exceeded, when used as directed.

AQUA-KILL FORTE is designed to be used as is or diluted with water as stated here under these directions for use. The spray solution should be applied using good mechanical or compressed air fogging equipment.

SHAKE WELL BEFORE USING:

LIVESTOCK AND PETS

TO CONTROL FLEAS:

Wet the animal by dipping or spraying. For best results against Fleas and Ticks on Dogs, the kennels or animal quarters and bedding should also be treated. Provides protection against reinfestation.

TO CONTROL FLEAS AND BROWN DOG TICKS:

For initial clean up of severe infestation, thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind base boards, moldings, windows and door frames and the entire floor and floor coverings. Fresh bedding should be placed in animal quarters following treatment. Concurrent treatment of animals with an approved insecticide is recommended. Repeat treatment as needed.

Start spraying at the tail of the animal, moving the dispenser rapidly making sure that the entire body of the animal is covered, including the legs and underbody. While spraying fluff the hair so that the spray will penetrate to the skin. Apply until the hair is thoroughly moist. Do not spray into eyes or mouth of animal.

BAKERIES, BEVERAGE PLANTS, CANNERIES, FLOUR MILLS, FOOD PROCESSING PLANTS, GRAIN ELEVATORS, GRANARIES, HOMES, HOSPITALS, MEAT PACKING PLANTS, MOTELS, OFFICE BUILDINGS, RAILROAD CARS, RESTAURANTS, SCHOOLS, SHIP'S HOLDS, STORAGE OR PROCESSING AREAS OF DRIED FOOD PRODUCTS, SURFACES OF BAGS OF STORED FOOD PRODUCTS, SUPERMARKETS, TRUCK TRAILERS AND WAREHOUSES.



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Draft Label
Side/Back Panel

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AQUA-KILL FORTE

DIRECTIONS FOR USE (CONT'D)

TO CONTROL FLYING MOTHS AND EXPOSED STAGES OF FLIES INCLUDING FRUIT FLIES, MOSQUITOES AND GNATS:

Close doors and windows and shut off ventilating systems. Dilute at a ratio of 1:3 with water. Apply as a fog or fine mist directing spray towards the upper portions of the room and toward windows and other light sources that attract these insects. Thoroughly fill the area using 1 to 2 ounces per 1000 cubic feet. Keep area closed for ten minutes or more. Vacate after treatment and ventilate before reoccupying. Repeat treatment as needed.

TO CONTROL ANTS, COCKROACHES, CRICKETS, CLOVER CHEESE MITES, CONFUSED FLOUR BEETLES, BOXELDER BUGS, SCORPIONS, CIGARETTE BEETLES, CADELLES, DRUGSTORE BEETLES, GRANARY WEEVILS, GRAIN MITES, MEALWORMS, RICE WEEVILS, RUST RED FLOUR BEETLES, SILVERFISH, SPIDERS, BEETLES, WATERBUGS, PALMETTO BUGS, CENTIPEDES, MILLIPEDES, SOWBUGS, AND PILLBUGS:

1) For initial cleanout apply as a coarse droplet surface spray using approximately one gallon to 750 square feet. Spray thoroughly all surfaces where these insects are usually found including walls, baseboards, moldings, doors, cabinets, shelves, sinks, and pipes with special attention to cracks and crevices, niches, dark corners, drains and similar hiding places. Treat ant trails, nests and runs. When possible, spray insect directly. Repeat treatment at the same rate of application after an interval of one month if reinfestation occurs. This dilution may not be used in edible product areas of Federally inspected areas of meat and poultry plants.

2) In Federally Inspected meat and poultry plants, dilute 1:1 with water and apply as a coarse spray droplet surface spray using approximately 1 gallon to 750 square feet. Spray thoroughly all surfaces where these insects are usually found including walls, baseboards, moldings, doors, cabinets, shelves, sinks, and pipes with special attention to cracks and crevices, niches, dark corners, drains and similar hiding places. Treat ant trails, nests and runs. When possible spray insect directly. Repeat treatment at the same rate of application after an interval of one month if reinfestation occurs.

TO CONTROL CARPET BEETLES:

For initial clean up of severe infestation, spray the edges of carpeting and under carpeting and rugs. Make localized applications to floors and baseboards. Spray directly into cracks, crevices, closets and infested areas of shelving. Repeat treatment as needed.

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AQUA-KILL FORTE

DIRECTIONS FOR USE (CONT'D)

TO CONTROL BEDBUGS:

For initial clean up of severe infestation, spray the edges of carpeting and under carpeting and rugs. Make localized application to floors and baseboards. Spray directly into cracks, crevices, closets and infested areas of shelving. Repeat treatment as needed.

STORED GRAIN

TO CONTROL EXPOSED ACCESSIBLE STAGES OF INDIANMEAL MOTH AND AUGOUMIS GRAIN MOTH:

Apply to the surface of the binned grain at a rate of 2 gallons per 1000 square feet (1.6 pints per 1000 square feet). Apply at monthly intervals beginning with the first appearance of Moths and continuing until early fall. In case of severe infestation, break up webbing with rake before spraying and make a second application in two weeks.

MILLS, ELEVATORS AND GRANARIES

TO CONTROL ACCESSIBLE STAGES OF GRANARY WEEVILS, RICE WEEVILS, CONFUSED FLOUR BEETLES, RUST RED FLOUR BEETLES, CADELLES, DRUGSTORE BEETLES, MEALWORMS, SAWTOOTHED GRAIN BEETLES, SPIDER BEETLES, CHEESE MITES, GRAIN MITES, SILVERFISH AND RED RUST BEETLES:

1) For rapid initial kill of exposed or accessible stages, clean out any waste grain, dust, dirt or debris and destroy before spraying. Apply as a coarse droplet spray using approximately 1 gallon to 1,500 square feet of surface. Infested stored products should be fumigated or treated by other effective methods, using an approved product intended for this use. In mills, elevators and granaries, thoroughly spray floors, walls and other surfaces of bins, storage and handling areas with particular attention to cracks, crevices and similar protected locations. Treat unloading, handling and processing areas and apply the insecticide to conveying, processing and handling equipment, such as the inside of reel conveyors, purifier conveyors, sifters, roll housing and hoppers, pick up conveyors, etc. Spray thoroughly around the base of heavy machinery and equipment. Thoroughly treat walls, floors, shelves, and other exposed surfaces and lightly spray each layer of cartons or containers stacked. Sack surfaces of bagged grain can be sprayed until slightly moist.

2) For protection in transit, treat truck beds, box cars and ship holds before loading. Apply at a rate of 1 gallon to 1500 square feet of surface with particular attention to cracks, crevices and similar hiding places.

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AQUA-KILL FORTE

DIRECTIONS FOR USE CONT'D

AROUND RESIDENTIAL AREAS, RURAL FIELDS OR WOODS, LOTS, ROADSIDE
EDGES, PATHWAYS, AND COASTAL VEGETATION AREAS:

TO CONTROL BROWN DOG TICKS:

Apply with a mist blower applicator calibrated to deliver 4 1/2
gallons per acre at 200psi. Make application during peak of
infestation and repeat if necessary. Apply directly to vegetation
where the ticks rest.

BARNs, MILKING PARLORS, MILK ROOMS, DAIRIES AND POULTRY HOUSES:

TO CONTROL FLIES, MOSQUITOES AND GNATS:

Apply as a fine mist or fog directing the spray toward the ceiling and
upper corners until the area is filled with mist using about 1 ounces
per 1000 cubic feet of space. For best results close doors and windows
before spraying and keep them closed for ten to fifteen minutes.
Vacate the treated area and ventilate before reoccupying. Repeat
application as necessary.

IMPORTANT: THE FINAL PRINTED LABEL MAY NOT INCLUDE USES IN FOOD
PROCESSING PLANTS WITHOUT PRIOR USDA APPROVAL.

STORAGE AND DISPOSAL

Storage: Store in original container in a cool dry place inaccessible
to children or pets.

Pesticide Disposal: Securely wrap original container in several layers
of newspaper and discard in trash.

Container Disposal: Do not reuse bottle. Rinse thoroughly before
discarding in trash.

NOTICE OF WARRANTY

AGRIBUSINESS MARKETERS, INC. MAKES NO WARRANTY OF MERCHANTABILITY,
FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED
CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE
PRODUCT UNDER NORMAL CONDITIONS IN ACCORD WITH THE STATEMENTS MADE ON
THE LABEL.

Agribusiness Marketers, Inc.
2667 West Dual Street
Baton Rouge, LA 70814

(lot number statements as needed)

Mfg. & Printed in U.S.A. (label revision number) (product number)

