

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 25 2003
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Ms. Priscilla MacLean
Product Development Manager
Hercon Environmental Corporation
P.O. Box 467
Emigsville, PA 17318-0467

**Subject: Hercon Mosquito Attractant (EPA Reg. No. 8730-62);
Amendment to Add Unit Packaging of Four 150 or 180 mg Octenol Emitter
Strips per Retail Package; Application dated September 18, 2002.**

Dear Ms. MacLean:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) and section 4 when the Agency requires all registrants of similar products to submit such data.
2. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Please note, the application as submitted for an amended label also required additional consideration for the requirement of Child Resistant Packaging (CRP) due to the unit packaging statements. While processing and review of this label amendment did not require new data, this determination is based on the limited data presently available to us.

CONCURRENCES							
SYMBOL	7511C						
SURNAME	Peterson						
DATE	3/27/03						

The Agency considers the requirement for CRP data on a case-by-case basis. In most cases, the toxicological database contains sufficient information to determine an LD₅₀ for the active ingredient (a.i.) and to furthermore characterize the response to various doses of the a.i. in question. At present, the Agency has limited data for octenol that indicates the LD₅₀ for this a.i. is 340 mg/kg, based on a study using rats. There are no data to further characterize the response for doses below the LD₅₀. Without the additional data, the Agency can make the typical computations to determine a product LD₅₀ for CRP purposes, but this is inadequate to indicate what might happen if a child gains access and is exposed to lower levels of octenol. Computing a product LD₅₀ based on the saliva solubility testing and the amounts of a.i. you propose for unit packaging purposes would, on paper, allow for the assumption that unit packaging is acceptable.

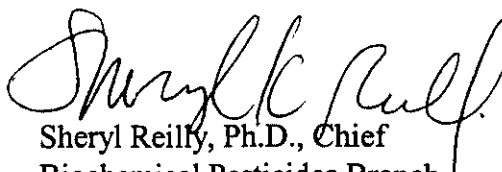
The Agency, is making its determination on the amount of a.i. released during the saliva solubility studies, the manner in which the product is packaged, the way the products will be used in pesticide application equipment, and the likelihood that a child will ingest octenol from single or multiple emitter strips as manufactured and packaged by your company.

The Agency has determined that the registrant must be aware that while it appears unlikely that a child will die from octenol exposure, there is no way to determine at what level or dose a child exposed to the active ingredient might become ill. However, your emitter strips are packaged within Mylar enclosures that are not easily opened, even by an adult, without the assistance of scissors. Further, as described to us by telephone communication (T. Peterson and P. McLean on March 6, 2003), the four Mylar enclosures will all be opened at one time and all four emitter strips will be put directly into the application equipment. This appears to include insertion within a compartment that is difficult to open without some mechanical assistance. Assuming the entire package contents are routinely needed to operate the equipment, this means that only in rare instances will extra (unused) emitter strips be available for a child to ingest.

The Agency considers, based on risk management considerations, the potential for a child's exposure to the octenol in your product is limited and thus unit packaging is acceptable where four 150 or 180 mg octenol emitter strips are packaged in Mylar pouches and sold in a fiberboard box.

Contact Dr. Peterson, at 703-308-7224, if you have any further questions concerning your application.

Sincerely,



Sheryl Reilly, Ph.D., Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division

enclosure

**HERCON®
MASTER LABEL
MOSQUITO
ATTRACTANT**

**1-Octen-3-ol Emitter Strip 150 (or Bait Chip 150) ^(A) 1-
Octen-3-ol Emitter Strip 180 (or Bait Chip 180) ^(B)
1-Octen-3-ol High Load Emitter Strip 1660 (or Bait
Chip 1660) ^(C)**

For Use with Electronic Insect Killers and Traps
Increases the Device's Effectiveness
in Killing Certain Mosquitoes and Biting Flies

Slow-Release Strip Designed to Emit
Mosquito Attractant for 30 Days

ACTIVE INGREDIENTS:

1-Octen-3-ol 6.3 %*

OTHER INGREDIENTS 93.7 %

TOTAL 100.0 %

*Equivalent to 150 mg 1-octen-3-ol per emitter strip (or bait chip) ^(A)
or 180 mg 1-octen-3-ol strip (or bait chip) ^(B) or
1660 mg 1-octen-3-ol per strip (or bait chip) ^(C)

CONTENTS: 1 Emitter Strip 150 (or Bait Chip 150) ^(A) or 1 Emitter
Strip 180 (or Bait Chip 180) ^(B) or 1 High Load Emitter Strip 1660 ^(C) (or
Bait Chip 1660) or 4 Emitter Strips 180 (or Bait Chips 180) ^(C)

MINIMUM NET WEIGHT: 0.08 oz (2.4 g)/Emitter strip (or Bait Chip)
150 ^(A) or 0.1 oz (2.45g)/Emitter strip (or Bait Chip) 180 ^(B) or 0.93 oz (26.35
g)/High Load Emitter Strip ^(C) or 0.4 oz (11.44 g)/4 Emitter Strips (or Bait
Chips) 180 ^(B)

KEEP OUT OF REACH OF CHILDREN

C A U T I O N

Read Directions and Precautionary Statements Before Use

**HERCON® MOSQUITO ATTRACTANT
1-Octen-3-ol Emitter Strip 150
or 1-Octen-3-ol Emitter Strip High Load
or 1-Octen-3-ol Emitter Strip 180**

For Use with Electronic Insect Killers and Traps

The Hercon Mosquito Attractant is intended for use as a lure with an electronic insect killer ("bug zapper") such as Stinger or Blue Rhino, and all other brands, or traps. It is designed to release 1-octen-3-ol, an insect attractant, continuously for 30 days. Trap or zapper effectiveness is increased by luring mosquitoes and biting flies to it.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed, absorbed through the skin or inhaled. Avoid contact with skin, eyes and mouth. Wash hands thoroughly with soap and water after handling.

FIRST AID:
IF ON SKIN OR CLOTHING • 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 • 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 • Call the poison control center or doctor immediately for treatment advice • Have the person sip a glass of water if able to swallow • Do not induce vomiting unless told to do so by the poison control center or doctor • Do not give anything by mouth to an unconscious person. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

DIRECTIONS FOR USE

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

When ready to use, remove mosquito attractant dispenser from pouch. Attach dispenser to outer enclosure by placing it in the appropriate attachment on the zapper or trap. When used as trap lure, read attachment directions on trap label for best results. Replace attractant dispenser after 30 days for zappers. Replace every 21 days when used in propane traps.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal

PESICIDE STORAGE: Store in a cool dry place. Do not reuse empty pouch or dispenser.

PESTICIDE DISPOSAL: Wrap dispenser in paper and discard in trash.

Made in the USA by

HERCON
Environmental
HERCON ENVIRONMENTAL
Emigsville, PA 17318-0435

EPA Reg. No. 8730-62

EPA Est. No. 8730-PA-01

®"HERCON" is a registered trademark of Aberdeen Road Company, Emigsville, PA.

^(A) 1-Octen-3-ol Emitter Strip (or Bait Chip) 150 - 150 mg 2 sq in

^(B) 1-Octen-3-ol Emitter strip (or Bait Chip) 180 mg 2.4 sq.in.

^(C) 1-Octen-3-ol Emitter Strip High Load 1.66 gm 22.13 sq. in.

**ACCEPTED
with COMMENTS
to EPA Letter Dated**

MAR 25 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
no amended, for the pesticide
registered under EPA No. 8730-62

Alternative Directions for Hercon Mosquito Attractant

DIRECTIONS FOR USE for the Blue Rhino SkeeterVac SV1000 Mosquito Exterminator and Fine Tune Maximum Protection Bait System

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

The Bait Chip – Mosquito Attractants intended for use as a lure with insect killer traps. It is designed to release 1-Octen-3-ol, an insect attractant, continuously for 21 days. Luring mosquitoes with the use of Bait Chip - Mosquito Attractant, increases trap effectiveness.

1. Turn off SkeeterVac by turning propane cylinder value to the OFF position.
2. Remove collection tray and dispose of used bait chips.
3. Refer to the enclosed Fine Tune Maximum Protection Bait System Guide for the recommended baiting for your outdoor environment.
4. Cut open sealed pouch; remove the recommended number of Bait Chips for your environment, placing them in the Fine Tune Bait Chip Tray in the upright position as shown. (See top illustration).
5. Place the loaded Bait Chip Tray in trap cover well. (See bottom illustration). It is recommended to wash hands with soap & water after having contact with bait chips.
6. Securely attach the collection tray to the unit, open propane cylinder valve to the ON position and restart SkeeterVac.

Recommended: Replace or clean SkeeterVac Trap Net (Model CPSX190234) during baiting process.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

STORAGE: Store in a cool dry place. Do not reuse empty pouch or dispenser.

DISPOSAL: Wrap dispenser in paper and discard in trash

DIRECTIONS FOR USE FOR ELECTRONIC INSECT OR BUG KILLERS: For use in Stinger electronic insect killers or other mosquito traps that use octenol as an attractant.

1. Remove lure from pouch and snap into the built-in holder at the bottom of the Stinger Insect Killer.
2. For other bug zappers or mosquito traps place lure in the small cassette provided and attach to the outer enclosure of trap (Illustrations of the built-in holder and cassette)

ADDITIONAL CLAIMS FOR ZAPPER: Attaches to any electronic bug killer. For Use with ALL electric insect killers and traps

NOTES FOR HERCON MOSQUITO ATTRACTANT LABEL

Configurations A and C are distributed by Stinger a Division of Kaz, Inc. Company No, 44640. One or 2 Emitter Strips (either 150 mg or 1.66 gm) per fiberboard envelope

Configuration B is distributed by Blue Rhino Corporation No. 74939. 4 Emitter Strips 180 or Bait Chips 180 per over pouch.