

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 15 2002

Ransom Hinton
Vinings Industries, Inc.
245 TownPark Drive, Suite 200
Kennesaw, GA 30144-5515

**Subject: AMA-30
EPA Reg. No. 9386-11
Your Amendment Dated 1/31/2002**

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to provide an updated main label dated January 30, 2002, which revises the "First Aid" statements to those required for the product in PR Notice 2001-1, is acceptable with the following label requirements.

1. It is not clear why the use directions for "Paper Mills" on this label are much less detailed than those for the similar "Paper Mill Slime Control" use on EPA Reg. No. 9386-7. Both products have identical active ingredient percentages and should have identical use directions if these are identical paper production uses. For example, this label is missing any reference to initial dose, subsequent dose, and has a dose range from 1.33 -26.7 ounces versus 6-30 ounces on the other label. With your next amendment for this product, you must bring the paper mill use directions in this label into harmony with those on the label for EPA Reg. No. 9386-7, or explain and justify why the use directions are different for each.

2. In addition to the 20 gallon and 55 gallon containers, your application states that the product is shipped in IBC's (Intermediate Bulk Containers) and bulk shipments. The Agency understands IBC's to be commonly called "totes" (often 300 gallon plastic containers with an outer metal cage), and bulk sizes to refer to tank trucks and rail cars. The label must include precise disposal instructions that apply to IBC and bulk containers sizes. For example, IBC's and bulk containers are generally returned to the sender un-rinsed, and the label needs to mention this fact clearly.

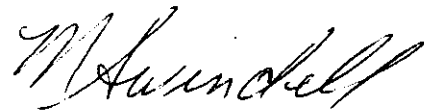
Your amendment mentions that the "Technical Data Sheet" is not included because it does not accompany the shipped product. Please note that the data sheet and any other non-stamped pesticide product information must also be in harmony with the main label and with FIFRA regulations.

A stamped copy of the accepted label is attached for your records.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I
Antimicrobials Division (7510C)

