7/31/2001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JUL 3 1 2001

Ms. Barbara J. Varner Director, Regulatory Affairs Unicorn Laboratories 12385 Automobile Blvd Clearwater, FL 33762

Subject: Amendment: Revised Final Label Unicorn Delta Dust EPA Registration No.28293-322 Your submission dated July 2, 2001

Dear Ms. Varner:

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The amendment referred to above, submitted in connection with registration under section 3(c)(7)(B) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below:

- As per PR Notice 2001-1, please change the heading "Statement of Practical Treatment" to "First Aid". Change the first aid directions to read "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. Have the product container or label with you when calling a poison control center or doctor, or going for treatment."
- 2. Either delete all statements that direct the user to "repeat as necessary" or "retreat as necessary", or indicate a time period for follow-up treatment based upon the residual efficacy of your product.
- 3. Under "Roses…", either delete the phrase "or as long as insects continue to appear" or change it to read "For as long as insects continue to appear."
- 4. Under "Fleas...", either delete the statement "Apply as needed for control" or revise it based on the residual efficacy of your product.

A stamped copy of the label is enclosed for your records. If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely, George T. LaRocca Product Manager 13

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Product Manager 13 Insecticide Branch Registration Division (7505C)

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Enclosure

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UNICORN DELTA DUST

For Indoor/Outdoor Residential Use Only

* For Household Use

* Kills *Termites

* Non-Staining and Odorless

* Long-Lasting Residual Action

* Long-Lasting * Kills Insects for Up to 8 Months * Does Not Clump or Absorb Moisture

* Household Ornamental Garden Insect Control .

ACCEPTED COMMENTS in KPA Letter Dated

JUL 3 1 2001

* Controls Fire Ants, Fleas, Ticks, and More e Federal Insesticide, Micicle Act - RPA Rog. 28293-322

* For Use on Ornamentals * Use on Roses. Flowers and Ornamentals *** Controls Many Different Insect Pests** * To Control Imported Fire Ants on Lawns and Other Residential Areas * 8 oz. Treats 15 Fire Ant Mounds * 1 lb. Treats 30 Fire Ant Mounds * 2 lbs. Treats 60 Fire Ant Mounds ***** Guaranteed to Work or Your Money Back * Fast, Effective Kill of Fire Ants * Fast, Effective Kill of Stinging Ants * East to Use *** Convenient** * Kills Fire Ants on Contact * Ready-To-Use * Multi Purpose * Indoor: Ants, Fleas, Cockroaches and Silverfish * Outdoor: Crickets, Millipedes, Scorpions, Sowbugs and other listed insects **ACTIVE INGREDIENT:** Deltamethrin [(s) - alpha-cyano-3- phenoxybenzyl -(1R 3R)-3- (2-2 dibromovinyl)-2 2-dimethyl

cyclopropanecarboxylate]	0.05%
OTHER [INERT] INGREDIENTS	<u>99.95</u> %
	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION See Side/Back Panel (label) for Additional Precautionary Statements **NET CONTENTS:**

Manufactured for: **UNICORN LABORATORIES** 12385 Automobile Blvd. Clearwater, FL 33762

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EPA EST, NO: 28293-FL-1

IMPORTANT: Ready the entire Directions for Use, Precautions and Disclaimer of Warranties before using this product.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION: May be harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

Statement of Practical Treatment [First Aid]

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

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Use with care when applying in areas adjacent to any body of water. Do not contaminate water when disposing of equipment washwater.

STORAGE AND DISPOSAL

Storage: Store product in original container in a cool, dry, locked place out of the reach of children.

Container Disposal: Do not reuse empty containers. Wrap in several layers of newspaper and discard in trash.

DIRECTIONS FOR USE

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

This product is a ready-to-use insecticide dust which exhibits effective knockdown and long-lasting control against the pests listed when used according to label directions. It can be used for long-lasting pest control in and around homes and their immediate surroundings. Permitted areas of use include but are not limited to:

Animal Quarters Apartments Household Greenhouses Houses Mobile Homes and Recreational Vehicles Ornamentals

This product is intended for applications with a hand duster or from the shaker can, with a paint brush or by other suitable means, to hiding and runway areas and other places where insects are found.

INDOOR USE

In living areas, make applications in such a manner as to avoid deposits on exposed surfaces or introducing the material into the air.

To apply insecticide directly into cracks and crevices, use a bulbous duster or other suitable equipment. Apply lightly and uniformly to infested area. Pay particular attention to cracks and crevices; service ducts; false floors and ceilings; wall voids; around electrical and telephone fittings and equipment; around water and sewer pipes; under and behind cabinets, refrigerators and sinks;

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around windows and door frames; along baseboards; in attics and crawl spaces. The amount to be applied will vary with the site but should usually be in the range of 2 - 3 grams of product per square yard (or 0.5 lbs per 1000 square feet). Repeat as necessary to maintain adequate control.

Ants, Boxelder Bugs, Cockroaches (including both resistant and non-resistant strains), Crickets, Fleas, Firebrats and Silverfish: Apply product thoroughly to all areas where these pests crawl and hide, especially in those areas described above. For Ants, apply to ant trails, around doors and windows and other places where ants enter premises.

Termites, Carpenter Ants and Carpenter Bees: Apply to voids or channels in damaged wooden members of a structure; to cracks, spaces or bearing joints between wooden members of a structure; or between such members and the foundation; and in locations vulnerable to termite attack. Drilling may be necessary prior to applying dust in these locations, but it must be recognized that such drilling and treating of timber in a particular location may not result in complete coverage of infested and vulnerable voids or galleries. This dust can be applied in attics and crawl spaces to prevent entry of drywood and formosan termites at a rate of 0.5 lb per 1000 square feet of floor area. In these treatments, all vents and blowers should be closed. Inspect at 6 months and one year to insure that colony has been killed. Retreat if necessary.

*The purpose of such applications of this product is to kill workers or winged forms which may be present in the treated channels at the time of treatment. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but merely a supplement. For active termite infestations get a professional inspection.

Centipedes, Ground Beetles, Millipedes, Scorpions, Spiders and Sowbugs: Apply dust along and behind baseboards, to window and door frames, corners, pipes, storage locations, attics, crawl spaces, and other areas where these pests may enter or crawl.

Wasps and Bees: It is generally advisable to treat wasp and bee nests in the evening when insects are less active and have returned to the nest. Wear protective clothing if deemed necessary to avoid stings. Using hand or power duster (Actisol« or similar equipment) or other suitable means, with extension tubes if necessary, thoroughly dust nest, entrance and surrounding areas where insects alight. Nests in wall voids can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in and reseal. For ground wasps, dust entrance and surrounding areas. For best results check nests carefully one or two days after treatment to ensure complete kill, then remove and destroy nest to prevent emergence of newly-hatched insects. If removal is not feasible, retreat the nest, if necessary. Do not use this product to treat overhead nests.

Webbing Clothes Moths: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on the clothes. DO NOT apply this product directly to clothing.

Carpet Beetles (Black, Furniture, Common and Varied): Dust where these insects are found, for example: on and under edges of floor coverings, around baseboards, under rugs and furniture, and in closets.

Bedbugs: Apply dust thoroughly to all areas where these pests are typically found including: folds

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and tufts of mattresses, coils of springs, cracks and hollow posts of bedsteads, upholstery of chairs and sofas, picture frame moldings and all cracks and crevices in the room should be treated. Allow powder to remain in contact with surface for 4 - 6 hours. Thoroughly vacuum treated areas, dispose of vacuum bag and place clean linens on bed.

Stored Product [Pantry] Pests: To aid in the control of the exposed stages of:

cadelles merchant grain beetles red four beetles cheese mites cigarette beetles rice weevils confused flour beetles rusty grain beetles dark meal worms saw-toothed grain beetles spider beetles drugstore beetles grain mites tobacco moths granary weevils vellow meal worms lesser grain borers

In the home all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Clear up waste materials, dust, dirt and other debris. Thoroughly treat floors, walls and other surfaces in storage and handling areas. Apply dust in cracks and crevices, behind and under cupboards, and other difficult to reach areas where insects may hide. DO NOT apply directly on food, utensils or on areas where food is stored.

Ornamental Plant Pests: For the control of:

leafrollers
orange tortrix
periodical cicada
plant bugs
rose chafer
rose midges
rose slugs
tent caterpillars
thrips
weevils

Shrubs and Ornamentals: Apply when insects or their damage first appear and repeat at weekly intervals or as necessary. Apply 8 ounces per 1000 square feet; or thoroughly apply to place a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

Roses, Petunias, Chrysanthemums, Geraniums, Carnations and Other Related Flowers: To control many leaf and flower chewing insects, apply as soon as the insect appears and repeat at 7 day intervals or as long as insects continue to appear. Apply a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

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OUTDOOR USE

Perimeter Treatment: Use this product as a residual treatment for control of Ants, Bees, Centipedes, Cockroaches, Crickets, Firebrats, Fleas, Ground Beetles, Millipedes, Scorpions, Silverfish, Slugs, Sowbugs, Spiders, Ticks and Wasps. Make a residual treatment around windows and doors, porches, screens, eaves, patios, garages, under stairways, in crawl spaces and other areas where pests hide. To help prevent the invasion of buildings and structures by these pests, apply thoroughly and uniformly to the foundation and crawl spaces where pests are active and may find entrance.

Fleas and Ticks in Rodent Burrows: To control Fleas and Ticks in and around rodent burrows around homes and other buildings, apply dust with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge). Be sure to treat abandoned rodent burrows which are suspected of containing fleas and ticks. Treat for a minimum of 5 days for light rodent populations, 10 days when populations are dense. Apply as needed for control.

Use Directions for Fire Ant Treatment

Imported Fire Ant Mound Treatment: Apply product with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge of the mound). A second treatment may be necessary if complete control is not obtained. DO NOT DISTURB THE MOUND PRIOR TO APPLICATION. If possible, treat all colonies in the vicinity. Also, treat colonies which have not yet constructed a mound.

[Alternate directions - Evenly sprinkle one tablespoon (approximately ½ oz.) of this product over the top of each mound. Do not water in or disturb the mound. Apply when temperatures are between 65 and 80°F. Allow 3 to 4 days for maximum control, then repeat as necessary. Food utensils such as a teaspoon or measuring cup should not be used for food after use with pesticides.]

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

[] Brackets indicate alternate text.

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