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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

APR 0 1 2003

Mr. Dave Stevens Armatron International, Inc. 15 Highland Avenue Malden, MA 02148

SUBJECT:

Armatron Flowtron Mosquito Attractant (EPA Registration No. 34473-4); Amendment to Add Unit Packaging of Six 1660 mg Octenol Cartridges per Retail Package; Application Dated September 4, 2002.

Dear Mr. Stevens:

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.

The Agency, is making its determination on the amount of a.i. released during the crush and bite plus 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 cartridges 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, the octenol is enclosed within a cartridge that are is not easily opened. Further, cartridges when in use are put directly into the application equipment. This appears to include insertion within a compartment that for a child is somewhat difficult to open. Upon opening the multi-pack of cartridges, there will be extra (unused) units available for a child to access. The Agency considers the smell of the active ingredient and the shape, including edges and sharp corner of the flat top to the cartridge, as having some potential to discourage a child from attempting to ingest the octenol contained inside your product.

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 six 1660 mg octenol cartridges sold in a fiberboard box.

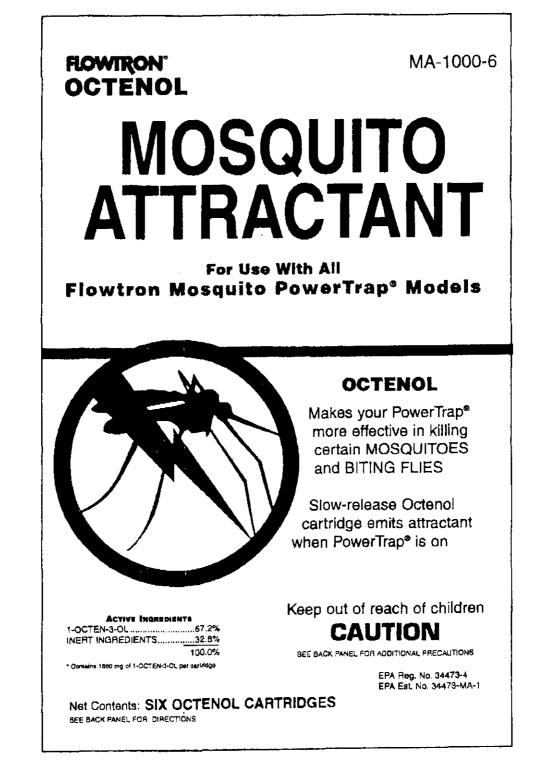
Contact Dr. Peterson, at 703-308-7224, if you have any further questions concerning your application.

Sincerely,

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

enclosure





ACCEPTED with COMMENTS In EPA Lation Dated

APR 0 1 2003

Under the Federal Insecticide, Fungicide, and Redenticide Act as areanded, for the posticide registered under EPA Rog. No. 74473-9

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