

SEP 27 1988

10651/1515
117

Enforcer Products, Inc.
c/o Kim Davis
Jackson and Davis Consultants
P.O. Box 118097
Carrollton, TX 75011-8097

Dear Ms. Davis:

Subject: Amendment - Update Label to Comply with PR Notices 81-3, 83-3,
84-1, and 87-8
Response to PR Notice 87-6
Update Confidential Statement of Formula
Enforcer Fire Ant Killer
EPA Registration No. 40849-13
Your Application Dated October 16, 1987 and August 24, 1988

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable provided that you make the changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Add an "*" to "Cyano (3-" and then place "*Licensed under U.S. Patent No. 4,062,968 of Sumitomo Chemical Company" under the ingredients statements.
2. On the Confidential Statement of Formula (CSF), provide the flashpoint of the product with propellant and flame extention. The flashpoint reported exceeds the one expected for this product. Please check and resubmit. Mixtures marketed under pressure, including those containing hydrocarbons, are subject in their entirety to tests indicated in Section 162.10(h)(2)(iii) of Title 40 of the Code of Federal Regulations. (Flashpoints are conveniently measured after collecting the liquid expelled from the container in an open cup chilled with dry ice.)

Then make the proper label change if needed.

53160: I: Richards: LR-1: KERCO 9/27/88 11/7/88: AS: JH: CL: JH: AS

REFERENCES

SYMBOL							
SURNAME							
DATE							

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With respect to your August 24, 1988 letter, the CSF submitted with the October 16, 1987 amendment (dated October 16, 1987) is considered the formula of record. For purpose of clarification, this product contains tetrachloroethylene (Perchloroethylene) only as the carrier in the product formulation.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

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

2074

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FRONT PANEL

ENFORCER

FIRE ANT

KILLER

Kills
Fire Ants

With Mound
Penetrating Rod

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 27 1988

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

40849-13

For Outdoor Use Only on Fire Ant Mounds

ACTIVE INGREDIENTS:

Tetramethrin [(1-Cyclohexene-1,2-dicarboximide) methyl 2,2-dimethyl-3-(2-methylpropenyl) cyclopropanecarboxylate]	0.200%
*Cyano (3-phenoxyphenyl) methyl-4-chloro-alpha-(1-methylethyl) benzeneacetate	0.400%

**INERT INGREDIENTS	99.400%
	<u>100.000%</u>

This product contains the toxic inert ingredient ~~Permethrin~~ *Do it need this*

* Licensed under U.S. patent No. 4,062,968 of Sumitomo Chemical company

** Contains petroleum distillates

Keep Out of Reach of Children

CAUTION

See back panel for additional precautionary statements.

NET WT. 19 OZ.

BACK PANEL - Enforcer Fire Ant Killer

FIRE ANT KILLER

DIRECTIONS FOR USE

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

For use in yards, parks, playgrounds, woodlands and golf courses. For outdoor use only.

Do not use until you have thoroughly read instructions below.

DO NOT DISTURB MOUND PRIOR TO TREATMENT

1. **IMPORTANT:** When attaching probe make sure spray head is pointed down.
2. Attach probe to aerosol can by screwing threaded part of rod into top of can. Once rod is completely seated, can will start spraying. Untwist until spraying stops.
3. With probe attached to can (but not spraying) insert rod 3" into top of mound.
4. Activate can by twisting rod into can.
5. Drive rod into mound activating continuously until resistance is felt indicating bottom of nest.
6. Untwist rod and remove.

TREAT ALL MOUNDS IN VICINITY

For best results apply in early morning or evening when ants are least active.

Storage: Store in a cool, dry place (preferably locked) inaccessible to children and pets and away from heat, open flame or other sources of ignition. **Disposal:** Replace cap, wrap container and probe in several layers of newspaper and discard in trash collection. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed or inhaled. Avoid breathing vapors. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and warm water after handling.

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Contact a physician or Poison Control Center immediately. If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated. Contact a physician if necessary. **If In Eyes:** Immediately flushy eyes with plenty of water. Contact a physician if irritation persists. **If On Skin:** Immediately remove contaminated clothing. Wash affected area of skin with soap and warm water. Contact a physician if irritation persists. Wash clothing prior to reuse.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near fire, sparks or heated surfaces. Do not smoke while using this product. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Incineration of container may cause explosion.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not apply where runoff is likely to occur. Do not contaminate water by disposal of wastes.

Product Code #IK-19

EPA Reg. No. 40849-13

EPA Est. 11715-TN-1

ENFORCER PRODUCTS, INC.
P.O. Box 1068; Cartersville, Georgia 30120