

Mr. Rob R. Adams, Jr.
Enforcer Products, Inc.
c/o Adams Technology Systems
5145 Forest Run Trace- Suite B
Alpharetta, GA 30202-4504

Dear Mr. Adams:

Subject: Amendment- gallon container with single dose
concentrate
Enforcer Esfenvalerate 35% Wettable Powder
EPA Registration No. 40849-62
Your Submission dated May 21, 1997

This 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 or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. On the front panel delete "Numerous" in the statement "Controls Numerous Pests In and Around Structures". You must specify which pest this product controls or reference pests as indicated below.

b. We assume that the target user for this type of packaging is primarily the homeowner. Thus delete the commercial sites warehouses, theaters, hotels, motels, office buildings, kennels and related statements. "Do not treat establishments where livestock feed is present." "xxx do not exceed more than one application every 14 days" and revise the front panel statement to read: "For Use Only In and Around the Home and other residential areas."

If it is your intent to keep commercial sites also then revise the front panel to read: "For Use in and Around the Home, Apartment Buildings, Kennels, and Non-Food/Feed areas of Warehouses, Office Buildings, Theaters, Hotels, Motels".

You would then retain the related statements above and also add the standard paragraph explaining what a non-food area is (see your initial label).

c. Under Indoor Pests Control add: "In the home all food processing surfaces, and utensils should be covered during treatment or thoroughly washed before use. Remove pets, birds and cover aquariums before spraying."

d. Under Mixing Directions revise the second and third sentences as follows: "This concentrate will make one gallon of "Enforcer Esfenvalerate RTU Insect Spray. It is intended to be used only in an empty Enforcer Esfenvalerate RTU Insect Spray one gallon container."

f. Since this packaging is the refill for the RTU product change the product name to read "Enforcer Esfenvalerate 35% Wettable Powder Refill".

3. Submit two (2) 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 constitutes acceptance of these conditions.

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

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

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NOTE: Label for Single Dose in Water Soluble Packet.

REGISTERED
with COMMENTS
in EPA Letter Dates
MAY 16, 1997
Under the Federal
Insecticide and Rodenticide
Act as amended for the purpose
of registration under the Act
40849-62

**Enforcer®
Esfenvalerate 35% Wettable Powder**

Controls Numerous Pests In and Around Structures

For Use in and Around the Home, Warehouses, Office Buildings,
Apartment Buildings, Theaters, Hotels, Motels, Kennels

Water Soluble Powder
EZ Mix - Just Add Water - Makes One Gallon
(Note: Drawing of Container & Sprayer may be added)

For Indoor and Outdoor Use

Perimeter Treatment Prevents Infestation of Buildings by
Ants, Crickets, Hornets, Scorpions, Wasps and Yellow Jackets

Kills Foraging Fire Ants on Contact!*

Kills Deer Ticks (which carry Lyme Disease) on Contact!

For Use on Lawns to Kill Fleas and Ticks

Also Kills Carpenter Ants, Cockroaches (including Asian Cockroaches), Crickets,
Fire Ants, Fleas, Scorpions, Sowbugs, Spiders and Ticks

ACTIVE INGREDIENT:

(S)-cyano(3-phenoxyphenyl)methyl-(S)-4-chloro-alpha-
(1-methylethyl)benzeneacetate 35.0%

INERT INGREDIENTS: 65.0%
Total 100.0%

Keep Out of Reach of Children

CAUTION

See back panel for additional precautionary statements.

NET WEIGHT: One 2.8 gram water soluble packet

EPA Reg. No. 40849-62

EPA Est. 40849-GA-1

*A registered fire ant mound treatment should be used in conjunction with this product.

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NOTE: Label for Single Dose in Water Soluble Packet.

**PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals**

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Avoid breathing dust. Avoid contact with skin, eyes and clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and warm water after handling. Remove contaminated clothing and launder separately before reuse.

Statement of Practical Treatment

If Swallowed: Call a physician or poison control center. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

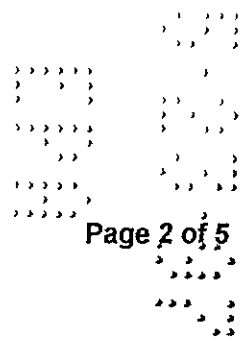
If in Eyes: Flush eyes with plenty of water. Get medical attention if irritation persists.

Environmental Hazards

This product is toxic to fish, birds and wildlife. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

Physical or Chemical Hazards

Do not use or store near heat or open flame. Do not use this product in or on electrical equipment due to the possibility of shock hazard.



NOTE: Label for Single Dose in Water Soluble Packet.

DIRECTIONS FOR USE

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

Cut along dotted line & remove water soluble packet.

MIXING DIRECTIONS

IMPORTANT: This is a single use packet. The entire contents of the packet are to be used at one time. This concentrate refill will make 1 gallon of insecticide spray. It is intended to be used in an empty 1 gallon container properly marked and labeled. It is not to be mixed or put into any other container or bottle.

Cut along dotted line and remove water soluble packet. Do not open this water soluble packet. The packet will dissolve when placed in water.

Put the unopened water soluble packet into the empty labeled 1 gallon container. Fill this container with 1 gallon of water. Replace the cap and shake contents until water soluble packet has completely dissolved.

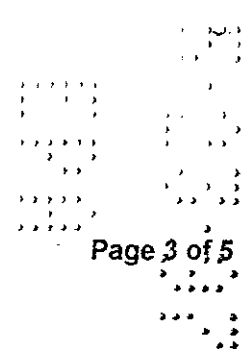
SPRAYER INSTRUCTIONS

How to prime and care for your sprayer:

1. After shaking product well, remove cap from container and replace with sprayer hose and cap assembly. Tighten securely.
2. Turn sprayer nozzle one half turn counter-clockwise. Hold sprayer below the level of container and prime by pumping trigger 10-15 times until product is dispensed. Adjust nozzle to fine spray or jet stream as needed.
3. To store, turn nozzle to "OFF" position and store with sprayer above level of liquid in container to prevent leakage.

(Alternate Step 2 for trigger type sprayer)

2. Turn sprayer nozzle until fully open. Hold sprayer.....(Remainder of Step 2 the same)



NOTE: Label for Single Dose in Water Soluble Packet.

FOR INDOOR PESTS:

GENERAL: Use this product to control the pests indicated in the listed areas as a contact spray by mixing one (1) water soluble packet in 1 gallon of water. Mix thoroughly before use. One packet per 1 gallon of water will make a spray containing 0.025% active ingredient. This product can be used as a crack and crevice, spot or general treatment. When used as a general treatment, apply at the rate of 1 gallon of diluted spray per 1,000 square feet of surface area. Each packet contains 2.80 grams of this product.

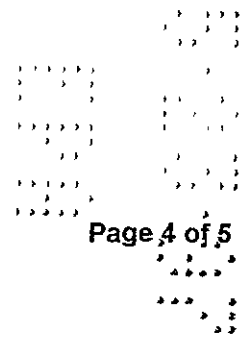
Apply as a coarse, wet spray to thoroughly treat hiding places, such as cracks and crevices, moist areas around pipes, under refrigerators, along baseboards or other areas where insects may frequent or hide. Spray directly on insects when possible. Do not permit humans or pets to contact treated surfaces until the spray has dried. Repeat as necessary. Do not treat establishments where livestock feed is present.

To Kill Cockroaches, Ants, Centipedes, Crickets, Millipedes, Psocids, Scorpions, Silverfish, Sowbugs, Spiders and Waterbugs: Apply this spray with a sprayer that produces coarse, wetting droplets into all cracks and crevices in woodwork, floors, underneath sinks, areas behind pipes, pieces of equipment or areas where these pests are found or may hide, including dark corners of rooms and closets; cracks and crevices in walls; along baseboards; around door and window frames; behind and beneath sinks, stoves, refrigerators, cabinets, around garbage cans, plumbing and other utility installations. Contact as many insects as possible with direct spray. Pests driven out of hiding places should be sprayed directly. For ants, apply to ant trails, around doors and windows and wherever these pests may find entrance. Repeat applications as needed, but do not exceed more than one application every 14 days.

To Kill Carpenter Ants: Apply as a coarse spray around doors, door frames, windows and other areas where ants enter premises or hide. Spray into cracks and crevices, through openings or small, newly drilled holes into wall voids where ants or their nests are present.

FOR OUTDOOR PESTS:

GENERAL: Use this product to control on contact: *cockroaches, ants, crickets, sowbugs, spiders and ticks.* Use at the rate of 1 gallon per 500 square feet to outside surfaces of buildings, porches, patios, garages and other areas where these pests are seen or found. Do not allow spray to contact ornamental plants or shrubs due to possible injury.



NOTE: Label for Single Dose in Water Soluble Packet.

Building Perimeter Treatment: To help prevent infestations of buildings by *ants, boxelder bugs, centipedes, crickets, hornets, millipedes, scorpions, sowbugs (pillbugs), spiders, wasps and yellow jackets*, treat a 2-6 foot band of soil or other substrate adjacent to buildings, building foundations to a height of 2-3 feet, eaves, crawl spaces or other areas where these pests are active and may find entrance. Apply as a coarse, wet spray at the rate of 1 gallon per 500 square feet. Repeat as needed. Keep children and pets off treated areas for 24 hours or until the grass has completely dried.

STORAGE AND DISPOSAL

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

STORAGE: Mix as needed. Do not store diluted material. Keep water soluble packets in original foil package and store in a cool, dry place. Do not store below 32°F. Handle carefully when stored at temperatures less than 50°F to avoid breakage of packets.

DISPOSAL: Do not reuse container. Wrap and put in trash.

PRODUCT CODE: XP-20SEC (or XP-ANT)

ENFORCER® PRODUCTS, INC.
P.O. Box 1060
Cartersville, Georgia 30120-1060

Made in U.S.A.

(Note: Following is copy for the actual water soluble packet)

DO NOT OPEN THIS POUCH - PLASTIC FILM WILL DISSOLVE IN WATER

Contains esfenvalerate

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

EPA Reg. No. 40849-62

**Refer to Label of Outer Package
for Directions and Precautions**