



48598-1

09/11/2003

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

SEP 11 2003

Mr. Jim Huber  
Natural Insecto Products, Inc.  
221 Sherwood Place  
P.O. Box 12138  
Costa Mesa, CA 92627

Subject: I.. Amendments: (1) Revised Confidential Statement of Formula (CSF)/  
Labeling in Accordance with PR Notice 2003-1; and (2) Additional  
Directions for Use in Poultry Housing. Your Submissions Dated June 9,  
2003 and July 1, 2003 (as Amended by FAX/Email)

II. Your Letter Dated July 24, 2003, Requesting Clarification Re: Allowable  
Uses and Claims for Diatomaceous Earth Products.

Insecto  
EPA Reg. No. 48598-1

Dear Mr. Huber:

**I. Amendments: (1) Revised Confidential Statement of Formula (CSF)/Labeling in  
Accordance with PR Notice 2003-1; and (2) Additional Directions for Use in Poultry  
Housing.**

The labeling referred to above, submitted in connection with registration under the  
Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy  
of the label is enclosed for your records.

The Confidential Statement of Formula (CSF), referred to above and submitted in  
connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as  
amended, is acceptable. A copy of the CSF (Basic Formulation, dated 09/10/03) has been placed  
in our file for the subject product. This CSF supersedes previously submitted CSFs for this  
product.

Please note that any future changes to your label or Confidential Statement of Formula  
(CSF) for this product must be allowable under the National Organic Program administered by  
the USDA, unless the change is to remove the Organic Production claim. Further, you are  
reminded that it is your responsibility to monitor future changes to the National Organic Program  
to assure that your product continues to meet the criteria for use under the program. If at some

time in the future a change to the program is made such that your product no longer meets the criteria, it is your responsibility to amend your label accordingly.


**II. Your Letter Dated July 24, 2003, Requesting Clarification Re: Allowable Uses and Claims for Diatomaceous Earth Products.**

You submitted advertising for a Diatomaceous Earth (DE) product intended for use to control "internal parasites" and "fleas" on dogs and asked whether DE is allowed for these applications. Internal parasites of man or other living animals are not considered to be "pests" as that term is defined in the pesticide regulations (40 CFR §152.5(b)), and products for use in controlling internal parasites are not considered to be pesticides. Since this is not a pesticidal use, it may not be included on an EPA-registered pesticide label. Products intended to control fleas on dogs are considered to be pesticides, and EPA has registered several DE products for this use. If you wish to include this use on your label, you should submit an application to amend the product label and submit/cite supporting efficacy data.

The submitted advertising includes pesticidal claims that would require the product to be registered as a pesticide under FIFRA. It also includes safety claims that would render a pesticide with such claims misbranded under FIFRA. EPA's Office of Enforcement and Compliance Assurance (OECA) handles investigations into possible violations of FIFRA, including sale and distribution of unregistered pesticides and misbranding complaints. You are encouraged to bring such complaints to the attention of OECA by contacting Ms. Mary McDonnell or Mr. Francis (Mickey) Post at the following address:

Environmental Protection Agency  
Toxics and Pesticides Enforcement Division (2245A)  
Ariel Rios Bldg.  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

If you have any questions regarding these actions, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,  
  
George T. LaRocca  
Product Manager (13)  
Insecticide Branch  
Registration Division (7505C)

Enclosure

**Precautionary Statements  
Hazards to Humans and Domestic Animals**

**CAUTION**

Use adequate ventilation and avoid breathing dust. Wear a suitable dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N,R,P or HE filter when using this product during prolonged exposure.

**INSECTS DIE FROM DEHYDRATION**

INSECTO is derived from diatomaceous earth refined to certain specifications. Insects that come in contact with INSECTO are lacerated by the microscopic particles and lose their body fluid (dehydration) which will cause their deaths. This is a physical control to which insects have a difficulty building up a resistance.

**STORAGE AND DISPOSAL:**

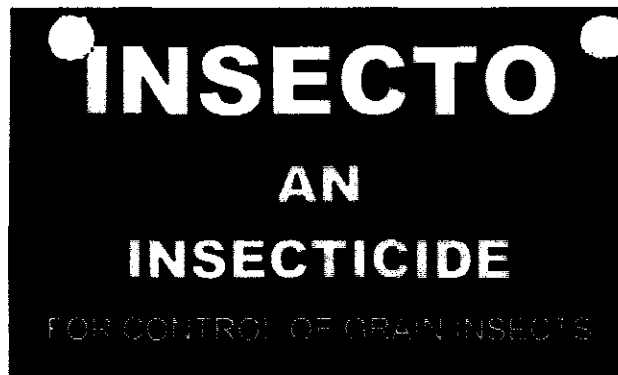
Do not contaminate water, food or feed by storage or disposal.

**STORAGE:** Store in a cool dry area.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. [For Bags] Do not reuse bag. Discard bag in trash.

**CONTAINER DISPOSAL:** [For Bags] Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke. [For plastic containers] Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**ACCEPTED**  
  
SEP 11 2003  
  
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 48598-1



**AND  
HOUSE INSECTS**

**For Organic Production**

**INGREDIENT STATEMENT:**

Active Ingredient  
Silicon Dioxide, from diatomaceous earth ... 90.0%  
Inert Ingredients ..... 10.0%  
TOTAL 100.0%

JAPAN REG. NO. 17078      INDONESIA R.I. 910-1-903  
CANADA P.C.P. NO. 22489      CHINA LS 94024  
SAUDIA ARABIA 1379-63-63      NICARAGUA NA-171A-6-93  
MALAYSIA LRMP R1/2850

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS  
RECOMMENDED FOR COMMERCIAL/INDUSTRIAL USE**

*Manufactured by:*  
**NATURAL INSECTO PRODUCTS, INC.**  
221 Sherwood Place  
PO Box 12138  
Costa Mesa, CA 92627

E.P.A. REG. NO. 48598-1-AA

E.P.A. ESTABLISHMENT NO. 48598-CA-1

NET WEIGHT: 25 LBS.

**DIRECTIONS FOR USE:**

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

INSECTO is intended for application with hand or power duster, or other suitable means, to hiding and running areas and places insects are found. To apply INSECTO into cracks and crevices, use Bulbous Duster or other suitable equipment.

INSECTO is an effective insecticide for killing exposed insects Rice Weevils, Granary Weevils, Angoumois Grain Moths, Mediterranean Flour Moths, Indian Meal Moths, Red Flour Beetles, Darkling Beetles, Lesser Mealworm and Tribolium in Empty Grain Bins, Boxcars, Ships and Silos. Its use will aid in protecting Feed Grains, Poultry Feed, Seed, Stored Grains, Wheat, Barley, Buckwheat, Corn, Oats, Rice, Rye, Flax, Pea, Soybean, Peanuts, Popcorn, Cocoa Beans, Sorghum (milo), and Dry Edible Beans.

INSECTO should be dusted lightly, approximately one (1) pound per 1,000 square feet on all interior wall surfaces of clean empty storage areas. Where possible, special attention should be given to dusting cracks, crevices and other areas where insects hide or crawl. Dust using aeration fans, air blowers, air hoses, or other air supply. When using the aeration fans, turn on the fans blowing in, measure out the amount of INSECTO required, pour into the fan as fast as the fan will allow, turn off the fan when you see the dust blowing out the top. After dusting, there is no need to remove the dust or aerate the areas. It is safe to enter the area and the area can be safely filled with grains. It is recommended that the area be left undisturbed for two to three days to eliminate existing infestations before filling. It is desirable to re-dust each time the storage area is emptied.

To control accessible stages of Indian Meal Moth and Angoumois Moth, apply to surface of binned grain at the rate of four (4) pounds per 1,000 square foot. Apply at monthly intervals with the first appearance of moths and continue until early fall. In severe infestations break up webbing with a rake before dusting and make second application within two weeks.

**TREATMENT OF STORED GRAIN:** INSECTO can safely be applied to the grain at the time of storage, at the rate of one (1) to two (2) pounds per ton of grain, to protect it from further damage. Treat grains and seed immediately after harvest. For Grain being harvested in the fall, treat the bottom 10% of grain that goes into each bin at the rate of 1 lb/ton. Then treat every 5<sup>th</sup> load at 1 lb/ton. Treat the top 10% at 1 lb/ton. After the bin is full and level, dust with 4 lbs/1,000 sq ft of surface area as a protective barrier (See Chart Below). Inspect bi-weekly, and treat as required. For long term storage over 1 year, grain should be totally treated at the rate of 1 pound per ton throughout. If facility is such that insects have ready access, those areas should be reinforced with 1 pound per 1,000 sq. ft. In such facilities bi-weekly dusting of tops, aeration ducts, and grain moving equipment should be attended to. When receiving infested grain, treat with 1 to 2 pounds per ton as received, and if in house, turn and treat throughout. For warehouses and buildings dust floors, walls, and ceilings at the rate of 1 lb per 1,000 sq. ft of surface area. Additional placement of INSECTO should be at known points of insect habitation such as cracks, doors, and along wall bases. Use the following chart to calculate the amount of INSECTO to use:

Bin Size	Bin Capacity	Lbs to treat Empty Bin	Lbs for Bottom & Top 2 Ft. Ea.	Lbs for Top Dressing
18x18	4,290 bu.	2	3	1
24x24	10,200	3	4	2
30x30	18,700	4	5	3
36x30	27,300	5	6	4
42x30	34,600	6	7	6
48x27	45,800	6	7	7

Note: A large coffee can (2 1/2 Lbs) holds about 1 pound of INSECTO.

**PRECAUTION:** Apply INSECTO at recommended rate. Excessive rate (application) may reduce grain to a lower grade, have reduced flowability and reduce test weight.

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## DIRECTIONS FOR USE CONTINUED:

**POULTRY HOUSING:** For control of darkling beetles, lesser mealworms, and lice apply INSECTO to litter at a rate of 1-2 pounds per ton and top dress at 4 pounds per 1,000 square feet of surface area, side walls, and other areas within the poultry house. Where extreme infestation and / or high moisture levels exist, such as underneath the feeder lines, apply INSECTO at a rate of up to 75 pounds per 1,000 sq. ft. and reapply if and as required. Where litter depth is greater than 3 inches, apply up to an additional 25 pounds per 1,000 sq. ft. per additional inch of litter. Reapplication of INSECTO after each new poultry batch and / or additional litter material is recommended.

**FOR IN-TRANSIT PROTECTION:** Clean and dust truck beds, boxcars, and ship holds before loading. Thoroughly treat walls and floors and dust lightly after container is loaded.

**PEST CONTROL AROUND THE HOUSE:** Lightly coat the area (16 oz. per 1,000 Sq. Ft.) infested with Ants, Roaches, Fleas, Silver Fish, Lice, Water Bugs, and Moths.

**FOOD AND FEED AREAS:** In areas where food or feed is received, processed (including enclosed processing systems), packed (bottled, boxed, canned, wrapped), transported, stored (including waste), prepared, or served, application is limited to crack and crevice and spot treatment only. All food or feed should be removed or covered before treatment.

Apply sparingly into cracks and crevices using equipment designed to place powder in specific locations. Treat open spaces below floors, above ceilings, within walls, under stairs, underneath and behind equipment or appliances, around pipes, under sinks, in utility closets, around garbage cans, etc.

No individual spot will exceed two (2) square feet. Limit spot treatments to wall or floor surfaces where pests have been seen or where pests are suspected of hiding.

**NON-FOOD, FEED AREA:** Use crack and crevice and spot treatments as described above. Also apply to other interior spaces where pests hide, run or land, such as attics and spaces above suspended ceilings, garages, porches, utility rooms, storage rooms, basements and crawl spaces, cracks in baseboards, moldings and doorframes, corners in closets, cabinets and shelves, windowsills and frames, under and behind furniture and appliances, etc. Work into and apply under carpets, rugs, doormats, couches, and other furniture. Wash bedding for pets and apply dust to dry bedding and surrounding areas. Apply to mattresses and bed frames. Outdoors, apply to window and door frames, covered entrances and porches, and along foundations where dust will remain dry.

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