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

AUG 28 1991

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Bedoukian Research, Inc.
c/o Walt Talarek
1577 Spring Hill Road
Suite 600
Vienna, Virginia 22182-7501

Dear Mr. Talarek:

Subject: Bedoukian OFM Technical Pheromone / Change in Composition
CSF Dated 11/20/90
EPA Registration No. 52991-1

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable subject to the following comments.

1. Submit analyses of 5 separate batches to confirm that the certified limits are as requested. See Guideline Reference Numbers 151-13 and 62-1.

2. Submit a revised manufacturing process that describes the [I]mprovements in routine commercial production of technical pheromone... (P. 3 Product Chemistry; Certification of Ingredient Limits submitted with your letter of 11/20/90.) See Guideline Reference Numbers 151-11 and 61-2. Please explain the degree of variation in the upper and lower Certified Limits for the active components in your technical. Although we have received Robert Maloney's letters of 3/12/91 and 3/18/91, a complete description of the revised manufacturing process must be submitted in such a way as to comply with PR Notice 86-5.

3. Submit a revised Discussion on Formation of Unintentional Ingredients, Guideline Reference Numbers 151-12 and 61-3. In this revised discussion, be sure to explain the large degree of variation in the upper and lower Certified Limits for the impurities in your technical.

Sincerely,

Phil Hutton
Product Manager 18
Insecticide-Rodenticide Branch
Registration Division (H7505C)

2 of 2

FOR MANUFACTURING USE ONLY
FOR USE IN MANUFACTURING OR FORMULATING REGISTERED PESTICIDE PRODUCTS
NOT TO BE USED DIRECTLY FOR TREATMENT OF PESTS

BEDOUKIAN OFM TECHNICAL PHEROMONE

A biochemical pesticide which may be used for mating disruption for control of Oriental fruit moth (*Grapholitha molesta*)

Active Ingredients:

(Z)-8-Dodecen-1-yl Acetate	85.43%
(E)-8-Dodecen-1-yl Acetate	5.51%
(Z)-8-Dodecen-1-ol	0.92%
Inert Materials	8.14%
TOTAL	100.00%

ACCEPTED
with COMMENTS
in EPA Letter Dated:

AUG 28 1991

Under the recent Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.
52911-1

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN OR IN EYES - Avoid contact with skin, eyes or clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. Wash thoroughly with soap and water after handling.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS (and Domestic Animals)

Causes eye irritation. Avoid contact of pheromone with skin, eyes or clothing. In case of contact, immediately flush with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. Do not contaminate water by disposal of wastes.

STORAGE AND DISPOSAL

Storage - Store container in cool place until used. Pesticide Disposal - Do not contaminate water, food or feed by storage or disposal. Wastes resulting from use of this product may be disposed of on-site or at an approved waste disposal facility. Container Disposal - Triple rinse (or equivalent), then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incinerate, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE - General Classification FOR MANUFACTURING USE ONLY

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

BEDOUKIAN OFM TECHNICAL PHEROMONE is a behavior modifying biochemical pesticide (pheromone) which functions by mating disruption. It is to be used in the control of Oriental fruit moths (*Grapholitha molesta*). Prior approval of the formulations by the U.S. Environmental Protection Agency is required. Reseal containers immediately after use, store resealed containers in a refrigerator or freezer. Do not use OFM TECHNICAL PHEROMONE from damaged, punctured or unsealed containers.

WARRANTY AND LIMITATION OF DAMAGES

Bedoukian Research, Inc. warrants that this material conforms to the chemical description on the label. Bedoukian Research, Inc. neither makes, nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, expressed or implied, concerning this material. Bedoukian Research, Inc.'s maximum liability for breach of this warranty shall not exceed the purchase price of this product. Buyer and user acknowledge and assume all risks and liability resulting from the handling, storage and use of this material, whether in accordance with directions or not.

Manufactured By:
Bedoukian Research, Inc.
21 Finance Drive
Danbury, CT 06810-4192
Net Contents: _____

BEST AVAILABLE COPY

EPA Establishment No. 52991-CT-1
EPA Registration No. 52991-1

Lot Number: _____