

NOV 19 1998

RJ Advantage  
c/o Catherine B. Rice  
6526 Fairlawn Drive  
McLean, VA 22101

Subject: Methyl Anthranilate  
ReJeX-iT TP-40  
EPA Registration Number 58035-7  
Application to add fogger use and include master label language  
Your submission dated 10/26/98

Dear Ms. Rice:

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) Make the labeling changes listed below before your release the product for shipment bearing the amended labeling:

☒ a. Delete the Heading "Additional Fogging Hazards" from the Environmental Hazard Section.

☒ b. Move the statement "Do not apply this product in areas where plant toxicity is likely to occur" to the "Use Restrictions" section of the Fogger Use Directions.

(Note: the aquatic invertebrate hazard statement can remain in the environmental hazards section).

Submit five (5) copies of your final product labeling before you release the product for

SYMBOL	shipment.	7511C	7511C	7511C				
SURNAME		Loranger	Kumar	[Signature]				
DATE		11/17/98	11-17-98	11-18-98				

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.

Please note that we have reviewed your arguments to change your environmental hazard statement from "This pesticide is toxic to aquatic invertebrates" to "This pesticide is slightly toxic to aquatic invertebrates" and concluded that your arguments are valid. The record will be amended to reflect this change.

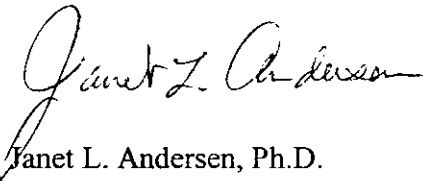
It should be noted that amendments to extend the use of methyl anthranilate to natural, fish-bearing bodies of waters (lakes, ponds, fisheries, rivers, streams, wetlands and other aquatic sites) must be supported by the following:

1. life cycle invertebrate study, (as required in 9/21/95 letter),
2. nontarget plant study Guideline 154-10,
3. efficacy data, and
4. tolerance or exemption from tolerance for residues in fish

(Items 2, 3, and 4 addressed in our 7/16/98 letter).

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

Sincerely,



Janet L. Andersen, Ph.D.  
Director  
Biopesticides and Pollution  
Prevention Division (7511C)

Enclosure

**PRECAUTIONARY STATEMENT**  
**HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**CAUTION:** Avoid contact with eyes or clothing. When handling, wear safety glasses. Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS**

For terrestrial uses, do not apply directly to water, to areas when surface water is present, or to intertidal areas below the mean high water mark.

**Additional Fogging Hazards:** This pesticide is slightly toxic to aquatic invertebrates. Do not apply this product in areas where plant toxicity is likely to occur.

**DIRECTIONS FOR USE**

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

**LANDFILLS AND NON-FISHBEARING BODIES OF WATER**

**USE RESTRICTIONS:** This product may be used to repel starlings, brown-headed cowbirds, ring-billed gulls, Canada geese, and mallards from landfills; non-fishbearing bodies of water (tailing ponds, commercial or industrial water impoundments); and temporary pools of standing water located at or near airports.

**[New York only - This product may only be used on landfills; non-fishbearing bodies of water and temporary pools of standing water on paved areas or construction sites at or near airports.]**

**APPLICATION DIRECTIONS:**

**Non-fishbearing bodies of water** (tailing ponds, commercial or industrial water impoundments): Apply ReJeX-IT® TP-40 at a rate of 20 lbs per acre (8 lbs a.i. per acre) of water surface at 3-4 week intervals. Adjust timing of subsequent applications as required by bird activity and anticipated seasonal migrations. Best applied by spray equipment directly without further dilution.

**Landfills:** Apply ReJeX-IT® TP-40 at a rate of 20 lbs per acre (8 lbs a.i. per acre) directly to the active face as soon as the birds start to arrive. Repeat application as long as birds persists.

**MASTER LABEL**

This master label bears directions for both 1) landfills and non-fishbearing bodies of water and 2) fogging use with various environmental hazards, application directions, and dilution directions specific to use pattern.

**ReJeX-IT® TP-40**  
**Bird Repellent**



**ACTIVE INGREDIENT:**

Methyl Anthranilate(MA), methyl 2-aminobenzoate ..... 40.0 %  
**INERT INGREDIENTS** ..... 60.0 %

**TOTAL**

100.0 %

This product contains 3.16 pounds of Methyl Anthranilate per gallon of product.

ReJeX-IT® TP-40 has been formulated from Food Grade ingredients with an active ingredient that exceeds US Food Chemical Codex (FCC) specifications.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

NOV 19 1998

See Left Panel for additional information.

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

Manufactured for: **58035-7**

**RJ Advantage, Inc.**

501 Murray Road, Cincinnati, Ohio 45217

EPA EST. No. 71638-OH-001 EPA Reg. No.: 58035-7

NET CONTENT: 5 gal

NET WEIGHT: 40 lb

**STORAGE & DISPOSAL**

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

**STORAGE:** Store only in original container, in a dry place inaccessible to children, pets and domestic animals. Store apart from pesticides, fertilizers, food or feed that may cause cross-contamination from odor. Keep container closed when not in use.

**REPELLENT DISPOSAL:** Avian Aversion Agent, or rinse water that cannot be used according to label instructions must be disposed of according to Federal or approved State procedures. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse. The offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved by State and local authorities.

**WARRANTY STATEMENT**

**NOTICE:** The manufacturer warrants that this product conforms to the chemical description on its label. When used in accordance with label directions under normal conditions, this product is fit for its intended purpose. Since timing, method of application, weather and ground conditions, mixture with other chemicals, and other factors affecting the use of this product are beyond our control, no warranty is given concerning the use of this product contrary to label directions, or under conditions which are abnormal or not reasonably foreseeable. The buyer and/or user assumes all risks of any such use.

3/4

## FOGGING

**USE RESTRICTIONS:** This product may be used in area applications to repel nuisance birds from 1) electrical substations and structures; 2) buildings and structures that are not in/on or adjacent to natural or fish-bearing bodies of water. Use caution when there are risks of direct exposure to humans, pets, domestic animals, or nontarget wildlife. Use caution when there are risks of discoloration of plants, painted structures, or other valuable property. Do not smoke while applying this product.

**APPLICATION DIRECTION:** Apply this formulation undiluted by use of thermal or mechanical fog/smoke generators that can deliver particles within the aerosol size range (below 30 microns). Birds must be exposed to airborne TP-40 if it is to achieve lasting results.

Withhold treatment until conditions favoring successful use arise. TP-40 should be applied when birds have settled down in the roosting areas.

Apply undiluted TP-40 at rates of 1 to 4 ounces per 10,000 cubic feet of space to be treated. Hold fog generator's applicator at least 5 feet from objects to be fogged. Repeat treatment as necessary to achieve desired results. Several treatments, 1 to 4 days apart, may be needed.

Submitted 10/26/98