

P.M 14

58035-9

¹⁰⁴³
58035-9

S-494301 345
18

S-497441 305

(cherries not added)
to this label) ³⁷

S-500573 300

S-500574 18
301
18

February 16, 1996

RJ Advantage, Inc.
c/o ERM Program Management Company
7926 Jones Branch Drive
McLean, VA 22102

Attention: Catherine R. Shea

Subject: ReJeX-iT AG-36 and ReJeX-iT TP-40
EPA Registration Nos. 58035-9 and 58035-7
Your submissions of January 15, February 1, and February
8, 1996.

We have received and placed in our files a copy of the letter sent to Mr. Gary Sprock of California's Department of Pesticide Regulations regarding the dermal irritation test for EPA Reg. No. 58035-7. There appears to be an issue about the proper toxicity category. Originally, EPA classified this test as being in Category IV. Now California believes that it should be in Category III, and EPA and the state are attempting to resolve their differences in opinion.

In addition, there was also a question about the toxicity category of the acute dermal tests for all Methyl Anthranilate products. Originally, EPA had classified all acute dermal studies as Category III, because the EPA guidelines indicated that the limit test should be run at 2000 mg/kg. Later, the toxicologist changed the classification to Category IV, because there were no deaths or toxic effects reported in the tests. Subsequently, I was told verbally that this change was in error.

Because the soon-to-be-published, revised 40 CFR 158 might contain language affecting this issue, I have not requested that you to address this issue as yet. Do you know if California currently classifies an acute toxicity study, in which no deaths are reported at the limit dose, to be in Category III or IV? This might be an appropriate time to resolve this issue. If they consider such studies to be in Category III, then EPA and California should notify registrants that limit tests should be run at 5000 mg/kg, not 2000 mg/kg. Otherwise, many products will be overlabeled and, therefore, will appear to be more toxic than they actually are.

The Agency has determined that the Confidential Statement of Formula (CSF), dated February 7, 1996, which was submitted with the above amendment in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. We have added DM Technologies to your

list of producers. A copy of this CSF has been placed in our file for this product. All previous versions are obsolete.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes and submit one (1) copy to us before your ship product:

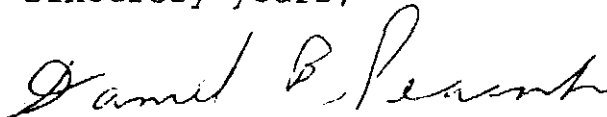
1. Check with your supplier to see if your sticker exceeds FCC specifications.
2. The LESCO name and address is optional.

The reduced rates are acceptable at present. If the data currently under review do not support these rates, you will have one (1) to submit acceptable data.

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.

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

Sincerely yours,



Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

Enclosures: 1. Stamped Label
2. A-79 Enclosure

cc: Tina Levine (7505W)

Peacock:8:A:58035-9.FEB:305-5407/-6600:2/16/96

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS

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 where surface water is present, or to intertidal areas below the mean high water mark.

Do not apply this product or allow it to drift to blooming crops or weeds, if bees are visiting the area.

DIRECTIONS FOR USE

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

USE RESTRICTIONS: This product may be used to repel Canada geese from golf courses and other turf areas. This product must be applied using appropriate spray equipment, such as pump sprayer or a power-blast sprayer. Do not apply when grass is wet or rain is expected.

DILUTION DIRECTIONS: Shake or stir ReJeX-IT® AG-36 container well prior to diluting. Mix ReJeX-IT® AG-36 with water at a ratio of 1 part product to 3 parts water. For example, mix 1 quart of product with 3 quarts of water to make 1 gallon of spray mixture. Mix product outside or in ventilated area.

APPLICATION DIRECTIONS: Apply at a rate of 20 lbs AG-36 (10 gallons of spray mixture, 2.9 lbs a.i.) per acre of turf area. Spray evenly on area to be protected to provide thorough coverage and allow material to dry before permitting human activity on treated area. Repeat in 4 days or as warranted by Canada goose activity. Do not mow the treated area for several days after application.

ReJeX-IT® AG-36

ACTIVE INGREDIENT:

Methyl Anthranilate (MA), methyl 2-aminobenzoate.. 14.5%

INERT INGREDIENTS 85.5%

TOTAL 100.0%

ReJeX-IT® AG-36 has been formulated from Food Grade ingredients that exceed U.S. Food Chemical Codex (FCC) specifications.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

See Left Panel for additional precautionary statements.

Manufactured for

RJ Advantage, Inc.

A Subsidiary of PMC Specialties Group, INC.
501 Murray Road, Cincinnati, Ohio 45217

EPA REG. No. 58035-9

Packaged and Sold by

LESCO, INC.

20005 Lake Rd.
Rocky River, OH 44116-1545

EPA EST. No. 10404-OH-02

NET CONTENT: 2.5 gallon
Product # 023384

STORAGE

STORAGE: Store only in inaccessible to children, apart from pesticides, for cross-contamination from

Store above 32 Deg. F. use.

REPELLENT DISPOSAL: water that cannot be used be disposed of according to procedures. Wastes resulting be disposed of on site facility.

CONTAINER DISPOSAL: recycling or reconditioning sanitary landfill, or by other local authorities.

ACC
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in EPA I

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Under the Fe
Fungicide, and
as intended.
registered und
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WARRANTY

NOTICE: The manufacturer wa
chemical description on its la
directions under normal condi
purpose. Since timing, meth
conditions, mixture with other ch
of this product are beyond our c
use of this product contrary to lab
abnormal or not reasonably forese
risks of any such use.

BEST AVAILABLE COPY