

PM 14

58035-9

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December 16, 1996

RJ Advantage, Inc.
c/o 6526 Fairlawn Drive
McLean, VA 22101

Attention: Ms Cathy Shea

Subject: ReJeX-iT AG-36
EPA Registration No. 58035-9
Your submissions of September 15, October 17, 1995,
January 11, April 29, and July 11, 1996

We have reviewed the above five submissions and have the following comments.

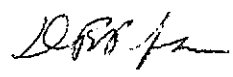
1. The labels submitted on September 15, 1995, and January 11, 1996, were not reviewed in detail. These labels were superseded in all cases by the label submitted on February 7, 1996, and were seemingly inappropriate in two cases to the Confidential Statement of Formula (CSF) also submitted on February 7, 1996. The label and CSF submitted on February 7, 1996, were accepted on February 16, 1996.
2. As we have been informed by your consultant ERM Program Management Company that you no longer seek to add claims for protecting ripening blueberries to this product's label, we have not reviewed for 58035-9 the blueberry efficacy study report (MRID# 438855-01) submitted on January 11, 1996. We will consider that study for your pending product 58035-RG.
3. Your submission of October 17, 1995, included a report (MRID# 438183-01) of laboratory tests of diluted AG-36 mixed with 4 candidate stickers for adherence to plastic food wrapping covering plate glass. The results of this trial were described only qualitatively. Apparently nothing other than light rubbing was used to challenge the adherence of the mixtures. The results reported do not adequately support extrapolations to the effect that the sticker selected will perform well under field conditions. The results also fail to indicate that the addition of a spreader/sticker to the formulation of 58035-9 justifies the 75-79% reduction in treatment rates on the label that was accepted on February 16, 1996, as compared to the label accepted on December 19, 1994.

The effectiveness of the new formulation in keeping Canada geese off of turf must be established through appropriately designed field studies. Among other things, the studies must assess the efficacy of at least three different application rates and must assess turf treated at these rates for evidence of phytotoxicity. We suggest that you submit a protocol for our review prior to beginning such studies. You will have 18 months from the date of this letter to develop and submit the required data. Note that there is a strong public health component to the claim of repelling Canada geese from turf.

- 4. The "AG-36" portion of the name of this product remains inappropriate as it is misleading with respect to the product's composition.
- 5. Your labels of April 29, 1996, were not reviewed because they were superseded by those submitted on July 11, 1996.
- 6. Labeling Submitted on July 11, 1996

The labeling submitted with your July 11, 1996, letter, in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

Sincerely yours,



William W. Jacobs, PhD
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

Enclosure: Stamped label

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PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: 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.

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 a 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 a ventilated area.

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

ReJeX-IT® AG-36

DEC 16 1996

ACTIVE INGREDIENT:

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

INERT INGREDIENTS 85.5%

TOTAL 100%

This product contains 1.23 pounds of Methyl Anthranilate per gallon of product

ReJeX-IT® AG-36 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

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 EST. No. 68607-OH-001 EPA REG. No. 58035-9

NET WEIGHT: 40 lb - NET CONTENT: 4.7 gallons

STORAGE & 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.

Store above 32 Deg. F. Keep container closed when not in use.

REPELLENT DISPOSAL: Product 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. Then, offer for recycling or reconditioning; or puncture and dispose 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.

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