

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 22, 2005

Dr. T's Nature Products Company, Inc.
P.O. Box 682
Pelham, GA 31779

5-773429 300/18

Attention: Mr. Melinda K. Knight

Subject: Dr. T's Rabbit, Squirrel, Bat & Bird Repellent
EPA Reg. No. 58630-2
Your amended application of June 1, 2004
Our letter of December 16, 2004

Purpose The purpose of this submission is to revise the labeling for this product according to PR Notice 2001-1 ("First Aid" text) and PR Notice 2001-6 ("Disposal" text).

Label The labeling submitted with the above letter, under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.

1. Your proposed changes to your "First Aid" text are difficult to read. Please follow Enclosure 1 for a clearer presentation.
2. Your revised "**STORAGE AND DISPOSAL**" text needs the heading centered over the text:

STORAGE AND DISPOSAL

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

Existing stocks Stocks of product with existing labels may be used for eighteen (18) months.

Consequence for non-compliance 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 constitutes acceptance of these conditions.

Questions If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure 1. Stamped label
2. Minimum Type Sizes for Final Printed Labels

Letter location Dan Peacock, USB Flash Drive 1,E:\1-7-2005 Backup\Dan's Office Work\A Flash Drive 1\Naphthalene\58630-2, revised label, 3-4-2005.wpd

FIRST AID	
Have label with you when obtaining treatment advice.	
If swallowed	<ul style="list-style-type: none"> •Call a poison control center, doctor, or 1-800-222-1222 (toll free number optional) immediately for treatment advice. •Have person sip a glass of water if able to swallow. •Do not induce vomiting unless told to do so by the poison control center or doctor.
If on skin or clothing	<ul style="list-style-type: none"> •Take off contaminated clothing. •Rinse skin immediately with plenty of water for 15-20 minutes. •Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.
If inhaled	<ul style="list-style-type: none"> •Move person to fresh air. •If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. •Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.
If in eyes	<ul style="list-style-type: none"> •Hold eye open and rinse slowly and gently with water for 15-20 minutes. •Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. •Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice.
NOTE TO PHYSICIAN	
If breathing is difficult, give oxygen.	

List of Organizations and Their First Aid Toll-Free Numbers	
Organization	First Aid Toll-Free Number
National Association of Poison Control Centers	1-800-222-1222
National Pesticide Information Center (NPIC)	1-800-858-7378
1-	

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Dr. T's Rabbit, Squirrel, Bat & Bird Repellent

For Repelling Rabbits, Tree Squirrels, Bats and Birds

Active Ingredient:	
Naphthalene.....	99.95%
Inert Ingredient:.....	0.05%
Total:.....	100.00%

Keep out of reach of children

WARNING

See back Panel for additional precautionary statements

EPA Reg. No. 58630-2

EPA Est. No. 58630-GA-1

Dr. T's Nature Products Company, Inc. **ACCEPTED**
PO Box 682 **with COMMENTS**
Pelham, GA 31779 **in EPA Letter Dated:**
MAR 22 2005

Net Weight: 1 LB.

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

58630-2

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DIRECTIONS FOR USE

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

FOR CONTROL OF RABBITS AROUND ORNAMENTAL PLANTS

Use restrictions: To reduce the frequency of visits by rabbits to ornamental plants. For outdoor use only.

APPLICATION DIRECTIONS: At first sign of growth of roses, spring bulbs, flowers or other plants to be protected, apply one or more inch-wide bands of product around the plants. Do not apply product directly to foliage or stems. Hot weather and wind will necessitate more frequent applications.

FOR CONTROL OF TREE SQUIRRELS, BATS, STARLINGS, PIGEONS, AND HOUSE SPARROWS IN ATTICS AND WALL VOIDS:

Use Restrictions: To repel tree squirrels, bats, starlings, pigeons, and house sparrows from attics and wall voids. For indoor use only. **DO NOT APPLY THE PRODUCT DIRECTLY IN THE ATTIC OR WALL VOID.**

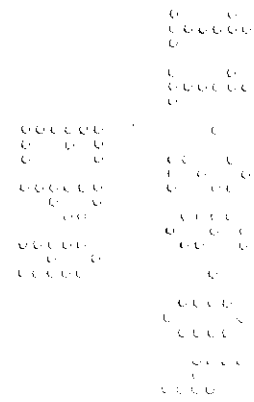
Pre-Application Directions: Calculate the total number of cubic feet to be treated. Divide by 400 cu. ft. to determine the number of pounds of product needed.

Application Directions: Apply the product at the rate of 1 pound per 400 cu. ft. Place smaller amounts (2 to 4 ounces) in a mesh bag, cheese cloth, panty hose or small, opened topped cardboard container so that product can be easily removed if odor becomes too strong. Animals will depart from treated areas shortly.

Post-Application Directions: Close all openings through which animals gain access to attic and wall voids (such as small crevices, around eaves, rafters, and around dormers) with strips of wood, metal or steel wool.

NOTICE:

Buyer assumes all risks of use, storage, and handling of this material not in strict accordance with label directions.



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING:

May be fatal if inhaled. Harmful if swallowed. Avoid breathing vapors or dust. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish. Do not apply directly to water.

First Aid

- If inhaled: Move person to fresh air.
..... If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
..... Call a poison control center or doctor for further treatment advice.
- If on skin or clothing: Take off contaminated clothing.
..... Rinse skin immediately with plenty of water for 15-20 minutes.
..... Call a poison control center or doctor for treatment advice.
- If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes.
..... Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
..... Call a poison control center or doctor for treatment advice.
- If swallowed: Call poison control center or doctor immediately for treatment advice.
..... Have person sip a glass of water if able to swallow.
..... Do not induce vomiting unless told to do so by the poison control center or doctor.
..... Do not give anything by mouth to an unconscious person.

Have the product container with you when calling a poison control center or doctor, or going for treatment.

Note to physician: If breathing is difficult, give oxygen.

STORAGE: Store only in original container, in a cool, dry place, inaccessible to children and pets.

DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available.
If partly filled: Call your local solid waste agency or 1-800-CLEANUP (1-800-253-2687) for disposal instructions. Never place unused product down any indoor or outdoor drain.