

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

CERTIFIED MAIL (#955444)

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

Rudducks USA, Inc. 303 Fifth Avenue, Suite 1904 New York, NY 10016

5387320

Gentlemen:

Subject: Get Off My Garden

EPA Registration No. 59578-1 Your letter of October 9, 1990 Our letter of November 20, 1990

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy is enclosed for your records.

Prior to your next printing, submit five (5) copies of revised, draft labeling with the changes indicated below. Indicate in your cover letter when you would begin using the revised labeling, not after January 1, 1992.

1) Change your product name to clarify that the product is for use on garden perimeters, not for direct application on the plants themselves. The following would be acceptable:

GET OFF MY GARDEN PERIMETER CRYSTALS

The words "PERIMETER CRYSTALS" must at least be of the same type size as "MY".

2) In your December 7, 1990, telephone conversation with Mr. Daniel Peacock, you indicated the existence of both efficacy data and acute toxicity data. Within 90 days of receipt of this letter, submit these studies to the Agency for review in the format outlined in PR Notice 86-5. These data will provide us with a clearer perspective of the issues raised in our November 20, 1990, letter.

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.

Sincerely yours.

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Marilyn A. Mautz Acting Product Manager 16 Insecticide-Rodenticide Branch Registration Division (H-7504C)

Enclosures: 1) Stamped label

MAM:dbp:CM2:RM265:557-4407:12/10/90:Peacock Disk 51(5)

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