UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

CCJ 1.8 1630

SCM Metal Products, Inc. 11000 Cedar Avenue, Suite 100 Cleveland, OH 44106

Attention: Harry D. Ambs

Gentlemen:

Subject: Cuprous Oxide-Arade AA

EPA Registration No. 63005-1

Your Submission Dated Pebruary 12, 1990

EPA Received Date Pebruary 15, 1990

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below.

1. The ingredient statement must declare the name and percentage of each active ingredient and the total percentage of all inert ingredients. Therefore, the ingredient statement in your label should declare:

The statement "Copper" should be placed below the angredient statement and should be similar to:

Copper as metal ____t

2. Special instructions must be given for the disposal of the pesticide and its container. These instructions must be grouped under the heading "Storage and Disposal," and should include the statement "Do not contaminate water, food, or feed by storage or disposal.

For proper disposal instructions, please consult PR Notice 83-3.

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CONCURRENCES			
SYMBOL #7505C			
SURNAME MILLOW			1
DATE 10/18/90			

EPA Form 1320(1 (17-70)

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- 3. Your product can only have one signal word. The correct signal word for your product is "Caution." You must make the change on the label.
- 4. Prease make all the necessary label changes according to the Label Improvement Program (LIP).

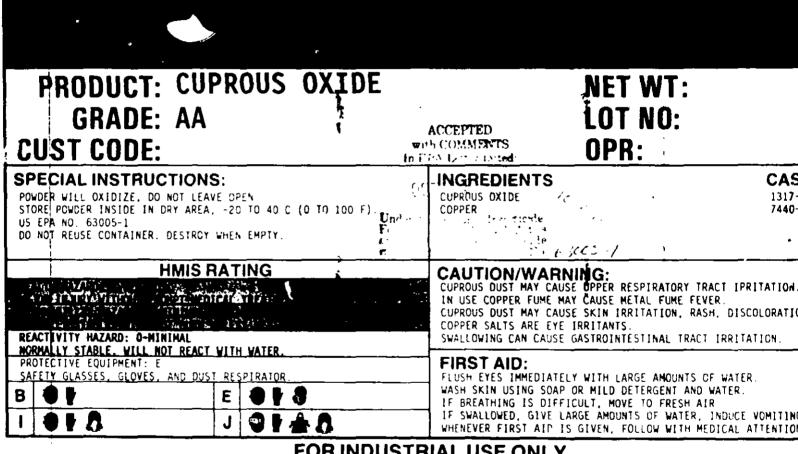
Should you have any further questions, please contact Veronica Dutch at (702) 557-7404.

Sincerely yours,

John H. Lee Product Manager (31)

Antimicrobial Program Branch Registration Division (H7505C)

PM 31 63005-1



FOR INDUSTRIAL USE ONLY SEE MSDS BEFORE USE