

PM 04

63123-1

9/25/97

PS 1/3

5-519807

306/17

SEP 25 1997

Bottomland Naturals, Inc.
P.O. Box 1241
Newport, AK 72112

Attention: Mr. Doug Fletcher

Subject: Varpel Rope
EPA File Symbol 63123-1
Your submissions of December 31, 1996 and February 20, 1997

We have reviewed the above two submissions and have the following comments:

A. Change in Packaging (12/31/96 submission)

From the description of your new package provided with your "Notification of change in packaging" dated December 31, 1996, we cannot determine whether this cardboard box would effectively retain product odors initially or upon attempts at resealing. Please provide us an empty version of the cardboard-box container that are using (or intend to use) for this product. Please also include any liner(s) that may be used along with the box.

B. Change in Labeling (2/20/97 submission)

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 you ship your product:

1. When you print labels, left-justify the subheading "APPLICATION DIRECTIONS" and follow it with a colon (:) so that this subheading is organizationally parallel to the other subheading ("USE RESTRICTIONS:").

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,

DBP

Dan Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

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

Peacock Disk 14:A:\PDB\63123-1:305-5407,-6600:9/25/97

HAZARDS TO HUMANS AND
DOMESTIC ANIMALS

WARNING

CAUSES SUBSTANTIAL BUT TEMPORARY EYE INJURY. CAUSES IRRITATION TO EYES, SKIN, AND RESPIRATORY TRACT. HARMFUL IF SWALLOWED. DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING. AVOID BREATHING DUST OR VAPORS. USE WITH ADEQUATE VENTILATION. WASH THOROUGHLY WITH SOAP AND WATER AFTER HANDLING.

PHYSICAL OR CHEMICAL HAZARDS

FLAMMABLE. DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME. FLASHPOINT MINIMUM OF 150° F (66°C) COMBUSTIBLE VAPOR AND LIQUID. IN CASE OF FIRE, EXTINGUISH WITH WATER SPRAY, FOAM, CARBON DIOXIDE, DRY CHEMICAL OR ANY CLASS B EXTINGUISHING AGENT.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES, IMMEDIATELY FLUSH WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES. GET MEDICAL ATTENTION. REMOVE MATERIAL FROM SKIN AND CLOTHING.

IF ON SKIN, IMMEDIATELY FLUSH WITH PLENTY OF WATER. REMOVE CONTAMINATED CLOTHING. WASH CLOTHING BEFORE REUSE.

IF INHALED, REMOVE TO FRESH AIR. IF NOT BREATHING GIVE ARTIFICIAL RESPIRATION. IF BREATHING IS DIFFICULT, GIVE OXYGEN. GET MEDICAL ATTENTION.

IF SWALLOWED, DO NOT INDUCE VOMITING UNLESS DIRECTED BY MEDICAL PERSONNEL. GET MEDICAL ATTENTION. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

STORAGE & DISPOSAL

DO NOT CONTAMINATE WATER, FOOD, OR FEED BY STORAGE OR DISPOSAL OF PRODUCT OR CONTAINER.

STORAGE:

STORE IN A COOL DRY PLACE.
MATERIAL WILL MELT AT 127° F.
STORE IN ORIGINAL CONTAINER.

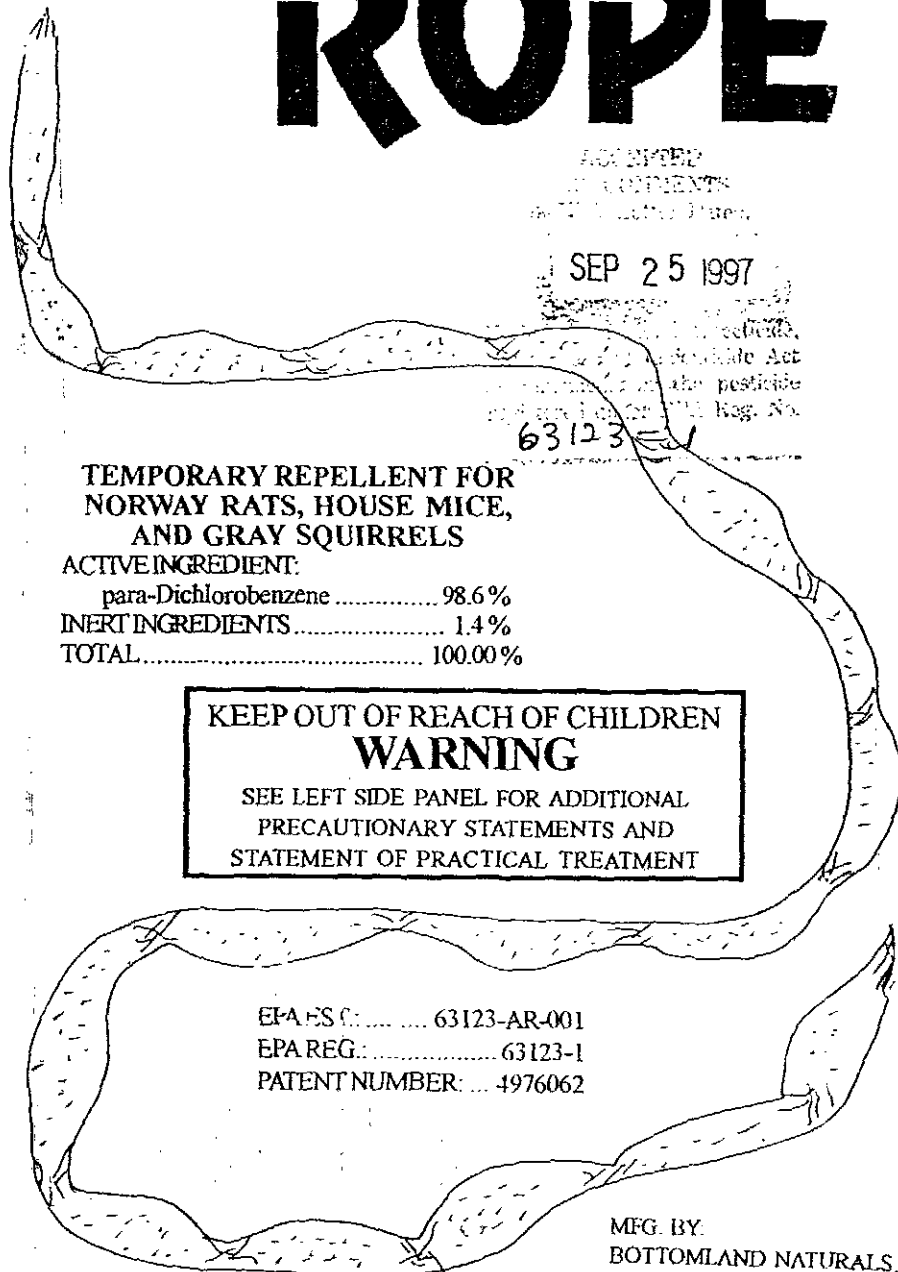
SPILL AND LEAKAGE:

KEEP PEOPLE AWAY.
SHUT OFF OR EXTINGUISH ALL SOURCES OF IGNITION.
AVOID BREATHING VAPORS.
SWEEP UP OR SHOVEL INTO CLEAN METAL CONTAINERS.
DISPOSE OF PESTICIDE AND CONTAINER IN ACCORDANCE WITH INSTRUCTION PROVIDED UNDER DISPOSAL BELOW.

PRODUCT DISPOSAL:

PESTICIDE WASTES ARE TOXIC. IMPROPER DISPOSAL OF EXCESS PESTICIDE, SPRAY MIXTURE, OR RINSATE IS A VIOLATION OF FEDERAL LAW. IF THESE WASTES CANNOT BE

VARPEL ROPE®



RECEIVED
SEP 25 1997

**TEMPORARY REPELLENT FOR
NORWAY RATS, HOUSE MICE,
AND GRAY SQUIRRELS**

ACTIVE INGREDIENT:
para-Dichlorobenzene 98.6%
INERT INGREDIENTS 1.4%
TOTAL 100.00%

**KEEP OUT OF REACH OF CHILDREN
WARNING**
SEE LEFT SIDE PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS AND
STATEMENT OF PRACTICAL TREATMENT

EPA REG. NO. 63123-AR-001
EPA REG. NO. 63123-1
PATENT NUMBER: 4976062

MEG. BY:
BOTTOMLAND NATURALS, INC.
P.O. BOX 1241
NEWPORT, ARKANSAS 72112

NET CONTENTS: 9.62 LBS. (4.36 KG.)

STORAGE & DISPOSAL (Cont)

DISPOSED OF BY USE ACCORDANCE WITH LABEL. CONTACT YOUR STATE PESTICIDE CONTROL AGENCY, OR FEDERAL AGENCY REPRESENTATIVE AT THE NEAREST OFFICE FOR GUIDANCE.
CONTAINER DISPOSAL:
DO NOT REUSE CONTAINER. REUSE IS NOT ALLOWED BY STATE AND LOCAL LAWS. IF BURNED, STAY OUT OF SMOKE.

DIRECTIONS

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

USE RESTRICTIONS: FOR VARPEL ROPE® ONLY AS DIRECTED

Varpel Rope® may be used to temporarily repel Norway rats (*Rattus norvegicus*) and house mice (*Mus musculus*) from warehouses, storerooms, garages, utility areas. Varpel Rope® may also be used to repel gray squirrels (*Sciurus carolinensis*) from attics.

Do not apply this product in gardens, do not use on grain used for seed. Make sure that the product is sealed off from living space so that permeability is minimal.

Testing of this product has indicated that it is effective for commensal rodents and squirrels, but results may vary due to individual application conditions. Varpel Rope® keeps squirrels from attics constructed and/or not constructed to prevent sufficient build-up of product.

APPLICATION

Rats and Mice: Using gloved hands, apply product to be protected within the rope and then close the rope should be placed on the floor 12 to 18 inches from its nearest point. Varpel Rope® should be placed in the most active (dark to dawn) and remove the rope. Activity typically keeps rodents in hiding. Reseal container when not in use.

Squirrels: Locate the openings that squirrels use to enter the attic. Using gloved hands, cut off 3-5 inch section of Varpel Rope® inside each access point of the package contents throughout the package. Varpel Rope® per 5,000 cubic feet of attic space (X 1/2 Height). More than one package of Varpel Rope® may be used. Once you are sure that all squirrels have been sealed off at access points using conventional sealants or other permanent sealants appropriate for use, retrieve Varpel Rope® and reseal container.

NOTICE: Buyer assumes all risks of use of this product if not in strict accordance with its label directions.