

19 October 1994

Dana L Turner
R2 B192
Diana, Texas 75640

Environmental Protection Agency
Product Manager 18
Pesticide's Registration Division
401 M. St.
Washington, D.C. 20460

Dear Mr. Hutton and/or Dr. Chin:

RE: Notification of modification of label; EPA Product
63709-1 - active ingredients: 14.2% turpentine and .2
% ammonia/85.6% inert ingredients.

Pursuant to 40 CFR § 152.46 **Modifications to registration not requiring amended applications**, I hereby formally notify the Agency of my intent to modify the registration of my federally-registered product.

Consistent with §§ 156 and 152.46(a)(1), the following revision of label language involving no change in the statement of ingredients, precautionary statements or direction for use, is submitted:

1. Under "Directions for Use", strike the phrase "but will not increase risk".

2. Under "Hazards to Humans and Domestic Animals", addition: **May be "[h]armful if absorbed through the skin"**.

3. Under "Environmental Hazards", Do not pour into lakes, ponds, etc., or use these sources of water to clean equipment or dispose of wastes" replacing the precautionary language used in the label of the product "aaNKILL 44".

The label of the product "aaNKILL 44" shall not reflect this revision of language labeling until existing stocks of labels are depleted.

ADDITIONAL BRAND NAME

Pursuant to 40 CFR § 152.46(a)(2), I hereby notify the agency of additional brand names; to wit:

BIOGUARDIAN FIRE ANT KILLER

MOTHER EARTH NON-SYNTHETIC FIRE ANT KILLER

Mock-up of the labels shall soon follow.

2043

I would also appreciate if you would send me an application for amended registration, as I would like to label a product for greenhouse use. As EPA has waived data requirements for domestic outdoor use, and the data requirements are essentially identical (green house use is not quite as stringent), I would ask that EPA, pursuant to 40 CFR § 152.44(b)(1), waive the requirement for submission of an application for amended registration as risk factor shall not be compromised.

The proposed revision concerns the tentative name "GreenHouse Gone" - 'Potted Plant Dip for Rapid Fire Ant Deinfestation'. The "Directions for use" shall read: In a large container such as a washtub, fill with clean, cool water to level of or higher than level of pots to be dipped. Mix 1 oz. "GreenHouse Gone" per gallon of water. For best results chill water with ice. Submerge pots for 15-20 minutes - drain and remove to cool shaded area. DO NOT PLACE PLANTS IN WARM OR SUNNY AREAS FOR 8 HOURS. NOT REGISTERED FOR USE ON FOOD PLANTS.

I enclose 5 copies of my final printed label of "aaNKILL 44". Thank you.

Enclosure

Sincerely,


Dana L. Turner

NOTICE

It is a violation of federal law to use this product in a manner inconsistent with this label. All directions and precautions must be strictly followed. Label must not be removed from container and must be with user at all times.

DIRECTIONS FOR USE

(General Classification)

SHAKE WELL

Mix 3/4-1 oz. aaNKILL 44 per gallon of clean water; the colder, the better. Rapidly pour activated water into cavity (mound) until full. Average mound requires 2-4 gallons of activated water. Best/fastest results under cool or cloudy conditions. Warm temperatures/hot sun will severely limit effectiveness but will not increase risk. Numerous applications required in or near obstructions, driveways, curbs, etc. NOT FOR USE IN GARDENS OR ON FOOD CROPS!

Active ingredients: 14.2% Turpentine
.2% Ammonia

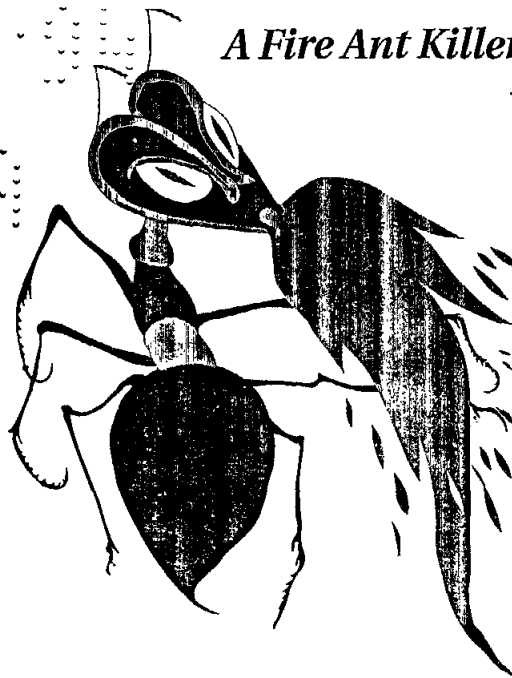
Inert Ingredients: 85.6%

EPA Registration No.: 63709-1

EPA Establishment No.: 63709

aaNKILL 44™ Water Activator

A Fire Ant Killer



PRECAUTIONARY STATEMENTS

CAUTION!

Store and Keep Out Of Children's Reach

Hazards to Humans & Domestic Animals: Harmful if absorbed through the skin. Avoid contact with skin, eyes and clothing. Always wash thoroughly with soap and water after using this product. CONTAINS FLAMMABLE OILS. Keep away from heat and flames!

Statement of Practical Treatment:

In case of contact with the undiluted product, immediately flush eyes, skin or clothing with plenty of water. Get medical attention if irritation persists.

Environmental Hazards:

Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

Storage and Disposal:

Store in original container. Do not reuse container! Wrap empty container in newspaper and dispose of according to local regulations.

1 QUART

Net Contents:

DLT Laboratories
R2 B192
Diana, Texas 75640

Lot/
Batch _____

363