BEST AVAILABLE COPY

ATTACHMENT IS APPLICABLE			
SIGNATURE OF APPROVING OFFICIAL	I That	1 5- Hyl	- , ,

EPA Form 8570-6 (Rev. 5-76)

المراجع بأشته فيالسيا وتفاقيه بويكر ويريانو

PREVIOUS EDITION MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

c. Your product contains 90% silicon dioxide. This is the insecticidally active component of your product. Thus an ingredient statement as indicated below must appear on the <u>front</u> panel of the label:

ACTIVE INGREDIENT

Diatomaceous Earth..... 90.0%

INERT INGREDIENT(S)......10.0%

TOTAL..... 100.0%

In this regard delete the phrases "Diatomaceous Earth 100%" and "Active Ingredients, Diatomaceous Earth 100%".

- d. all Delete phrases referencing "Natural"and "Nature...", phrases implying the safety of the pesticide or its ingredients, (i.e., non polluting, safe in the environment, biodegradable, manufactured by God, mutations, Natures no Insecticide...etc.) from the label. implied claims such as these are not acceptable on pesticide labeling.
- e. Change the heading Health Hazard Data to:

Precautionary Statements Hazards to Hazards and Domestic Animals

- f. The signal word **CAUTION** must appear before the precautionary statements.
- g. Add the signal word CAUTION and the move the precautionary statement KEEP OUT OF REACH OF CHILDREN on the front panel of the label.
- h. The heading "Suggested Direction for TRU-GEN WHITE GOLD" must be changed to Directions For Use followed by the misuse statement "It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
- i. The section headed GRAIN STORAGE must be revised to reflect rates of application of the product and types of grain and pests effected. Items 1 through 6 are unacceptable and must be deleted since they are false or misleading statements concerning the effectiveness of this product as a pesticide. We

suggest the following statements:

T.G.W.G. is an effective insecticide for killing exposed insects Rice Weevils, Granary Weevils, Angoumois Grain Moths. Mediterranean Flour Moths, Indian Meal Moths, Red Flour Beetles, and Tribolium in Empty Grain Bins, Boxcars, Ships and Silos. Its use will aid in protecting Feed Grains, Seeds. Stored Grains Wheat, Barley, Buckwheat, Corn, Oats, Rice, Rye, Flax, Pea, Soybean, and Sorghum (milo).

T.G.W.G. should be dusted lightly approximately one (1) pound per 1,000 square feet on all interior wall surfaces of empty storage areas. Where possible special attention should be given to dusting cracks, crevices and other areas where insects hide or crawl. After dusting there is no need to remove the dust or aerate the areas. It is recommended that the area be left undisturbed for two to three days to eliminate existing infestations before filing. It is desirable to redust each time the storage area is emptied.

T.G.W.G. can be applied to the grain at the time of storage at the rate of one (1) to two (2) pounds per ton of grain to protect it from further damage. Treat grains and seed immediately after harvest.

CAUTION:

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Apply T.G.W.G. at recommended rate. Excessive rate (application) may reduce grain to a lower grade, have reduced flowability and reduce test weight.

- j. Delete the decal of the flea from the label since the fleas are not addressed as a pest affected by this product.
- k. Revise the direction for ant to read as follows:

"Apply T.G.W.G. along baseboards, entry cracks and crevices and to areas of intensive ant activity such as doors and trailways. Apply T.G.W.G. monthly or as needed."

(Delete outdoor use since this is <u>not</u> a supported use).

- 3. With respect to the product chemistry information submitted and Confidential Statement of Formula we have the following comments:
 - a. Please provide a revised Confidential Statement of Formula (CSF) identifying the upper and lower certified limits based on the pure active and inert ingredients of the product. Note that the lower limit of the active must be the same as the label claim in pure active form. Note that the active ingredient is 90% pure not 100%.

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b. The product chemistry submitted for whis product is incomplete. Please provide the following data to satisfy those outstanding data requirements:

<u>Series 62-2 - Analysis and Certification of Product Ingredients</u>

<u>62-1 - Preliminary Analysis</u>

The Agency requires a preliminary analysis of five batches of diatomaceous earth. All components ≥ 0.1 % must be identified.

62-3 - Analytical Methods to Verify Certified Limits

A complete analytical method to verify active and inert ingredients is required.

<u>Series 63 - Physical and Chemical Characteristics</u>

All applicable Series 63 data is required. If any data are not required for your product, provide an explanation or indicated N/A (not applicable).

For further guidance in understanding these product chemistry data requirement, enclosed is a copy of the Product Chemistry Data Requirement Guideline Sheet. Also enclosed is a sample label for guidance in formatting your label.

4. Submit five copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

Sincerely yours,

George T. LaRocca Product Manager 15 Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosures

DIATOMICEOUS EARTH (AKS) D.E. MOTHER NATURE'S BUG KILLER ACTIVE INCREDIENTS DIATOMACEOUS EARTH 100%

INFORMATION and FACIS

DIATOMACEOUS EARTH is strictly a natural product. It is apporoxamatley 30 million years old. Countless trillions of minute one-celled plants called DIATOMS existed in the oceans and in -land lakes. They construct timy shells about themselves out of the silica they extract from the waters. Proper milling cracks apart the diatom skeleton exposing microscopic silica needles, sharp and hazardous to an insect. Insects have exo-skeletons, their frame is on the outside, the diatom is small and sharp, it will scratch the insect's waxy scal, allowing vital moisture to escape, causing the insect to dehydrate and die.

HEALTH HAZARD DATA

Avoid contact with eyes, if contact occurs immediatly flush with water. Get medical attention if irritation persists. Avoid inhalation of dust. Wear a dust mask when using this product for prolonged period of time.

STORAGE and DISPOSAL 💉

Keep D.E. in a dry place to maintain maximum effectivness.

Do not reuse empty container, wrap the used con-" tainer and put in trash collector.

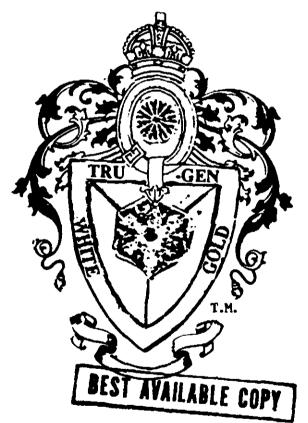
KEEP OUT OF REACH OF CHILDREN.....

WARRANTY

TRU-GEN warrents that this Arizona D.E. at time of sale that: 1- It is for use as stated on label. 2- It is 100% D.E. No other warranty is implied or expressed

TRU - CEN WHITE COLD DIATOMACEOUS EARTH 100% NATURES NATURAL INSECTICIDE

BIODECRADABLE.. SAFE IN THE ENVIRONENT NON POLLUTING



See side panel for directions and precautions

MANUFACTURED by GOD

Distributed by.... TRU-GEN WHITE COLD PO. Box 30792 Tucson, Az. 85751

E.P.A. REG. NO.

NET WEIGHT ... circle.. 10c. - 2 lb. - 51b.-1046EPA Letter Dated: 251b. - 501b 1 ton - 25 ton

AUG 2 1 1990

SUCCESTED DIRECTIONS

ROACHES

APPLY T.G.W.G. insectici bugs) on any area where cracks, baseboards, behi under sink, any other pl becomes wet or removed d should be reapplyed.

ATCC - apply around doc hills, apply into main h ference area of 4 ft, an around the hill. When i ground dries.

CRAIN STORAGE- NATURES 1.. need only 1 applicat no build up of immunity. T.G.W.G. is free from in prevents the development stock goods as cereals... not deteriarate with tim tion to stored grain.6. sects, living and reproc are eliminated when grabecause it totally free infestation.7.. Home sto 1 gal. of grain, beans ODOR FREE COLORLESS...

TRU-GEN WHITE GOLD-DIA WATER DIATOM FROM INLAN

THERE IS A DIFFERENCE

Use D.E. sparingly a li

MUTATION

Under the Federal Inscendedo, Fungicide, and Rodenticide Act as amended, for the pesticide intered under EPA Reg. No. 4387.2