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Mole Med Inc.
P.O. Box 333
Aurora, Indiana 47001

Attention: Mr. Eldon Pickett

Subject: Mole Med
EPA Reg. No. 64439-1
Your two submissions of December 4, 1995
Your submission of January 5, 1996

We have reviewed the three submissions mentioned above and have the following comments.

I. Revised Confidential Statement of Formula (CSF)
(Replacement of Second Ingredient)

You submitted a revised Confidential Statement of Formula (CSF), dated December 4, 1995, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to replace the second ingredient on your current formula with a new ingredient.

This request was not acceptable because we were unable to determine the chemical composition of the ingredient. Request your supplier to provide us with the chemical composition of this ingredient so that we can then determine if the old and new formulas are substantially similar, thereby avoiding the need for replacement acute toxicity tests.

II. Revised Confidential Statement of Formula (CSF)
(Replacement of Second Ingredient)

You submitted a revised Confidential Statement of Formula (CSF), dated December 4, 1995, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to replace the second ingredient on your current formula with a new ingredient.

This request was not acceptable because we were unable to determine the chemical composition of the ingredient. Request your supplier to provide us with the chemical composition of this ingredient so that we can then determine if the old and new formulas are substantially similar, thereby avoiding the need for replacement acute toxicity tests.

III. Revised Labeling (8 oz., 16 oz., and 32 oz sizes)

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 your ship product:

- A. Delete "Environmentally Friendly" because the Agency has no criteria to define such a term. However, the term "very low oral toxicity" would be acceptable.
- B. Change the claim "chases moles away" to "moves moles away" or "repels moles", wherever it occurs.
- C. Retain the "Storage and Disposal" heading to separate this from other sections of your label text.
- D. Change "Practical Statement of Treatment" to "First Aid".
- E. Group all use directions in one place. Do not insert "Storage and Disposal" and "Precaution ry Statements" within the text.
- F. Structure your use directions in a logical, step-wise fashion. The comments below would apply to your 8 oz. size, which would function as your master label. Your 16 oz and 32 oz sizes would be identical except that the "hand-held spray and sprinkler can" directions would not appear on those sizes. Follow this label format:

DIRECTIONS FOR USE

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

USE RESTRICTIONS: For repelling eastern moles from lawns.

LOCATING MOLES: The presence ... presence.

DIRECTIONS FOR HAND-HELD SPRAYER OR SPRINKLING CAN

Mixing Directions (Mix well ... 2500 sq.ft.)

Application Directions

- 1. If the area ... to repeat application.

DIRECTIONS FOR HOSE-END SPRAYER

Mixing Directions

- 1. Shake well ... to allow spray.

Use the table below to determine the amount of Mole-Med needed for the area that you intend to treat.

Amount of Mole-Med	Area to be Covered
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Application Directions

See instructions above.

- G. The correct registration number for this product is "EPA Reg. No. 64439-1".
- H. In the ingredient statement, you can delete the word, "Composition".
- I. It appears that you may have changed the species of the mole from that of the eastern to the star-nosed mole. Use the original graphic or submit a copy of the source document for the graphic to verify the correct mole species.

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,

Daniel B. Peacock for

Robert A. Forrest
 Product Manager (14)
 Insecticide-Rodenticide Branch
 Registration Division (H7504C)

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

Peacock:A:8:305-5407/-6600:Castor\64439-1.FEB

BEST AVAILABLE COPY

EFFECTIVE AND ECONOMICAL MOLE REPELLENT

DIRECTIONS FOR USE
 It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
USE RESTRICTIONS: For repelling eastern moles from lawns.
LOCATING MOLES: The presence of moles may be indicated by a network of surface ridges in the turf or by a series of conical mounds of earth pushed up from deep burrows. Treat all areas that show signs of moles' presence.
MIXING INSTRUCTIONS: Mix well. Mix at a rate of one ounce of MOLE-MED per gallon of water. Use the dilution table below to determine the amount of mixture to prepare for the area that you intend to treat.

AMOUNT OF MOLE-MED	AMOUNT OF WATER	AREA TO BE COVERED
1 oz.	1 gal.	312 sq. ft.
8 oz.	8 gal.	2500 sq. ft.

STORAGE: Store only in original container, in a dry place inaccessible to children and pets.
DISPOSAL: Do not reuse empty container. Rinse thoroughly. Securely wrap in newspaper and discard in trash.

WARNING: PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear safety glasses. Prolonged or frequent skin contact with this product may cause allergic skin reaction on some individuals. Wash thoroughly with soap and water after handling.

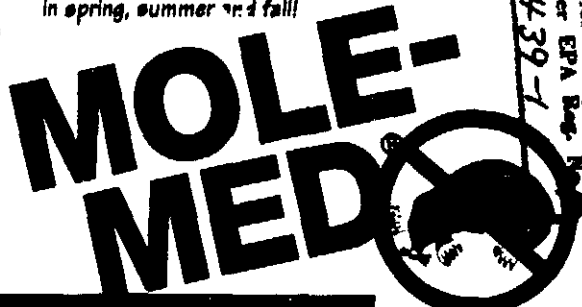
STATEMENT OF PRACTICAL TREATMENT IF IN EYES: Flush with plenty of water. Call a physician. **IF ON SKIN:** Wash with plenty of water. Get medical attention if condition persists.

ENVIRONMENTAL HAZARDS: Do not apply directly to water. **NOTICE:** Buyer assumes all responsibility for safety and use not in accordance with directions.

APPLYING MOLE-MED

1. If the area to be treated is dry, cover the area before applying MOLE-MED.
2. Apply MOLE-MED to the ENTIRE area to be treated with a hose-end sprayer or sprinkling can. Cover thoroughly.
3. Large areas should be done in sections, beginning at one point and working toward cleared "mole exit" point of the total area treated.
4. After application, soak in with water using hose or sprinkler for about 25 minutes. Avoid using excess water that may flow off turf into streams, ponds, gutters or storm sewers. Mole activity may increase as moles leave the treated area.
5. Highly infested areas may require additional applications.
6. If extreme heavy rainfall occurs right after application, it may be necessary to repeat application.

Chases moles away from grass and ornamental turf in spring, summer and fall!



Under the Federal Insecticide, Fungicide, and Rodenticide Act and registered under EPA Reg. No. 64439-1

EPA Letter 20190617

MOLE-MED MOLE REPELLENT

MOLE-MED is a registered trademark of MOLE-MED, Inc.
 MOLE-MED, Inc. P.O. Box 333 Aurora, IN 47001
 EPA Reg. No. 64439-1
 EPA Est. No. 25000-01-001

UPC CODE

MOLE REPELLENT

Coverage: 2,500 square feet

- EFFECTIVE
- ENVIRONMENTALLY FRIENDLY
- ECONOMICAL

MOLE-MED, Inc. P.O. Box 333 Aurora, IN 47001

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