

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

31 MAY 1995

300/5454682
17/2

Mr. Peter S. Winn
Insecolo Environmental Products, Inc.
202 North Avenue #102
Grand Junction, CO 81501

Dear Mr. Winn:

Subject: Amendment - Revised Labeling and Primary Eye Irritation Study
Insecolo
EPA Registration Number 66923-1
Your Submissions Dated February 25 and November 13, 1993

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. On the front label panel revise the ingredient statement to read as follows:

ACTIVE INGREDIENT:

Silicon Dioxide (from diatomaceous earth) 97%

INERT INGREDIENTS:3%

TOTAL.....100%

2. On Back Panels 1-4, place the heading **Directions For Use** above the misuse violation statement.
3. On Back Panel 2, make the following changes:
 - a. Add "**Residential**" in parenthesis after Domestic, i.e., Domestic (**Residential**) Use.
 - b. To facilitate quick identification by the customer, the list of pests should appear on the front label panel or after the misuse violation statement in the Directions for Use section.
 - c. Delete "**Non-food/feed areas**" in the sentence beginning "For control of crawling insects...."
 - d. Delete "**All Purpose**" in the product name. Terms or phrases imply ~~control of insect pests~~ control of insect pests are unacceptable.

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- 4. On Back Panel 3, make the following changes:
 - a. Delete the word **Garden** from the alternate brand name since the labeling does not contain directions for garden use.

- 3. On Back Panels 2-4 make the following changes:
 - a. Delete the paragraphs entitled "Use crack, crevice and spot treatment where food and feed...." and "Use spot treatments in areas...." since these directions are intended for commercial use and not residential use and replace with:

In the home, cover all food handling surfaces and cover or remove all food and cooking utensils and wash thoroughly after treatment.

- 4. For Back Panel 4, add **Residential** to the term "Indoor Use", i.e., Indoor **Residential** Use, since that is the intended market for this product.

A review of the primary irritation study submitted February 25, 1993 indicated that this product can be placed in Toxicity Category IV with respect to eye effects. Thus you may delete the statement of practical treatment and the phrase "**Avoid contact with eyes.**" under the precautionary statements. A copy of the eye irritation review is enclosed for your records.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
 Product Manager 13
 Insecticide-Rodenticide Branch
 Registration Division (7505C)

Enclosure

INSECOLO INSECT CONTROL Back Panel #1;
 INSECOLO ALL PURPOSE Back Panel #2
 INSECOLO ANT CONTROL Back Panel #3
 INSECOLO COCKROACH Back Panel #4
 INSECOLO FLEA & TICK Back Panel #5
 INSECOLO GRAIN & SEED Back Panel #6

3 of 10
 ACCEPTED
 with COMMENTS
 in EPA Letter Dated

31 MAY 1995

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act
 as amended, for the pesticide
 registered under EPA Reg. No.

66923-1

The following seven pages constitute the proposed amended draft master label for the five INSECOLO products listed above. The first page is the Front Panel of the label. The remaining pages contain Back Panel Directions for Use for different customers.

Front Panel: lists ingredients and precautionary statements. This contents of page will be on each container, regardless of use, except the non-applicable title and subtitle(s) will be deleted as described below:

Back Panel #1: lists directions for use for INSECOLO INSECT CONTROL by Commercial/Industrial and Pest Control Operators. This panel will be used only on containers sold for use by these customers. The other Front Panel titles with subtitles will be deleted.

Back Panel #2: lists directions for use for INSECOLO ALL PURPOSE in domestic living spaces and gardens. This panel will be used only on containers sold for use by these customers. The other Front Panel titles with subtitles will be deleted.

Back Panel #3: lists directions for use for INSECOLO ANT CONTROL in domestic living spaces and gardens. This panel will be used only on containers sold for use by these customers. The other Front Panel titles with subtitles will be deleted.

Back Panel #4: lists directions for use for INSECOLO COCKROACH in domestic living spaces. This panel will be used only on containers sold for use by these customers. The other Front Panel titles with subtitles will be deleted.

Back Panel #5: lists directions for use for INSECOLO FLEA & TICK in domestic living spaces. This panel will be used only on containers sold for use by these customers. The other Front Panel titles with subtitles will be deleted.

Back Panel #6: lists directions for use for INSECOLO GRAIN & SEED by commercial users. This panel will be used only on containers sold for use by these customers. The other Front Panel titles with subtitles will be deleted.

Note: Font size for the signal word CAUTION and for precautionary statement KEEP OUT OF REACH OF CHILDREN will conform to requirements in 40 CFR 156.10(h)(1)(E)(iv).

- INSECOLO INSECT CONTROL Back Panel #1
- INSECOLO ALL PURPOSE Back Panel #2
- INSECOLO ANT CONTROL Back Panel #3
- INSECOLO COCKROACH Back Panel #4
- INSECOLO FLEA & TICK Back Panel #5
- INSECOLO GRAIN & SEED Back Panel #6

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HOW INSECOLO WORKS

INSECOLO uses a physical rather than chemical method of control. The diatomaceous earth used in Insecolo is made up of microscopic, whole diatoms which are very absorbent as well as very sharp. Thus Insecolo will pierce the protective waxy coating of an insect and absorb vital moisture causing death by dehydration. Insecolo is also baited with 3% food grade attractants which are baked onto the diatomaceous earth to draw the insects toward the product.

CONTENTS

ACTIVE INGREDIENT:		
Diatomaceous earth (including silicon dioxide other oxides and moisture)	97%	
INERT INGREDIENTS:		3%
TOTAL		100%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND ANIMALS**

CAUTION: Avoid breathing dust. Avoid contact with eyes. Use with adequate ventilation. For commercial and/or prolonged application wear a suitable dust mask approved by NIOSH/MSHA.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in original container in a dry place.
Pesticide disposal: Wrap container and put in trash collection or dispose in approved disposal facility.
Container disposal: Triple rinse and recycle, or wrap and place in trash.

In case of minor spill: Vacuum, or dampen powder with water and sweep. Dispose of in trash.

In case of major spill: Wear respirator while wetting and loading powder into containers. Dispose of in landfill.

WARRANTY STATEMENT

INSECOLO ENVIRONMENTAL PRODUCTS, INC. warrants that this product conforms to the ingredient statement on this label. Since conditions of application may vary, Insecolo Environmental Products, Inc. makes no claims other than those stated on this label.

MANUFACTURED BY INSECOLO ENVIRONMENTAL PRODUCTS, INC.
 S. 1540, 800 W. Pender St.
 Vancouver, BC Canada V6C 2V6

US Pat. No. 5186935
 EPA Registration No. 66923-1
 EPA Establishment No. 65789-1A-001

Net Weight

Batch No.

4

BACK PANEL #1
(ALL NEW) 5 9 10

INSECOLO INSECT CONTROL
For Commercial/Industrial Use
For Pest Control Operators

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

Insecolo Insect Control is approved for use in and around the following locations; homes, apartments, motels, hotels, theaters, auditoriums, kennels, barns, nurseries, offices, warehouses, factories, restaurants, grocery stores, malls, stores, public areas, hospitals, nursing homes (non-occupied patient areas), schools, day care areas (non-child occupied areas), food/feed handling/packaging/transportation/storage areas, public/commercial transportation/storage areas, colleges, universities, public buildings as well as other dry spaces.

Directions for Use

For maximum control, *Insecolo Insect Control* should be dusted directly onto the insect or in and around the areas that they frequent. A thorough application is required for good control. Death of crawling insects continues until *Insecolo* is depleted, dampened or removed. To remove dust, vacuum, mop, sponge or sweep dampened dust. If *Insecolo* is damp before application, do not use. If this product or treated areas become damp after application, clean, dry and reapply *Insecolo Insect Control*.

Avoid introducing dust into the air. To avoid breathing dust, apply *Insecolo* close to desired area, causing the dust to remain low and settle quickly. Do not use as a space spray. Do not apply where children or patients can contact dust.

Use spot treatments in areas where food and feed is received, processed, (including enclosed processing systems), packed (bottled, boxed, canned, wrapped), transported, stored, (including waste), prepared or served. All food should be removed or covered before treatment. No individual spot should exceed 2 sq. ft. Limit spot treatments to wall or floor surfaces where pests have been seen or are suspected of hiding.

Apply *Insecolo Insect Control* sparingly into cracks and crevices using equipment designed to place powder in specific locations such as the squeeze bottle.

When used as directed, *Insecolo Insect Control* effectively kills the following crawling insects and arachnids: cockroaches, silverfish, ants, crickets, houseflies, ticks, bag worms, box elder bugs, fleas, bed bugs, carpet beetles, earwigs, millipedes, centipedes, slugs, caterpillars, potato beetles, snails, spiders, scorpions and mites.

In non-food/feed areas use crack and crevice and spot treatments as described above. Apply *Insecolo Insect Control* at a rate of 7oz. per 500 sq. ft to other interior spaces where pests have been spotted such as: under and behind appliances, along baseboards, door frames and windowsills, along corners of cabinets, closets and shelves or in larger spaces such as attics, spaces above suspended ceilings, garages, porches, utility and storage rooms, basements and crawl spaces. If using *Insecolo Insect Control* for fleas and ticks, dust product to clean, dry bedding as well as any areas that the pet may frequent indoors or under cover. If *Insecolo* is visible after applications to carpets and furniture, vacuum lightly to remove excess dust.

For more information on *INSECOLO* products, please call 1-800-665-6588.

(UPC Code) 7 70255 93625 3

INSECOLO ALL PURPOSE

Domestic use

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

INSECOLO - All Purpose is most effective when applied directly to the insect or in areas that the insect frequents. For continuous control, *Insecolo* should be dusted lightly to any and all dry areas where insects crawl or run. Avoid breathing dust. Do not use as a space spray. Do not apply where children or patients can contact dust.

Directions for Use

For proper control, insects must come into full contact with *Insecolo*. Therefore, it may take several days or applications to control an entire colony or group of insects because of eggs and newly hatched larvae. When used according to directions, death of crawling insects in infested areas continues until product is depleted, dampened or removed. The killing time for one insect ranges from 2 to 48 hours. To remove dust, use vacuum, mop, sponge, or spray the dust lightly with water and sweep. If this product or treated areas become damp after application, clean, dry and retreat area with *Insecolo All Purpose*.

Use crack, crevice and spot treatments where food and feed is received, processed, (including enclosed processing systems), packed (bottled, boxed, canned, wrapped), transported, stored, (including waste), prepared or served. All food should be removed or covered before treatment. No individual spot treatment should exceed 2 sq. ft. Limit spot treatments to wall or floor surfaces where pests have been seen or are suspected of hiding.

For control of crawling insects in non-food/feed areas apply *Insecolo All Purpose* sparingly into the following spaces: in cracks or crevices along windowsills and door frames, under furniture, under and behind appliances, around pipes coming through walls, under sinks, below floors, above ceilings, within walls, in utility closets, around garbage containers, in attics, in spaces above suspended ceilings, garages, porches, utility rooms, storage rooms, basements and outdoors under eaves. A thorough treatment at a rate of 7oz. per 500 sq. ft. is required for good control.

Insecolo All Purpose controls insects such as: ants, cockroaches, fleas, crickets, ticks, silverfish, earwigs, scorpions, spiders and box elder bugs.

For long legged insects and spiders, *Insecolo* must be applied directly onto the insect.

For more information on *INSECOLO* products, please call 1-800-665-6588
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MINOR CHANGES

INSECOLO ANT CONTROL
HOME & GARDEN
Indoor and outdoor use

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

INSECOLO - Ant Control is most effective when applied directly to the ant or in any of the areas that ants frequent.

Directions for Use

To control ants using *Insecolo Ant Control*, each ant must come in contact with the product. This may take 2 to 4 weeks as there are usually thousands of ants in a colony along with eggs that need to hatch. An individual ant that comes in full contact with *Insecolo* will die within 12 to 48 hours. When used according to directions, control of ants in infested areas continues until product is depleted, dampened or removed. In indoor areas, remove dust with vacuum, mop, sponge or by sweeping dampened dust. Reapply as necessary.

For indoor use, *Insecolo Ant Control* should be dusted in any dry areas that you have seen ants run or hide such as: in cupboards, under sinks and appliances, in pantries and closets, around garbage cans, along baseboards, along door frames and window sills in cracks and crevices or in open spaces below floors, above ceilings, within walls or under stairs. A thorough treatment of 7oz. per 500 sq. ft is required for good control.

Avoid introducing dust into the air. To avoid breathing dust when applying, squeeze bottle close to the desired area, causing dust to remain low and settle quickly. Do not use as a space spray. Do not apply where children or patients can contact dust.

Use spot treatments in areas where food and feed is received, processed, (including enclosed processing systems), packed (bottled, boxed, canned, wrapped), transported, stored, (including waste), prepared or served. All food should be removed or covered before treatment. No individual spot should exceed 2 sq. ft. Limit spot treatments to wall or floor surfaces where pests have been seen or are suspected of hiding.

For outdoor use, avoid applying dust on rainy, windy or extremely humid days or when application area is wet. *Insecolo Ant Control* should be dusted to areas outside where you see ants crawling or hiding. Optimum kill rates will take place if the nest is completely dusted. To maintain control of ants outside, continue to dust areas where ants have been seen. Reapply after rain. Surface must be dry for good control.

For more information on *INSECOLO* products, please call 1-800-665-6588.

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MINOR CHANGES

INSECOLO COCKROACH
Indoor Use

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

INSECOLO - Cockroach is most effective when applied directly to the cockroach or in the areas that cockroaches frequent.

Directions For Use

Insecolo Cockroach should be dusted under and behind all appliances, under sinks, around pipes coming through walls, along and behind baseboards, in pantries or closets, around garbage cans, within walls, under stairs, open spaces below floors, above ceilings and in any other cracks or crevices that cockroaches can hide or run. Thorough treatment is required for good control.

Cockroaches often hide in the drip tray under your refrigerator. Empty water out of tray and dry it out completely. Dust *Insecolo Cockroach* into the tray and replace under the refrigerator. Reapply when dust has been completely moistened.

If *Insecolo Cockroach* becomes damp before application, do not use. If treated areas become damp after application, clean, dry and retreat areas with dust.

An individual cockroach that has come into full contact with *Insecolo* will die within 12 to 48 hours. When used according to directions, death of cockroaches in infested areas continues until *Insecolo Cockroach* is depleted, dampened or removed. Remove dust with vacuum, mop, sponge or by sweeping dampened dust.

Use spot treatments in areas where food and feed is received, processed, (including enclosed processing systems), packed (bottled, boxed, canned, wrapped), transported, stored, (including waste), prepared or served. All food should be removed or covered before treatment. No individual spot treatment should exceed 2 sq. ft. Limit spot treatments to wall or floor surfaces where pests have been seen or are suspected of hiding.

Avoid introducing dust into the air. To avoid breathing dust when applying, squeeze bottle close to the desired area, causing dust to remain low and settle quickly. Do not use as a space spray. Do not apply where children or patients can contact dust.

For more information on *INSECOLO* products, please call 1-800-665-6588.

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INSECOLO - FLEA & TICK
Indoor Use

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

INSECOLO - Flea & Tick is most effective when applied directly to the insect or in the areas the insect frequents.

Directions for Use

In order to maintain control of fleas and ticks on your pet, it is necessary to first bathe them using a flea soap or a good dish detergent. At the same time, wash pet's bedding with hot, soapy water to eliminate any fleas, ticks, larvae or eggs that may be present. *Insecolo* should be dusted to pet's bedding when bedding is dry.

If your home is infested with fleas or ticks it is important that you do a thorough vacuuming of your entire living space. We recommend using a new vacuum bag as the suction will be greater. Dispose of the bag in an outside trash bin. You should then dust the following areas: carpets (7oz per 500 sq. ft.), under and behind furniture, under cushions and along baseboards, particularly in the areas where your pet plays or sleeps. A thorough application is required for good control. After you have dusted *Insecolo*, you should leave it down for a couple of hours then lightly vacuum, leaving some *Insecolo* under your furniture and in the cracks and crevices of the infested areas.

Avoid introducing dust into the air. To avoid breathing dust when applying, squeeze bottle close to the desired area, causing dust to remain low and settle quickly. Do not use as a space spray. Do not apply where children or patients can contact dust.

Death of an individual flea or tick that has come in full contact with *Insecolo* will occur between 2 to 48 hours. **It is important to realize that if you have an indoor/outdoor pet, then you will most likely have fleas and ticks being brought into your home on a regular basis during flea season.** This will require an ongoing process of washing your pet and its bedding, regular dusting of the pet's bedding with *Insecolo* and frequent vacuuming of your home. When used according to directions, death of fleas and ticks in infested areas continues until the product is depleted, dampened or removed. *Insecolo Flea & Tick* can be removed with a vacuum, mop, sponge or by sweeping dampened dust.

If the product is dampened before application, do not use. *Insecolo Flea & Tick* must be applied to areas that are dry. If treated areas become damp after application, clean, dry and retreat area with *Insecolo Flea & Tick*.

For more information on *INSECOLO* products, please call 1-800-665-6588.

(UPC CODE)- 7 70255 93525 8

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INSECOLO GRAIN AND SEED

ALL NEW

For Control of Crawling Insects
In Stored Grain and Seeds

For Commercial Use

DIRECTIONS FOR USE

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

When used as directed, control of crawling insects in stored grains and seeds continues throughout the storage period and, after storage, grains or seeds can be used as intended without removal of INSECOLO.

INSECOLO can be used in any dry container where grain and seed are transported or stored, such as silos or elevators, rail cars, ships, truck trailers, and appropriate cans, drums or packages. It provides maximum control when the moisture content of stored grain or seed is 12-15% or less. Long term effectiveness is improved if temperature during storage is high enough to hatch all insect eggs.

If this product, grain or seed are damp before application, do not use. Reduced effectiveness will result if this product or the grain or seed become damp after application. If this occurs, dry grain or seed and reapply INSECOLO.

INSECOLO is approved for use in the following stored grains and seeds:

barley	corn	rice	sorghum (milo)
buckwheat	oats	rye	wheat
beans	flax	peas	soybeans
vegetable and flower seeds			birdseeds

When used as directed, INSECOLO effectively controls damage caused by the following insects:

rice weevils	saw-toothed grain beetles
lesser grain borers	red flour beetles
flat grain beetles	confused flour beetles
merchant grain beetles	Indian meal moth larvae
spider beetle	mealworm beetle
bean weevil	pea weevil
granary weevil	maize weevil
Mediterranean flour moth larvae	

Directions for Commercial use: INSECOLO may be applied to grain or seed at any stage of preparation or transportation after drying and before storage. Two to seven pounds of INSECOLO should be mixed thoroughly with each ton of dry grain or seed to be stored. A hopper with a variable rate auger or conveyor feeder can be used to apply INSECOLO during transfer of material into transportation containers or to the storage area.

Test weight per bushel of seed or grain treated with INSECOLO will be reduced slightly, but this reduction in bulk density should not cause the treated material to be reduced to sample grade if the USDA procedures in GR Instruction 918-6 Aux. 1, dated May 9, 1963 are followed. Stored material treated with INSECOLO will be coated with dust, which may reduce movement speed.

