MAR 2 1995 548 2635 300

Wilder Agriculture Products Co., Inc. P.O. Box 406 Pulaski, PA 16143

Attention: Mr. Eliot E. Harrison

Subject: Wilder's Hot Pepper Wax Ready to Use

EPA Reg. No. 67238-2

Your letter and revised label of February 17, 1995

The "final printed label" submitted with the above letter varies in several ways from the label accepted as part of the Notice of Registration issued for this product to your Company on January 31, 1995. Therefore, we are treating this submission as a proposed, revised label for the product.

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided that you make the following changes to the submitted labeling before you release the product for shipment bearing the amended labeling:

1. The official name of record for this product is:

Wilder's Hot Pepper Wax Ready to Use.

However, the submitted labeling uses the following names for the Front and Back Panels, respectively:

Wilder's "Ready to Use" Insect Repellent for Plants Hot Pepper Wax

Hot Papper Wax Insect Repellent

Using unapproved and conflicting product names on labels is not permissible and is very confusing, both to users and to us. This confusion is compounded by the fact that you also hold a registration for a product with a very similar name, Hot Pepper Wax, EPA Reg. No. 67238-1.

Therefore, make the following changes to the submitted label:

- a. On the Front Panel, use the product name of record:
 Wilder's Hot Pepper Wax Ready to Use.
- b. On the Back Panel, change "Hot Pepper Wax Insecticide Repellent" to "Hot Pepper Wax Ready to Use".
- 2. In our registration notice, we permitted you to use the phrase "Made from Hot Cayenne Peppers" to further explain the active ingredient used in this product. In addition to using the phase in this context, you repeated the phrase, Made from Hot Cayenne Peppers", without qualification, implying that the entire product, both actives and inerts, were made from hot cayenne peppers. This is misleading. Therefore, if you want to use this second reference to the origin of your product, you must qualify it as follows:

Active Ingredient Made from Hot Cayenne Peppers.

3. The heading "Active Ingredient" must be aligned to the same left margin as "Inert Ingredients. See 40 CFR 156.10(g)(1).

Submit one copy of your final printed labeling before you release the product for shipment.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. 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,

Robert A. Forrest Product Manager (14) Insecticide-Rodenticide Branch Registration Division (H7505C)

Enclosures: 1. Stamped Label

2. A-79 Enclosure

Peacock WP#5:A:67238-2:305-5407,-6600:3/2/95

FRECAUTIONARY STATEMENTS
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PAYTRONAL ENTA HAZARDS
product may be trait to aquate organisms. Do not containmale water by the many of equipment or wasters FDGT AD a with plenty of water (

"Ready to Use" WILDER'S

HOT PEPPER WAX-

"Made from Hot Cayenne Peppers"

ACTIVE INGREDIENT
Capassiem and related capssiemoids* 0.1844
INERT INGREDIENTS 99 81644
TOTAL 100.004
"made from Hot Cayenne Peppers
This product contains 0.015 lbs of Active Ingredients per Gallon

NET CONTENTS: 22 02.

CAUTION Keep out of Reach of Children
See Side Panel for Additional Precautions

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HOT PEPPER WAX" INSECT REPELLENT

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

To effectively control and repel aphids, spider mites, thrips, leaf miners, white flies, lace bugs, leaf hopper and seale, spray Hot Pepper Wax Ready to Use to run off on foliage, stems, buds, fruits, blooms. Hot Pepper Wax Ready to Use can be used on fruits, vegetables, catrus, root crops, legumes, and indoor/outdoor ornamen*ils, and grasses

APPLICATION RATE AND TIMING: SHAKE WELL, Apply until foliage is wet. Repeat application in 3-7 days, 2-3 weeks, until control is established. ONCE CONTROL IS ESTABLISHED, use every 2-4 weeks, as necessary to maintain control.

STORAGE AND DISPOSAL

STORAGE: Store only in original container, in a dry place inaccessible to children and pen

DISPOSAL: Do not reuse empty containers. Rinse thomughly. Securely wrap in newspaper and ducard in trash.

Fungaside, 1995

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