

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 20, 2002

Contract Packaging, Inc.
c/o RegWest Company
30855 Rocky Road
Greeley, Co 80631-9375

306
17
S-619983

Attention: Ms. Kim Davis

Subject R&M Rabbit & Deer Repellent Spray - RTU
EPA Reg. No. 67572-43
Our letter of July 29, 2002
Your resubmission of August 7, 2002
Revised Label

Purpose The purpose of your resubmission is to amend the label of your product in accordance with our letter of July 29, 2002

Review of label The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product. A copy of the stamped label is enclosed for your records.

1. Revise your homeowner "STORAGE AND DISPOSAL" text as follows:

STORAGE AND DISPOSAL

Storage: Keep in a cool, dry place inaccessible to children and pets.
Keep container tightly closed to prevent evaporation. Store above 32 F. If frozen, completely thaw and stir well before using.

Disposal:

- **Empty containers:** Do not reuse this container. Place in trash or offer for recycling, if available.
- **Partly filled containers:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Do not place unused product down any indoor or outdoor drain.

Review of label-continued

2. Revise your non-homeowner text as follows:

STORAGE AND DISPOSAL

Storage: Keep in a cool, dry place inaccessible to children and pets. Keep container tightly closed to prevent evaporation. Store above 32 F. If frozen, completely thaw and stir well before using.

Pesticide Disposal: Pesticide wastes ... office for guidance.

Container Disposal: Triple rinse ... out of smoke.

Existing stocks of labels

Stocks of existing labels may be used for eighteen (18) months.

Consequence for non-compliance

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 constitutes acceptance of this condition.

Questions

If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure

Minimum Type Sizes for Final Printed Labels

Letter location

Disk 78:A:\Thiram\67572-43, 8-20-2002, revised label.wpd, August 20, 2002

R & M RABBIT & DEER REPELLENT SPRAY - RTU

Protects Trees and Shrubs from Feeding Damage Caused by Deer, Rabbits and Meadow Mice

Ready-to-Use No Mixing No Measuring

Protects: Nursery Stock, Fruit and Nut Trees, Fruit Bushes and Vines and Ornamentals
Against Feeding Damage by Rabbits, Deer, Meadow Mice

Active Ingredient:		
Thiram (CAS No. 137-26-8)		10%
Other Ingredients		90%
Total		100%

Keep Out of Reach of Children
CAUTION
See back panel for additional precautionary statements.

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:

AUG 20 2002

EPA Reg. No. 67572-43

EPA Est. 67572-GA-1

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
67572-43

Net Contents: ___ oz.

Manufactured by:
Contract Packaging, Inc.
10115 Highway 142 North
Covington, GA 30014

{Back Panel}

DIRECTIONS FOR USE

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

Use Restrictions

R & M Rabbit and Deer Repellent Spray - RTU is a contact repellent containing 10% Thiram. It is a specially formulated ready-to-use (RTU), stable suspension that protects fruit and nut trees, fruit bushes and vines, ornamental trees and shrubs and nursery stock from the feeding damage caused by rabbits, deer and meadow mice. A single application will protect treated plant parts for as long as 3 months, depending on weather conditions.

Preapplication Directions

Keep from freezing. Shake well before using.

When to Apply: Apply only to dry plant surfaces under favorable conditions (moderate temperature and light winds) to ensure the white repellent film will form and set properly. Spraying under favorable conditions is also essential to avoid excessive runoff.

Application Methods

Spray Application: Using the attached sprayer, apply this product as a full coverage spray on trees (before planting), to ornamental plantings or to established nursery stock. Apply on fruit and nut trees, fruit bushes and vines, ornamentals and nursery stock in late summer or early fall, or when rabbit, deer and/or rodent feeding damage is first noticed.

Brush Application: To protect plants' trunk from injury apply on lower trunk of fruit and nut trees and ornamental plantings from ground level to a height of approximately 2½ feet.

Dip (Seedlings) Application: Dip foliage and other parts of ornamental trees and fruit and nut trees seedlings before planting. Thoroughly wet the foliage and other seedling parts to be protected. Allow excess repellent to run off dipped plants avoiding contact with the roots.

Post-application Directions

Immediately clean application equipment after using and before spray dries.

Labeling of Treated Seedlings

Label seedlings treated with this product with the following text:

CAUTION: Treated with Thiram. Handlers must wear the following personal protective equipment: long pants, long-sleeved shirt, shoes, socks and rubber gloves. Direct exposure to skin may result in severe dermatitis. **Thoroughly dry seedlings and nursery planting stock before planting or storing.**

Storage and Disposal	
Do not contaminate water, food or feed by storage or disposal.	
Storage:	Keep in a cool, dry place inaccessible to children and pets. Keep container tightly closed to prevent evaporation. Store above 32°F. If frozen, completely thaw and stir well before using.
Disposal: Empty containers:	Do not reuse this container. Place in trash or offer for recycling, if available. Partly filled containers: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Do not place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Causes eye and skin irritation. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes, on skin or on clothing. Avoid inhaling spray mist or dust. Do not use or store near food or feed. Consumption of alcoholic beverages increases the toxic effects of Thiram.

Personal Protective Equipment

Handlers must wear long pants, long-sleeved shirt, shoes, socks and rubber gloves.

First Aid

If in Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If Swallowed	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information.

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

Environmental Hazards

This pesticide product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. Drift or runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with this label.