

81117-1

04/19/2007

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

CERTIFIED MAIL (7005-0390-0000-2565-2460)

MCB, LLC
3265 St. James Drive
Boca Raton, FL 33434-3374

APR 19 2007

676 80891
1270

Attention: Mr. Roger Brown

Subject Ropel Tree Squirrel, Vole, Dog, and Cat Repellent
EPA Reg. No. 81117-1
Response to Thymol Re-Registration Eligibility Decision (RED)
List C, Case 3143 (1993), Active Ingredient Code 080402
Completion of Re-Registration Process Under Thymol RED

- Purpose**
- You have completed the re-registration process of this product, under sec 4 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) for the Thymol RED.
 - Because of a second active ingredient, **denatonium saccharide**, you will need to complete a similar process under the Denatonium Saccharide RED, when EPA issues it.
 - After you complete the second RED process, we will issue a formal "Notice of Reregistration".
 - We have approved your submitted label, with comments. After the normal period to use existing stocks of your old label, you must use the new label, as specified in this letter.

Labeling The labeling submitted with the above letter is acceptable, provided that you submit one (1) copy of final printed labeling to us, with the following change, before you ship the product.

1. We prefer that you center the headings "**PRECAUTIONARY STATEMENTS**" and "**DIRECTIONS FOR USE**" to distinguish them from the subheadings.
2. Change "**USE RESTRICTIONS**" to "**GENERAL USE RESTRICTIONS**" to distinguish these general restrictions for those specific for individual uses.
3. Under the first use, change "**USE PRECAUTIONS:**" to "**USE RESTRICTIONS:**" and add a subheading "**APPLICATION DIRECTIONS:**" before "Using ... being treated".
4. After "Surfaces to be treated must be dry.", add this sentence, "For treating garbage cans, first remove any droppings and clean with water; then spray both the garbage and its container."
5. Under the second use, add "**USE RESTRICTIONS:**" before "**THIS PRODUCT ... on germination.**" And add "**APPLICATION DIRECTIONS:**" before "Using rubber gloves ..."

Existing stocks Stocks of product with existing labels may be used for eighteen (18) months.

Consequence for non-compliance If this condition is 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 these conditions.

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

Sincerely,



Meredith Laws, Chief
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosures 1. Stamped label
2. Minimum Type Size Requirements for Final Printed Labels

File Location Dan Peacock, Flash Drive 1gb, E:\Denatonium Saccharide\81117-1\Completion of Re-Reg\Letter\81117-1, Completion of Re-Reg Process under Thymol RED, 4-17-2007, ver 4.doc

RO-PEL TREE SQUIRREL, VOLE, DOG, AND CAT REPELLENT

Reduces damage to outdoor structures and surfaces by tree squirrels, dogs, and cats.
Reduces consumption of seeds and bulbs by tree squirrels and voles.

ACTIVE INGREDIENTS:

Denatonium Saccharide 0.065%
Thymol 0.035%
INERT INGREDIENTS 99.900%
TOTAL 100.000%

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 19 2007

Keep out of reach of children
CAUTION

See side panel for additional precautions. any state for use as an Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 81117-1

NET CONTENTS 1 GALLON (3.78 l)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Product has extremely bitter and unpleasant taste. Avoid breathing spray and tasting. Avoid contact with eyes, skin, and clothing. Applicators and other handlers must wear rubber gloves and protective eyewear (safety glasses or goggles). Discard contaminated food. Wash hands with soap and water before eating, drinking, chewing gum, using tobacco or using the toilet. If on clothing, remove and change into clean clothing. Wash contaminated clothing thoroughly.

FIRST AID

Have product container or label with you when calling a poison control center or doctor, or going for treatment.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or on clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

If in eyes: 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.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

[OPTIONAL] Other inquiries: [insert email address, website address, or telephone number here].

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

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

USE RESTRICTIONS

This product is for use only on outdoor structures and surfaces such as brown bark of trees, fences, poles, decks, planters, siding, garbage cans, and furniture and on seeds and bulbs as directed below. Do not use on edible crops, sugaring maple trees, or indoors.

TO REDUCE CHEWING, GNAWING, LICKING, NIBBLING, AND BITING DAMAGE TO OUTDOOR STRUCTURES AND SURFACES SUCH AS BROWN BARK OF TREES, FENCES, POLES, DECKS, PLANTERS, SIDING, GARBAGE CANS, AND FURNITURE BY TREE SQUIRRELS, DOGS and CATS:

USE PRECAUTIONS: THIS PRODUCT may damage painted/stained surfaces, fabrics, and plastics; test a small area first to determine suitability for use. Use at full strength; do not dilute or mix this product with any other chemical. Do not use mist blowers or ultra-low volume application equipment to apply this product. Surfaces to be treated must be dry. Do not apply this product on rainy, snowy or windy days, or if precipitation is predicted within the next 24 hours. Do not use this product at temperatures below 32° F or above 90° F.

Using a sprayer capable of delivering a coarse droplet spray (such as a tank sprayer) spray all surfaces to the point of runoff, or treat by painting with a brush. Make a second application in 2-7 days to improve effectiveness. One gallon of THIS PRODUCT will treat 1,000 to 4,000 sq. ft., depending on surface conditions and porosity of items being treated.

TO REDUCE CONSUMPTION AND DAMAGE TO SEEDS OR BULBS BY TREE SQUIRRELS AND VOLES:

THIS PRODUCT should not cause damage to plants. However, first test THIS PRODUCT on a few seeds to determine any effects on germination. Using rubber

gloves, place seeds or bulbs in a plastic or metal container and spray until thoroughly soaked. Allow to dry. Repeat application in areas of high animal pressure. Then plant in normal manner.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container, in a dry place inaccessible to children and pets.

DISPOSAL: *If Empty:* do not reuse this container. Place in trash or offer for recycling if available. *If Partly Filled:* Call your local solid waste agency for disposal instructions.

Never place unused product down any indoor or outdoor drain.

WARRANTY STATEMENT: The proper storage, use and disposal are beyond our control. To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material especially when such use and handling are contrary to label instructions.

Ro-Pel is a registered trademark of MCB LLC.

MCB, LLC

Boca Raton, FL

EPA Reg. No. 81117-1

EPA Est. 44641-CA-1

Draft label 4/11/2007