

AUG 23 2006

Ms Carrie Crawford
Environmental Resource Technologies, LLC
434 North Main Street, Suite A
Suffolk VA 23434

Dear Ms. Crawford:

Subject: Label Revisions

EPA Registration Number: 83248-1

Product Name: TERM-A-RID 613 Wood Stakes

Application date: May 23, 2006

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable subject to the comments listed below:

- a) There is no required location for the Net Contents/Net Weight statements. The preferred location is the bottom of the front panel below the company name and address. The Net Contents/Net Weight should be exclusive of any wrappers or other materials. 40CFR 156.1(d)(1).
- b) Revise the statement under the FIRST AID STATEMENT section to read:
"Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment" In case of emergency, for additional information call (insert toll-free-emergency number).
- c) Change "INERT INGREDIENTS" to "OTHER INGREDIENTS" in the ACTIVE INGREDIENT section.
- d) Revise the ENVIRONMENTAL HAZARDS statement to read:
"Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark".

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e) Phytotoxicity should be within the Directions for Use section to read as follow:

“Phytotoxicity”

This product may be phytotoxic to plants. When treating around the exterior of structures cover and protect shrubbery, and plants that may be potentially exposed to this product, when applied in accordance with the label directions.”

- f) In the GENERAL INFORMATION section change inorganic salt to read Disodium Octaborate Tetrahydrate and remove the language “or more”
- g) In the APPLICATION section delete “The diluted borate sale is a normal soil . Trace amounts are beneficial to plants.
- h) Change “Formulated for” to “Manufactured for”.

Enclosed is a copy of your label stamped “Accepted with Comments”. Submit three (3) copies of the final printed labeling before you release the product for shipment.

To expedite handling, please return a copy of this letter with your final printed labels. If you have any questions regarding this letter contact Ms. Pat Quarles @ (703) 305-6876.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505c

enclosure

The purpose of TERM-A-RID 613® Wood Stakes is to aid in the detection of worker termites (termites without wings) next to a structure and to reduce their population by feeding on the stake. If worker termites are present, they can be detected by removing the stake from the soil and inspecting the below soil portion for damage. Damage may include grooves or holes in the stake surface or destruction of the stake tip. Feeding on the stakes may kill worker termites and this may reduce the termite population near the stake. Use of this produce does not substitute for mechanical alteration, soil treatment or foundation treatment, but is mere a supplement to a termite monitoring and control program.

ACTIVE INGREDIENT:

Disodium Octaborate Tetrahydrate.....	0.5%
INERT INGREDIENTS.....	99.5%
Total	100.0%

Contains 0.02 ozs. of active ingredient per pound of wood stakes

EPA Reg. No. 83248-1
EPA Est. No. 82186-CA-001
Patent No. 5,564,222

KEEP OUT OF REACH OF CHILDREN
CAUTION

NET CONTENTS: [xx LBS.] ?

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION: Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food. Do not leave package where children or animals may gain access.

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

IF SWALLOWED: Call 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.

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

ENVIRONMENTAL HAZARDS

Do not apply in root system of sensitive plants as it may retard growth. Do not apply directly to any body of water.

STORAGE AND DISPOSAL

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

Storage: Store in a cool, 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.

DIRECTIONS FOR USE

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

GENERAL INFORMATION: TERM-A-RID 613® is a wood stake containing a 0.5% water-soluble inorganic salt. Moisture will leach the borate compound from the stake. The weather becomes the governing factor in the length of time the wood stakes will be effective. Usually the stakes will continue to function up to six or more months under ordinary climatic conditions. TERM-A-RID 613® all wood stakes are not a replacement for routine termite inspection and treatments when activity is discovered.

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APPLICATION

Place one TERM-A-RID 613® wood stake vertically into the ground no more than five (5) feet apart along the line of the foundation. Push or hammer the wood stake into the ground until it is about one inch below the surface. If possible, place the wood stake three (3) feet out from the structure. The wood stake may be placed closer if there is no alternative. Place wood stakes around patios and sidewalks that abut the primary structure. Also place wood stakes no more than five (5) feet around garages, tool sheds, pump houses, stables and other wood structures. It is recommended that Term-A-Rid 613® stakes be checked on a regular basis, at least every 90 days. If termite activity is noted, they should be checked on a monthly basis and replaced as needed for best results. The wood stakes are of wood and are totally biodegradable. The diluted borate sale is a normal soil component. Trace amounts are beneficial to plants.

NOTICE

Because of many varying conditions affecting use and application the manufacturer warns the buyer that these may impair or vary the results or effects of the use of this product. Neither manufacturer nor seller shall be liable in respect to any injury or damage suffered by reason of the use of this product for purposes not indicated by the label, or when used contrary to the directions hereon, nor with respect to any breach of any warranty not expressly specified herein. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no express warranties on TERM-A-RID 613® or implied warranties of merchantability or fitness for any particular purpose except as specifically stated hereon. Manufacturer shall not be liable for any consequential damage based on the use of this product.

Formulated for:
ENVIRONMENTAL RESOURCE TECHNOLOGIES, LLC.
434 North Main Street
Suite A
Suffolk, VA 23434

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

AUG 23 2006

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

8324R-1

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