

506-182

4/19/2001

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

APR 19 2001

Kim Davis  
Consultant/Agent for Walco-Linck Company  
RegWest Company  
30856 Rocky Road  
Greeley, CO 80631-9375

Subject: Amendment - Revised Labeling  
TAT Crawling Insect Killer  
EPA Reg No. 506-182  
Your submission dated January 3, 2001

Dear Ms. Davis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below. A stamped copy of the label has been enclosed for your records.

1. Revise the third sentence in the "Precautionary Statements" section to read "Wash thoroughly with soap and water after handling."
2. Move the sentences "In the home...has dried." to the "Directions for Use" section.
3. Move the "Storage and Disposal" section to the end of the "Directions for Use" section of the label.
4. Revise the second sentence under "Physical or Chemical Hazards" to read "Do not use or store near heat or open flame." You may delete the sentence "Incineration of container may cause explosion."

We presume that you have efficacy data to support the claim "Kills on Contact and Keeps on Killing". However, efficacy data for the following public health pests were not provided in

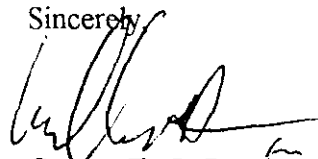
7505C  
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your application or in the cited product: black widow spiders, cockroaches, scorpions, centipedes, fleas, and ticks. Claims for black widow spiders, cockroaches, scorpions, centipedes, fleas, and ticks, should be supported by existing or additional efficacy data. Please provide (or have your supplier provide) the appropriate data in support of these pests.

To expedite handling, please return a copy of this letter with your finished labeling. If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,



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

Enclosure

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# TAT CRAWLING INSECT KILLER

**Pressurized Spray**

**For Use Only In and Around Residential Areas Such as  
Apartments, Attics, Basements, Boats, Campers, Cabins, Garages, Homes,  
Household Storage Areas, Pet Sleeping Areas and Rooms**

**Effective Against Ants, Cockroaches, Fleas, Ticks and Other Listed Insects**

**Fast Killing**

**Kills on Contact and Keeps on Killing**

**GUARANTEED!**

**See Details on Back**

**ACTIVE INGREDIENTS:**

Prallethrin (CAS Number 23031-36-9) .....	0.03%
Esfenvalerate (CAS Number 66230-04-4) .....	0.05%
*N-Octyl bicycloheptene dicarboximide* (CAS Number 113-48-4) .....	0.30%
<b>**OTHER INGREDIENTS</b> .....	<b>99.62%</b>
Total .....	<b>100.00%</b>

\*MGK® 264, Insecticide Synergist

MGK is a registered trademark of McLaughlin Gormley King Company

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

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated**

**APR 19 2001**

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

506-182

**Net Weight Contents:** \_\_\_ fl. oz. ( \_\_\_ g.)

**EPA Reg. No. 506-182**

**EPA Est. \_\_\_\_\_**

**Manufactured for  
Walco-Linck Company  
~~18 Ford Products~~ ~~in~~ ~~Drawer~~ A P.O. Box 598  
Valley Cottage, NY 10989  
1-800-338-2329**



**Contains no CFCs or other ozone depleting substances.  
Federal regulations prohibit CFC propellants in aerosols.**

XXXXX = additions; XXXXXX = deletions

### DIRECTIONS FOR USE

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

#### [Storage and Disposal]

**Storage:** Store in a cool dry preferably locked storage area inaccessible to children and pets and away from heat or open flame.  
**Disposal:** Replace cap, wrap and put discard container in trash. Do not incinerate or puncture. [Alternate Disposal Directions:  
**Disposal:** This container may be recycled in aerosol recycling centers. Before offering for recycling, empty the can by using the product according to the label (Do not puncture!). If recycling is not available, replace cap, wrap the container and put in trash.]

#### General

##### Shake Well Before Use Do Not Use as a Space Spray

**General:** Use this spray only as a spot or crack and crevice treatment to control cockroaches [roaches], fleas, silverfish, ticks, waterbugs and other insects listed below. Apply this product only as a coarse spray or crack and crevice treatment to localized areas where pests are found or may occur. Spray surfaces until wet, but not to the point of runoff. Do not allow spray to contact Care should be taken to avoid depositing the product onto exposed surfaces and do not introduce spray or introducing the material into the air. Do not contaminate Avoid contamination of food or food handling surfaces.

#### For Spot Treatment

For Spot Treatment [To Kill] Ants, Black Widow Spiders, Carpet Beetles, Centipedes, Cigarette Beetles, Cockroaches [ <u>Roaches</u> ], Confused Flour Beetles, Crickets, Indian Meal Moths, Rice Weevils, Saw-toothed Grain Beetles, Scorpions, Silverfish, Sowbugs and Spiders	Spray areas where these insects are found or may hide, including dark corners of rooms and closets; cracks and crevices in walls; along baseboards and door and window frames; behind and beneath sinks, stoves, refrigerators and cabinets; and around garbage cans, plumbing and other utility installations. <u>Directly spray</u> pests driven out of hiding places <u>should be sprayed directly.</u> For ants spray ant trails and around doors and windows, and wherever else these pests may find entrance. For control of Black Carpet Beetles, spray along baseboards and edges of carpeting, under carpeting, rugs and furniture and wherever these insects are seen or suspected.
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[To Kill] Brown Dog Ticks and Fleas	Thoroughly apply as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames, and localized areas of floor and floor coverings where these pests may be present. <u>Remove</u> pet's old bedding <u>should be removed</u> and replaced with clean, fresh bedding after treatment. <u>Do not spray pets with this product.</u> Prior to pets' reentry into treated area, <u>treat pets should be treated with a flea and tick control product registered for use on pets prior to reentering treated areas.</u>
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#### For Crack and Crevice Treatment

For Crack and Crevice Treatment [To Kill] Ants, Black Widow Spiders, Brown Dog Ticks, Carpet Beetles, Cockroaches [ <u>Roaches</u> ], Crickets, Fleas, Scorpions, Silverfish, Sowbugs and Spiders	<u>Directly</u> apply spray in small amounts directly into cracks and crevices.
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For Flies and Mosquitoes	Use only outdoors as an aid in reducing annoyance from these insects. Spray outside surfaces of window and doorframes as well as other areas where these pests may enter the <u>premise home.</u> Also spray dark corners and localized resting areas (such as under eaves) of porches, patios and garages where these insects may congregate. Flies and mosquitoes coming to rest on treated surfaces will be killed.
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### PRECAUTIONARY STATEMENTS

#### Hazards to Humans & Domestic Animals

**CAUTION:** Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Thoroughly wash thoroughly with soap and water after use handling. In the home, cover all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Cover or remove exposed food should be covered or removed. When used indoors, remove pets and birds and cover fish aquariums before spraying. Do not allow children or pets to contact treated surfaces until spray has dried.

XXXXXX = additions; XXXXXX = deletions

**First Aid**

**If Swallowed:** Call a physician or poison control center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting. **If on Skin:** Wash with plenty of soap and water. Get medical attention if symptoms or irritation occur.

<b>If Swallowed</b>	<ul style="list-style-type: none"> <li>• <u>Immediately call a poison control center or doctor for treatment advice.</u></li> <li>• <u>Have person sip a glass of water if able to swallow.</u></li> <li>• <u>Do not induce vomiting unless told to do so by the poison control center or doctor.</u></li> <li>• <u>Do not give anything by mouth to an unconscious person.</u></li> </ul>
<b>If on Skin or Clothing</b>	<ul style="list-style-type: none"> <li>• <u>Take off contaminated clothing.</u></li> <li>• <u>Immediately rinse skin with plenty of water for 15-20 minutes.</u></li> <li>• <u>Call a poison control center or doctor for treatment advice.</u></li> </ul>
<p><u>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-888-740-8712 (the international poison center) for emergency medical treatment information.</u></p>	

**Physical or Chemical Hazards**

Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Incineration of container may cause explosion. Do not apply this product in or on electrical equipment due to the possibility of shock hazard.

**Environmental Hazards**

Do not contaminate water when disposing of equipment washwaters.

For additional information call 1-800-338-2329

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Money Back Guarantee: If this product fails to kill the listed insects when used as directed, mail container to Walco-Linck for a full refund.

Made in [the] USA

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