

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 19, 2011

Mr. William H. Metzger Chemsico A Division of United Industries Corp. P.O. Box 142642 St. Louis, MO 63114-0642

Subject: Label Amendment—Adding Agency-mandated mitigation for total release fogger

products

Product Name: TAT® Total Release Water Based Fogger

EPA Reg. No.: 9688-307 (formerly 506-181)

Application Dated: October 8, 2011 (application submitted under reg. no. 506-181)

Decision Number: 458643

Dear Mr. Metzger:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the label is enclosed for your records

If you have any questions, you may contact Clayton Myers at (703) 347-8874 or myers.clayton@epa.gov.

Sincerely,

for

Mark Suarez, Product Manager Insecticide Branch Registration Division (7505P)

Enclosure: Stamped Label

TAT Total Release Water Based Fogger

[Note to Reviewer: Optional Marketing Language to be used on can, box, peel out booklet or insert]

[Kills: Cockroaches [Roaches], Fleas, Spiders [and] Brown Dog Ticks, [Crickets, Spiders and Houseflies]

Kills: Ants, Cockroaches [Roaches], Fleas, Spiders [ant] Brown Dog Ticks, [Crickets, Spiders and Houseflies]

Kills Cockroaches [Roaches], Fleas, Houseflies, Sowbugs, Crickets, Sawtoothed Grain Beetles and Small Flying Moths

Total Release Aerosol

For Use in Apartments, Attics, Basements, Boats, Cabins, Campers, Garages, Homes, Household Storage Areas, Pet Sleeping Areas and Rooms

One Unit [Can] Treats up to 5,000 Cubic Feet (625 sq. ft. x 8 ft. high) [a room [an area] up to 25' x 25' with an 8' ceiling] {For use with 5 oz can}

One Unit [Can] Treats up to 6,000 Cubic Feet (750 sq. ft. x 8 ft. high] [750 sq. ft.] [a room [an area] up to 25' x 30' with an 8' ceiling] {For use with 6 oz can}

One Unit [Can] Treats up to 2,000 Cubic Feet (a room [an area] up to 10' x 25' with an 8' ceiling) {For use with a 2 oz can}

Fragrance Free

[GUARANTEED! See Details on Back]

[Guaranteed to Work or Your Money Back]

Contains 3 Cans [Foggers]

Contains 4 Cans [Foggers]

4 Cans [Foggers] treat 4 Rooms

4 3 Cans Inside

BONUS 33% more – Four 5 oz cans for the price of three!

One [Can] Treats up to 5,000 cubic feet ([Average room size] 25' x 25' with an 8' ceiling) {For use with a 5 oz can}

One [Can] Treats up to 6,000 Cubic Feet ([Average room size] 25' x 30' with a 8' ceiling) {For use with a 6 oz can}

One can [of fogger] will treat a [room] [area] up to 25 feet [ft.] x 25 feet [ft] with an 8 foot ceiling. {for use with a 5 oz can}

One can [fogger] will treat a [room] [area] up to 25 feet [ft] x 30 feet [ft] with an 8 foot ceiling {for use with a 6 oz can}

One can [of fogger] will treat a [room] [area] up to 10 feet [ft.] x 25 feet [ft.] with an 8 foot ceiling {for use with a 2 oz can}]

ACCEPTED DEC 1 9 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA. Reg. No: 9688-307

{Text on Can}

TAT Total Release Water Based Fogger

| Active Ingredients: | |
|---------------------------------------|--------|
| Tetramethrin | 0.2% |
| Esfenvalerate | 0.1% |
| *N-Octyl bicycloheptene dicarboximide | 1.0% |
| Other Ingredients: ** | 98.7% |
| Total | 100.0% |
| *MGK®-264, Insecticide Synergist | |
| **Contains petroleum distillate | |

KEEP OUT OF REACH OF CHILDREN CAUTION

See {appropriate location} back panel [insert inside cap] [insert inside box] [hang tag] [outside/inside box [carton] [peel out booklet] for [complete] [additional] directions for use, precautionary statements and first aid]

[Available in English and Spanish]

[The entire label is printed in Spanish language inside/outside the box, on insert [located] inside cap, inside box, on hang tag or on peel out booklet]

Storage and Disposal

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

Pesticide Storage: Store in a cool, dry (preferably locked) storage area inaccessible to children and pets and away from heat or open flame.

Pesticide Disposal and Container Handling: Do not puncture or incinerate! Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

PRECAUTIONARY STATEMENTS Hazards to Humans & Domestic Animals

CAUTION: Breathing spray mist may be harmful. Harmful if inhaled or absorbed through skin. Avoid inhaling spray mist and contact with skin or clothing. Thoroughly wash with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash before reuse. Do not use in commercial food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared, processed or stored. In the home, cover all food processing

surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food. Remove pets and birds and cover fish aquariums before spraying.

FIRST AID

| 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. |
| Take off contaminated clothing. Immediately rinse skin with plenty of water for 15-20 minutes. |
| 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. |
| ontrol center or doctor for treatment advice. Have the product container or when calling a poison control center or doctor, or going for treatment. In regarding medical emergencies or pesticide incidents, call 1-xxx-xxx- |
| V |

Physical or Chemical Hazards



Highly Flammable Ingredient Ingrediente Altamente Inflamable

Contents under pressure. Do not use or store near heat, sparks or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the *Directions for Use* on this label very carefully.

[For additional information call 1-800-338-2329]

NET WT: OZ (xx g) {1.5 OZ through 6 OZ}
Total Net Wt. xx OZ (xx g)
EPA Reg. No. 9688-307

EPA Est. No

The letter(s) of the lot code correspond to the establishment

[Sold by] Walco Linck Company 3300 Corporate Drive, Joliet, IL 60431 1-800-338-2329

{Additional information from the stamped accepted label may be provided on the can as space allows}

{Text on box, peel out booklet or insert}

TAT Total Release Water Based Fogger

| Active Ingredients: | |
|---------------------------------------|--------|
| Tetramethrin | 0.2% |
| Esfenvalerate | 0.1% |
| *N-Octyl bicycloheptene dicarboximide | 1.0% |
| Other Ingredients: ** | 98.7% |
| Total | 100.0% |
| *MGK®-264, Insecticide Synergist | |
| **Contains petroleum distillate | |

KEEP OUT OF REACH OF CHILDREN CAUTION

See {appropriate location} back panel [insert inside cap] [insert inside box] [hang tag] [outside/inside box [carton] [peel out booklet] for [complete] [additional] directions for use, precautionary statements and first aid]

[Available in English and Spanish]

[The entire label is printed in Spanish language inside/outside the box, on insert [located] inside cap, inside box, on hang tag or on peel out booklet]

| NET WT: | OZ (xx g) |
|-------------------------|-----------|
| {1.5 OZ through 6 OZ} | |
| Total Net Wt. xx OZ (xx | (g) |

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

[Read entire label before each use.]

This product kills ants, brown dog ticks, cockroaches, confused flour beetles, crickets, fleas, houseflies, mosquitos, rice weevils, sawtoothed grain beetles, small flying moths, sowbugs and spiders (including black widow).

Use Restrictions:

- Do not use multiple canisters in a room.
- · Do not use in small confined areas
- Turn off ignition sources.
- Remove or cover exposed food.
- Air out the room before entering.
- Fill out and place hang-tag on the door to the treated area to alert family and others with access to the treated area not to enter for 2 hours.
- Do not remain in treated area.
- Vacate the treated house, individual apartment unit or other structure immediately. Do not re-enter for 2 hours
- Wait two (2) hours after application, then open windows, vents and doors for two hours. If an odor is still detected, additional ventilation is required.
- Do not apply this product in a way that will contact any person, pet, either directly
 or through drift. Keep people and pets out of the area during application.

FOR HOUSEHOLD USE ONLY

Does not control bed bugs.

{The following statements can be modified for larger size cans as long as the use rate remains 1 ounce per 1000 cu. ft.}

(One 2 oz can will treat an area up to 2000 cu ft (10' x 25' with an 8' ceiling) (One 1.5 oz can will treat an area up to 1600 cu ft (10' x 20' with an 8' ceiling)

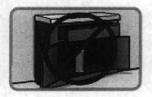
HOW TO USE THIS PRODUCT CORRECTLY:

DO NOT use multiple canisters in a room.



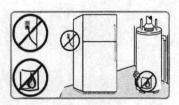
{graphic size 2.25 cm x 3.5 cm minimum}

DO NOT use in small, enclosed spaces such as closets, cabinets, or under counters or tables. Use of a fogger in an enclosed space may cause the product to explode, resulting in injury to people or damage to property. DO NOT use in a room 5 ft x 5 ft or smaller; instead allow fog to enter from other rooms.



{graphic size 2.25 cm x 3.5 cm minimum}

Turn off ALL ignition sources such as pilot lights (shut off gas valves), other open flames, or running electrical appliances that cycle on and off (i.e., refrigerators, thermostats, etc.) Call your gas utility or management company if you need assistance.



{graphic size 2.25 cm x 4 cm minimum}



{graphic size 2.25 cm x 3.5 cm minimum}

Step 1: BEFORE YOU FOG:

OPEN cabinets, cupboards, drawers, closets and doors in area to be treated. REMOVE or cover exposed foods, dishes, utensils, food processing equipment and surfaces. Cover waxed wood floors, waxed furniture and other plastic surfaces near the fogger (newspaper may be used). Remove pets and birds before application. Cover any water inhabited by fish (such as aquariums) during treatment and turn aquarium systems off. CLOSE outside doors and windows. SHUT OFF fans and air conditioners.



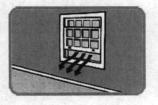
{graphic size 2.25 cm x 3.5 cm minimum}

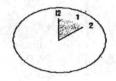
Step 2: TO START FOGGING:

Do not place on water stainable surface. Place a chair or table in the center of area to be fogged approximately 2 ft above the floor. Cover with several layers of newspaper or paper towels. Tilt can opening AWAY from face and depress tab firmly with thumb until it clicks in locked position. Set fogger on newspaper; fill out and place door knob hangtag on the door to the treated area and immediately leave the area.

Step 3: AIRING OUT

Vacate the treated house, individual apartment unit, or other structure immediately. Do not remain in the area during treatment. Keep treated area closed for 2 hours. Do not re-enter for 2 hours. Before reoccupying the area, open all doors and windows and allow to air for 2 hours.





{graphic size 2.25 cm x 3.5 cm minimum}

clock graphic

To kill fleas and brown dog ticks: Destroy pet's old bedding and replace with clean, fresh bedding after treatment is completed. Use product as above. Prior to pets' reentry into treated area, treat pets with a flea and tick control product registered for use on pets.

Storage and Disposal

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

Pesticide Storage: Store in a cool, dry (preferably locked) storage area inaccessible to children and pets and away from heat or open flame.

Pesticide Disposal and Container Handling: Do not puncture or incinerate! Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

PRECAUTIONARY STATEMENTS Hazards to Humans & Domestic Animals

CAUTION: Breathing spray mist may be harmful. Harmful if inhaled or absorbed through skin. Avoid inhaling spray mist and contact with skin or clothing. Thoroughly wash with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash before reuse. Do not use in commercial food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared, processed or stored. In the home, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food. Remove pets and birds and cover fish aquariums before spraying.

FIRST AID

| 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. Take off contaminated clothing. Immediately rinse skin with plenty of water for 15-20 minutes. Hold eye open and rinse slowly and gently with water for 15-20 |
|--|
| Immediately rinse skin with plenty of water for 15-20 minutes. |
| 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. |
| ol center or doctor for treatment advice. Have the product container or a calling a poison control center or doctor, or going for treatment. garding medical emergencies or pesticide incidents, call 1-xxx-xxx- |
| |

pneumonia.

Physical or Chemical Hazards



Highly Flammable Ingredient Ingrediente Altamente Inflamable

Contents under pressure. Do not use or store near heat, sparks or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the *Directions for Use* on this label very carefully.

[For additional information call 1-800-338-2329]

[Questions? Comments? See code on the bottom of can then call (800-xxx-xxxx) or Email info@xxx.com.]

[Notice: To the extent consistent with applicable law, the 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 Company for a full refund.]

[Made in [the] USA]

[No CFCs]

[Contains no CFCs or Other Ozone Depleting Substances] [Federal Regulations Prohibit CFC Propellants in Aerosols]

[Sold by] Walco Linck Company 3300 Corporate Drive Joliet, IL 60431 1-800-338-2329

EPA Reg. No. 9688-307 EPA Est. No.

[The letter(s) of the lot code correspond to the establishment]

{Hang Tag}

| Text on Door Knob Hang Tag |
|--|
| [Attention:] [Notice:] [Caution]: Fogger In Use |
| [Area has been treated with {product name} Fogger.] |
| Note to User: Fill out and place hang-tag on the door to the treated area to alert family and others with access to the treated area not to enter for 2 hours. |
| [Do not enter [re-enter] treated [house] [apartment] [premises] untilAM/PM ondate] |
| [Do not return to [enter] treated premises for 2 hours [until 2 hours have expiredAM/PM [day]] |
| [Air out the room] [Wait 2 hours after application, then open windows, vents and doors in an odor is still detectable.] |
| Area may begin airing out at: on |
| (time -2 hours after activation) (date) |
| [Area may be re-entered after airing out time:on |
| [cut here [scissors illustration] and hang on your door] |