

JAN - 4 1994

Mr. Edward Piranian
Contact Industries
Division of Safeguard Chemical Corporation
411 Wales Avenue
Bronx, New York 10454

Dear Mr. Piranian:

Subject: Revised Labeling
Roach and Ant Killer II
EPA Registration No. 10806-52
Your Application Dated October 26, 1993

The labeling 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.

1. Correct the spelling of the chemical name for chlorpyrifos in the Ingredients Statement (ie. O,O,-diethyl).
2. Delete the colon which follows the signal word, Caution, on the front panel. The signal word should only be used to refer to the toxicity of the formulation, and not to bring attention to the fact that the contents are under pressure.
3. Revise the Physical and Chemical Hazards statement by deleting the words "caution" and "flammable." Caution is the signal word for the product and should only be used to identify the toxicity category of the product. Regarding the flammability of this formulation, your previous labeling has not identified it as flammable, and according to the Confidential Statement of Formula (dated December 1, 1987), the flash point of the product is 110°F and the flame extension is 18 inches. When this information is applied to section 156.10 of Title 40 of the Code of Federal Regulations, the product is not considered to be flammable. The rest of the text in the Physical and Chemical Hazards section is appropriate.

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- 4. On the back panel, the last sentence of the Directions for Use, which begins "Do not apply this product in conduits..." should be moved to the Physical and Chemical Hazards section.

A stamped copy of the label is enclosed for your records. Five copies of the final printed labeling, incorporating the changes noted above, should be submitted for our files. Please submit this labeling within 60 days of the date of this letter.

Sincerely,

DHE

Dennis H. Edwards, Jr.
Product Manager 19
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

Front Label

395
ACCEPTED
with COMMENTS
in EPA Letter Dated

ROACH AND ANT KILLER II

JAN - 4 1994

Chlorpyrifos Pressurized Residual Spray
With Synergized D-Trans Allethrin

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
10806-52

For Use In Homes and Food and Non-Food Areas of Kennels, Commercial Buildings:
Warehouses, Theaters, Office Buildings, Schools, Motels, Hotels, Restaurants and
Food Processing Facilities.

ACTIVE INGREDIENTS:

d-trans Allethrin	0.050%
Related compounds.....	0.004%
N-Octyl bicycloheptene dicarboximide.....	0.400%
*Chlorpyrifos 0,0,-dietyly 0-(3,5,6-trichloro-2-pyridyl) phosphorothioate.....	0.500%
**INERT INGREDIENTS.....	99.046%

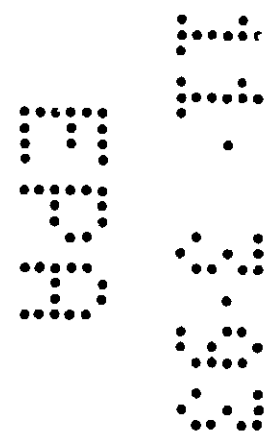
*U.S. Patent No. 3,244,586 - Dow Chemical Company
MGK-264 Synergist

**Contains Petroleum Distillate

KEEP OUT OF REACH OF CHILDREN

CAUTION: CONTENTS UNDER PRESSURE.

Net Wt. 12.75 Oz. (362 Grams)



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

May be fatal if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist and provide adequate ventilation of area being treated. Avoid contact with skin, eyes and clothing. In case of contact, immediately flush skin and eyes with plenty of water. Wash thoroughly with soap and water after handling. If poisoning occurs, get prompt medical attention.

Do not apply directly to food. In commercial food handling facilities, cover or remove any food and food processing equipment during application. Do not apply while food processing is underway. In the home, all food processing surfaces and utensils should be covered during treatment, and thoroughly washed before use. Remove pets, birds, and cover fish aquariums before spraying.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams and ponds. Do not apply directly to water or to areas where surface water is present. Do not contaminate water by disposal.

PHYSICAL AND CHEMICAL HAZARDS

CAUTION: FLAMMABLE. CONTENTS UNDER PRESSURE. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130 F may cause bursting.

STATEMENTS OF PRACTICAL TREATMENT

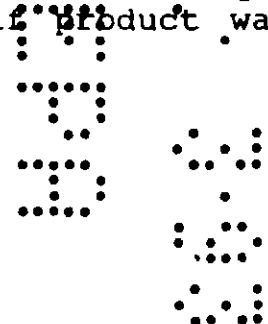
IF SWALLOWED: Call a physician or Poison Control Center immediately. Gastric lavage is indicated if material was taken internally. **DO NOT INDUCE VOMITING.** Vomiting may cause aspiration pneumonia.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered but only in conjunction with atropine. This product contains petroleum distillate solvent which may present an aspiration hazard. Gastric lavage may be indicated if product was taken internally.



DIRECTIONS FOR USE

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

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE AND SPOT TREATMENT ARE NOT PERMITTED.

Use as a spot or crack and crevice treatment to control cockroaches, waterbugs, silverfish, ticks, fleas and other insects listed below. Apply this product to localized areas where pests are found or may occur. Spray surfaces until wet.

SPOT TREATMENT: TO KILL ANTS, ROACHES, CRICKETS, SILVERFISH, SOWBUGS, SPIDERS AND EARWIGS: Spray into cracks, crevices, around baseboards,; and other places where these insects hide. Apply behind and beneath cabinets, refrigerators, sinks, stoves, and in and around waste containers. Contact directly as many insects as possible. For ants, spray trails and places where ants enter premises. Repeat as necessary for control.

TO KILL BROWN DOG TICKS AND FLEAS: Remove and destroy old bedding. Spray sleeping quarters of pets, around baseboards, windows and door frames, wall cracks, and local areas of floors. Repeat as necessary. Fresh bedding should be placed in animal quarters after spray has dried. Do not spray animals. Treat your pets with a registered flea and tick product to control the source of infestation.

TO KILL CARPET BEETLES AND DERMESTIDS: Spray along baseboards, edges of carpeting, under carpets and rugs, under furniture, in closets, on shelving, and in other places of harborage. Repeat as necessary.

FOR CRACK AND CREVICE: APPLY AS FOLLOWS: TO KILL ANTS, ROACHES, CRICKETS, SILVERFISH, SOWBUGS, SPIDERS, EARWIGS, BROWN DOG TICKS, FLEAS, CARPET BEETLES AND DERMESTIDS: Application within food handling establishments (places other than private residences in which food is held, processed, prepared or served) including, but not limited to, restaurants, grocery stores, bakeries, bottling plants, canneries and grain mills: Use as a spot treatment to kill ants, roaches, crickets, silverfish, sowbugs, spiders, earwigs, brown dog ticks, fleas, carpet beetles and dermestids in and around both food and non-food areas by application to localized areas where the above pests have been seen or are suspected of hiding or entering. Apply only enough spray to thoroughly cover the surfaces treated using special care to avoid unnecessary runoff. Do not introduce the spray into the air or allow the spray to contact food or food-contacting surfaces. Areas treated may include dark corners of rooms and closets; along and behind baseboards; beneath and behind stoves; floor drains and around plumbing and other utility installations. Spot treatment may encompass crack and crevice treatment by applying small amounts of product directly into openings leading to voids and hollow spaces in walls, equipment legs and bases or which occur at points between different elements of construction or between equipment and floors. Do not apply this product in conduits, motor housing, junction boxes and switch boxes or other electrical equipment because of possible shock hazard.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

STORAGE: Store in a cool, dry area away from heat or open flame.

DISPOSAL: Do not re-use empty container. Replace cap and discard container in trash. Do not puncture or incinerate.

EPA REG. NO. 10806-52

EPA EST. NO. 10806-NJ-1

CONTACT INDUSTRIES DIV. OF
SAFEGUARD CHEMICAL CORP.
NEW YORK, NY 10454

