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Ms. Lisa McClellan  
Sprayon Products  
Div. of the Sherwin-Williams Co.  
26300 Fargo Avenue  
Bedford Heights, OH 44146

rbb - 7 1992

Subject: Amendment - Revisions in response  
to Diazinon Registration Standard  
859 Aqueous Roach & Ant Spray with Diazinon  
EPA Reg. No. 10900-68  
Your submission dated February 20, 1991

Dear Ms. McClellan:

The amendment referred to above, submitted in connection with a registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided the following revisions are made prior to release for shipment under the amended labeling:

- 1) The claim for flea control must be deleted from the label. Your application to add flea control to this label was not accepted in 1984. Please note that the Fairfield American product (EPA Reg. No. 4816-650) that you referenced to support registration of your product, as well as your rejected 1984 application to add a flea control claim, does not include a flea control claim on its label.
- 2) The front panel claim for control of "Ticks" must be revised to read "Brown Dog Ticks", the tick species named in the Directions for Use.
- 3) Is this product cleared by USDA for use in USDA meat and poultry plants? If not, the revise the front panel claim to indicate "...and Food Processing Plants (except USDA Meat and Poultry Plants)".
- 4) On the front panel beneath the signal word "CAUTION" you need not include "HARMFUL IF SWALLOWED OR INHALED. AVOID CONTACT WITH SKIN." which is only a partial indication of the routes of exposure as detailed in the revised Hazards to Humans & Domestic Animals text, i.e., "Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes, and clothing."

- 5) At the end of the first paragraph following the heading "Directions for Use", replace "Do not use as a space spray." with the following. "Do not use this product indoors as an overall surface spray or as a space spray. Apply as a localized surface spray only. Take care not to introduce this product into the air during application. Use only in well-ventilated areas. Do not apply this pesticide when occupants are present in the immediate area. Do not apply this pesticide when classrooms are in use. Do not apply this pesticide in patient rooms or in any room occupied by the elderly or infirm. Do not apply where children are likely to frequently contact treated surfaces. Before spraying this product, remove or cover all exposed food, and remove pets and cover fish aquariums. Do not spray plants, pets, or humans. All food preparation surfaces and utensils should be covered during spraying or thoroughly washed with soap and water before use. Do not spray inside cabinets where food is stored. Do not use in conduits, motor housings, or electrical switch boxes."

You may then delete similarly worded directions that appear in the "Hazards to Humans & Domestic Animals" section.

- 6) In the directions for control of ants, etc., add a semicolon after "cabinets", since this sets apart the group of sites which should be sprayed "behind and beneath".
- 7) In the directions for control of ants, etc., delete "and other utility installations", since this could be construed as recommending spraying into areas where electrical contact could occur, which is not acceptable for a water-based product. The required precaution about de-energizing electrical equipment already is present in the directions for crack and crevice application in food handling establishments.
- 8) Also in the directions for control of ants, delete "nests". This not appropriate for indoor use directions.
- 9) In the directions for use outdoors, revise "house flies" to "houseflies" and correct "wasps ans yellow jackets" to "wasps and yellow jackets". At the end of this section add: "Do not spray lawns, desirable plants, or shrubbery with this product."
- 10) In the directions for crack and crevice application in food handling establishments, replace "using equipment capable of delivering a pin stream of insecticide" with "using an injection or insertion tube". Presumably, such a tube is already included with this aerosol product as marketed. Please confirm this.

- 11) Revise the "Hazards to Humans and Domestic Animals" section to read as follows (this incorporates the above revisions, as well as the results of the toxicology studies on the product that you indicated your product is based upon):

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling, and before smoking or eating. May cause contact sensitization following repeated contact with skin in susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. Do not spray household pets or humans with this product. Do not allow children or pets to contact treated surfaces until spray has dried.

- 12) In the "Statement of Practical Treatment", revise the last sentence of the "If Swallowed" advice to read "Do not induce vomiting or give anything by mouth to an unconscious or convulsing person."
- 13) At the end of the "Statement of Practical Treatment", add the following "Note to Physician":

**Note to Physician:** This product contains an organophosphate insecticide. 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.

- 14) Revise the "Environmental Hazards" section to read as follows:

This pesticide is highly toxic to birds, fish, and other wildlife. Birds feeding or drinking on treated areas may be killed. Keep out of lakes, streams ponds, tidal marshes, and estuaries. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water by disposal.

This pesticide is highly toxic to bees exposed to direct treatment or residues on blooming plants where they feed. Do not allow this pesticide to drift to blooming plants if bees are visiting the treatment area. Do not apply this product to or allow it to drift to food crops or any desirable vegetation at any time.

Labeling released for shipment after the August 31, 1992 deadline imposed by the Diazinon Registration Standard, as amended, must bear the above revisions. Your label should not include the quotation marks that appear around text specified in this letter. Please submit five copies of the revised label when it becomes available.

Sincerely yours,

George T. LaRocca  
Product Manager (13)  
Insecticide Rodenticide Branch  
Registration Division (H7505C)

**859 Aqueous Roach & Ant Spray with Diazinon\***

**Directions for Use:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **Shake Well Before Use.** To operate hold can upright, direct nozzle toward the surface to be treated, and press the actuator button. Do not use as a space spray.

To kill ants, carpenter beetles, centipedes, cockroaches, crickets, earwigs, firebrats, pillbugs, silverfish and spiders, thoroughly apply as a spot treatment to areas where these pests are found or may hide, including dark corners of rooms and closets, cracks and crevices, under carpets, along baseboards and door sills and frames, behind and beneath sinks, stoves, refrigerators, and cabinets and around garbage cans, plumbing and other utility installations. Pests driven out of hiding places should be sprayed directly. Spray ant trails, nests and points of entry.

To kill fleas and brown dog ticks, Apply thoroughly as a spot treatment to infested areas such as pet beds and resting quarters, and nearby cracks and crevices, along and behind baseboards, window and door frames and localized areas of floor and floor covering where these pests may be present. Fresh bedding should be placed in animal quarters following treatment. Do not spray pets with this product.

To control house flies, gnats, hornets, mosquitoes, smothering moths, wasps and yellow jackets, use only on outdoor surfaces. Spray outside surfaces of window and door frames and other areas where these pests may enter the home. Also spray dark corners and localized resting areas such as under eaves, porches, pergolas and in garages where these insects may congregate. Flies and mosquitoes tending to rest on treated surfaces will be killed. Repeat treatment when effectiveness diminishes.

**APPLICATION OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS OTHER THAN AS A SPOT AND/OR CRACK AND CREVICE TREATMENT IS NOT PERMITTED**

**Application Within Food Handling Establishments (Places other than private residences in which exposed food is held, prepared, prepared or served including, but not limited to areas for receiving, storage, packing, canning, bottling, wrapping, sealing, preparing foods, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) and serving areas (when food is exposed and facilities in operation):** Use as a crack and crevice treatment in and around both food and nonfood areas to control ants, cockroaches, crickets, silverfish, spiders and waterbugs. Apply in small amounts directly into cracks and crevices using equipment capable of delivering a fine stream of insecticide in points between different elements of construction between equipment and floor openings leading to voids and hollow spaces in walls, equipment legs and bases. Do not use on product in conduits, motor housings, junction or switch boxes. Prior to application de-energize electrical equipment. Limit spot treatments to floor surfaces where pests have been seen or where they are suspected of hiding. Limit individual spot treatments to an area no larger than 20% of the floor area. An individual spot treatment shall not exceed 2 square feet.

Individual spot treatments shall not exceed two square feet. Do not apply to areas, surfaces, or items which will come in contact with food. Take extreme care to avoid contamination of food or food contact surfaces or introducing the material into the air.

**Application Within Food Serving Areas (facilities where foods are served such as dining rooms, but excluding areas where food may be prepared or held):** Apply as a spot treatment to selective surfaces, such as baseboards, under elements of construction and into cracks and crevices. Avoid treating surfaces likely to be contacted by food. Do not apply when facility is in operation or foods are exposed.

**Precautionary Statements:  
Hazards to Humans and Domestic Animals  
CAUTION**

**Harmful if swallowed. Keep out of reach of children. Avoid breathing spray mist.**

Use only in a well-ventilated area. Avoid skin and eye contact. May cause contact sensitization following repeated contact with skin in susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. Wash thoroughly after handling and before eating or smoking. Do not use children or pets to contact treated surfaces until spray has dried. Do not use if this pesticide is in the immediate area when occupants are present. Do not spray in a pest case when classrooms are in use. Do not spray in rooms or use in plants. Apply to a surface spray only. Do not use spray to contact food, feedstuffs or water supplies. Thoroughly wash dishes and food handling utensils contaminated with this product. Remove pets and cover fish aquariums before spraying.

**STATEMENT OF PRACTICAL TREATMENT**  
**If Swallowed:** Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.  
**If on Skin:** Remove contaminated clothing and wash affected areas with soap and water. If in Eyes: Flush eyes with plenty of water. Call a physician if irritation persists.  
**If Inhaled:** Remove victim to fresh air. Apply artificial respiration if indicated.

**ENVIRONMENTAL HAZARDS**  
This product is toxic to fish, birds and other wildlife. Birds and waterfowl feeding or drinking in treated areas may be killed. Avoid over-spraying of sprays. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Snails and crabs may be killed at application rates recommended on this label. Do not apply this product where fish, shrimp, crab or other aquatic life are important resources. Apply this product only as specified on this label. This pesticide is highly toxic to bees exposed to direct treatment or to residues on flowering plants where they feed. Do not use this pesticide to drift to flowering plants if bees are visiting the treated area. Do not apply this product or allow it to drift to food crops or any desirable vegetation at any time.

**PHYSICAL HAZARDS**  
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.

**STORAGE AND DISPOSAL**  
**STORAGE:** Store in a cool, dry area inaccessible to children and pets. Do not transport or store below 32°F. Exposure above 130°F may cause bursting.  
**DISPOSAL:** Mix with water or in a double layer of newspaper and dispose of in trash. Do not incinerate or puncture.

**Important Note:** Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

**SHERWIN WILLIAMS** **SPRAYON PRODUCTS**  
Industrial Supply  
Division of The Sherwin-Williams Company  
Bedford Heights, Ohio 44115 • Anaheim, Calif. 92805 **859**

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# Aqueous Roach & Ant Spray with Diazinon\*

For Commercial/Industrial Use

Pyrethrin\* provides flushing action and fast kill. Ants, Spiders, Ticks, and other insects listed on label and around Homes, Apartments, Garages, Motor Homes, Food Processing Plants. A residual insecticide which remains effective for up to two weeks. Use outdoors as an aid in reducing Mosquitoes entering the home.

Active Ingredients

Pyrethrins	.....
*Piperonyl Butoxide	.....
Diazinon [0,0-Diethyl 0-(2-Isopropyl-6-methyl-pyrimidinyl)phosphorothioate	.....
Inert Ingredients	.....

\* Equivalent to 0.238% (butyrcarbityl) (6-piperonyl) and 0.052% related compounds.  
\*\* Contains Petroleum Distillate  
Pyrethrin\* — Registered Trademark of FMC  
Diazinon\* — Registered Trademark of The Dow Chemical Company  
EPA Reg. No. 10900-68

# Spray

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
HARMFUL IF SWALLOWED  
AVOID CONTACT WITH EYES  
See side panel for additional information and practical treatment suggestions.

16 oz • 454 g

FEB - 7 1992

10900-68