

15 JAN 1992

Sumitomo Chemical America, Inc.  
c/o Dr. Robin Todd  
1330 Dillon Heights Avenue  
Baltimore, MD 21228

Dear Dr. Todd:

Subject: Revised Labeling  
2% d-Phenothrin Insecticide Aerosol  
EPA Reg. No. 39398-1  
2% Sumithrin Total Release Insecticide, Aerosol  
EPA Reg. No. 39398-2  
Insecticide Aerosol d-Phenothrin  
EPA Reg. No. 39398-5  
Pesguard NS 4/1 WB  
EPA Reg. No. 39398-10  
Submission dated January 9, 1992

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. ~~Five copies of the finished labeling must be submitted prior to releasing the product for shipment.~~

1) In the Precautionary Statement paragraph, the "Hazards to Humans" section requires that you indicate the precaution to be taken to avoid injury or damage and to indicate the appropriate first aid statement for the hazard. As new labels are prepared, modify this precaution in accordance with 40 CFR 156.10(h)(2)(i). The following may serve as an example.

#### STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately.

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

IF ON SKIN  
OR CLOTHING: Remove contaminated clothing and wash before reuse. Wash skin with soap and warm water. Get medical attention if irritation persists.

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

2) Submit a revised Confidential Statement of Formula for EPA Reg. No. 39398-2.

You should be advised that two of the ingredients in your products (Freon 11 and Freon 12) have been identified as Class I substances under Title VI of the Clean Air Act, 1990 amendments. Based upon this Act, Congress has implemented provisions to protect the stratospheric ozone layer from deterioration. Many currently registered products as well as new applications for registration will ultimately be affected by this Act. Any questions concerning this issue are welcomed by the Agency.

Sincerely,

*RFM*  
Richard F. Mountfort  
Product Manager (10)  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)



# 2% SUMITHRIN® Total Release Insecticide, Aerosol

## PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS

## CAUTION

Harmful if swallowed. Do not use in commercial food serving areas while food is exposed. Do not contaminate food or foodstuffs.

## 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° may cause bursting.

## STORAGE AND DISPOSAL

### STORAGE

Store in a cool, dry area.

### DISPOSAL

Do not re-use empty container. Securely wrap in several layers of newspaper and discard in trash.

For PUBLIC HEALTH, PLANT PROTECTION and QUARANTINE PESTS in AIRCRAFT

## ACTIVE INGREDIENTS:

3-phenoxybenzyl (1RS, 3RS; 1RS, 3SR) -2, 2-dimethyl -3 (2-methyl-prop-1-enyl) cyclopropanecarboxylate ..... 2.00%

INERT INGREDIENTS:..... 98.00%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

**SEE SIDE PANEL FOR PRECAUTIONARY STATEMENTS**

## NOTICE — READ CAREFULLY

Sumitomo (and seller) offer(s) this product for sale subject to, and buyer and all users are deemed to have accepted, the following conditions of sale and warranty which may only be varied by written agreement of a duly authorized representative of Sumitomo.

### WARRANTY LIMITATION:

Sumitomo warrants that this product conforms to the chemical description in the directions for use on the label subject to the inherent risks referred to below. Sumitomo makes no other express warranties. THERE IS NO IMPLIED WARRANTY OF MERCHANTABILITY and there are no warranties which extend beyond the description of the label hereof.

## DIRECTIONS FOR USE

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

## FOR USE ON AIRCRAFT

To kill Mosquitoes, Gnats, Houseflies, etc. As the aircraft starts taxiing for takeoff, while standing at cockpit door and wing level of the aircraft. During discharge, the nozzle pointing away from the aircraft. Discharge from side to side to aid distribution.

Use at the rate of 10 grams/1000 cubic feet.

Number of units required for various types of aircraft:

Type	Approx. cu. ft.
DC 9	3500
BAC 111	3500
B 727	5000
B 707	8000
DC 8	8000
B 747	39000

## CONDITIONS OF SALE

### INHERENT RISKS:

The directions for use of this product should be followed carefully. However, you should evaluate all risks associated with use. Be aware of the inherent risks associated with use or application of this product and resulting from extraordinary conditions.

### LIMITATION OF LIABILITY:

In no case shall Sumitomo be liable for consequential damages resulting from the use of this product and no claim of any kind shall be granted against Sumitomo in excess of the purchase price of the product in respect of which the claim is made.

ACCEPTED  
 with COMMENTS  
 In EPA Letter Dated  
 15 JAN 1992  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 registered under EPA Reg. No.  
 39398-2