Ms. Carolyn Bussey Ciba-Geigy Corporation F.C Box 18300 Greensboro, NC 27419

APR | | 1990

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Dear Ms. Bussey:

SUBJECT: Amendments - Reformat label, and Revisions per Registration Standard D.z.n Home Pest Control, Pressurized EPA Reg. No. 100-478 Your submission received January 20, 1990

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

1) Revise the first-two-items of the "Presentions" to read as follows

1) Do not use this product indoors as an overall surface spray or as a space spray; take care not to introduce this product into the air during application. 2) Use only in well-ventilated areas.

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- 2) In number 14 of the "Precautions", revise "or other places" back to "or other areas". Re-add "Do not use in serving areas while food is exposed." at the end of item 14 of the precautions.
- 3) It is noted that this label does not bear the precaution "Do not use this product in conduits, motor housings, or electrical match boxes.", as appears on your label for D.s.n-Home Peet Control. Is this omission deliberate? If not, then add this as item "15" of the Indoor Use precautions. If use in these sites is intended, then there must be a warning to de-energize the electrical circuit before spraying in such locations. Also, after application, time must be allowed for the oil to evaporate before starting motors or placing switches in the "ON" position.



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4) In the Indoor Applications section of the label, the listings should be consolidated, since the currently separate "Surfaces behind and beneath cabinets" site is already included in the directions under the rest category "Cockroaches, etc.". The Agency recommends the following revised text, which incorporates directions and precautions from both current sections and is identical to the latest approved text for D.z.n Home Pest Control (EPA Reg. No. 100-477):

Cockroaches (Waterbugs), Ants, Firebrats, Silverfish, Sowbugs (Pillbugs), Springtails, Spiders, Crickets, and Farwigs: As a supplement to good housekeeping, spray until wet surfaces behind and beneath cabinets, refrigerators, sinks, and stoves, as well as ant trails and other localized areas where insects tend to hide. Discard infested food packages, but do not not spray inside cabinets where food is stored. Spray window and door frames where ants enter. Treat difficult to service locations such as voids around water pipes, and cracks and crevices along baseboard moldings. Repeat as necessary.

- 5) In the directions for indoor control of brown dog ticks, revise "Do not treat animals." to "Do not treat animals with this product.".
- 6) In the directions for use outdoors on chiggers, etc., delete "where there is no vegetation to be used for food or feed". The limitation to not spray lawns or other desirable plants is more inclusive and would cover the category "vegetation to be used for food or feed".
 If you feel more explanation to the user is necessary, you could expand the limitation to something like "Do not apply to lawns or other desirable plants, including those to be used for food or feed.".
- 7) In the last sentence of the Hazards to Humans & Domestic Animals, revise "Do not allow children..." to "Do not allow children or pets...".
- 8) Pevise the Environmental Hazards text 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 or wetlands (swamps, bogs, marshes, and potholes). 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.

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9) The Agency does not understand the reason given in your cover letter for the deletion of the phrase "2-Way nozzle - spray or stream" from the front of the label. While, of course, you are free to delete this phrase if it is no longer true, your October 19, 1989 letter cites as the reason for deletion "since the product is pressurized, the container does not have a 2-way nozzle". The more fact that it is pressurized would not preclude having a 2-way nozzle. Other pressurized pesticide products utilize 2-way nozzles. Also, on July 13, 1979, Cita-Giegy notified the Agency that due to a change in the formula (copy of that cover letter enclosed), the 2-way nozzle was usable and thus would be included in future production of this pressurized product. Labeling incorporating the 2-way nozzle phrase was approved by the Agency on July 19, 1979. Since the product was pressurized but still capable of using the 2-way nozzle at that time and for 10 years afterward, the Agency does not understand why now the fact that the product is pressurized is reason for not using the 2-way nozzle. Please clarify.

A stamped copy of the label is enclosed for your records. Please submit five (5) copies of the finished amended label, incorporating the above revisions, prior to release for shipment under the amended label. Please refer to the Diazinon Registration Standard, as amended, for release for shipment and channels of trade dates for diazinon products bearing appropriately amended labels.

Sincerely yours,

George T. LaRocca Product Manager (15) Insecticide-Rodenticide Branch Registration Division (H7504C)

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Home Pest Control, Pressurized	
Insecticide	
For use in and around the home	ACCEPTED
For control of:	with COMMENTS in EPA Letter Dated:
Cockroaches Ants, Silverfish	APR 1 1 1990
Brown dog ticks Spiders	Under the Federal Insuticide,
Spiders Crickets, Earwigs	Fun jeid, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.
Sowbugs, Flies	
Mosquitoes Flying moths	100-478
Wasps	
and other insects as specified in label directions	
Active Ingredien s: Diazinon: 0,0-Diethyl 0-(2-isopr methyl-4-pyrimidinyl) phosphoroth	hioate 0.500%
Pyrethrins Technical piperonyl butoxide (equivalent to 0.209% [butyl-	0.052%
carbityl][6-propylpiperonyl] ether and 0.052% other related	
	<u>.</u>
compounds) Inert Ingredients:*	99.187%
Total:	100.000%
*Contains petroleum distillate.	
For use in and around the home	
For use in and around the home. No unpleasant odor.	
For use in and around the home. No unpleasant odor.	
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No unpleasant odor.	• • •

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DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire <u>Directions for Use</u> and the <u>Conditions of Sale and Warranty</u> before using this product. If terms are not acceptable, return unopened product container at once.

Conditions of Sale and Warranty

The <u>Directions for Use</u> of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of CIBA-GEIGY or the Seller. All such risks shall be assumed by the Buyer.

CIBA-GEIGY warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. <u>CIBA-GEIGY makes no other express or</u> implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall CIBA-GEIGY or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. CIBA-GEIGY and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing <u>Conditions of Sale and Warranty</u>, which may be varied only by agreement in writing signed by a duly authorized representative of CIBA-GEIGY.

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DIRECTIONS FOR USE

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

General Information

 $D \cdot z \cdot n$ Home Pest Control Pressurized is a ready-to-use product in a ready-to-use pressurized container. Hold the container upright and lightly spray surfaces until wet according to the directions for use. This product may be used inside and outside the home for control of the pests specified on this label.

INDOOR USE

Controls:

Cockroaches (waterbugs), ants, firebrats, silverfish, brown dog ticks, springtails, spiders, crickets, earwigs, sowbugs (pillbugs), carpet beetles.

Precautions: 1) Do not use this product indoors as an overall surface spray or as a space spray. 2) Take care not to introduce this product into the air during application; use only in well-ventilated areas. 3) Do not apply where children are likely to frequently contact treated surfaces. 4) Remove or cover fish bowls and remove pets before application. 5) Do not treat pets or plants with this product. 6) Do not allow children or pets in treated areas until spray has dried. 7) If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again. 8) Do not apply directly to carpets or floor coverings and avoid excessive wetting of asphalt tile, rubber and plastic materials because damage may occur. 9) Care should be taken to avoid spotting of walls, wall coverings, and fabrics. 10) Do not apply directly to upholstery or furniture. 11) Do not apply to areas, surfaces, or utensils which will contact food or feed. 12) Exposed food should be covered or removed during applica-13) All food processing surfaces and itensils should be tion. covered during application or thoroughly washed with soap and water before use. 14) Do not use in edible product areas of food processing plants, restaurants, or other places where rood or feed is commercially prepared or processed.

Application

<u>Cockroaches (Waterbugs), Ants, Firebrats, Silverfish, Sowbugs</u> (Pillbugs), Springtails, Spiders, Crickets, Earwigs: Spray until wet, surfaces behind and beneath cabinets, refrigerators, sinks, stoves, ant trails, and other localized areas infested with insects. Spray window and door frames where ants enter. Treat difficult to service locations such as voids around water pipes and cracks and crevices along baseboard moldings. Repeat as necessary.

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<u>Carpet beetles</u>: Make localized application to areas of the floor and baseboards. Spray directly into cracks and under carpets where insects may be found. Treat crevices, cracks, and infested areas of shelving in closets. Repeat as necessary.

Brown dog ticks: Spray infested areas around baseboards, window and door frames, wall cracks, sleeping quarters of pets, and localized areas of floors and floor coverings. Repeat as necessary. Fresh bedding should be placed in animal quarters after treatment. Do not treat animals.

<u>Spiders</u>: Apply spray around windows, doors, and along baseboards. Make spot applications to other areas over which these pests may crawl.

Surfaces behind and beneath cabinets: Roaches, ants, silverfish - as a supplement to good housekeeping, spray surfaces behind and beneath cabinets where insects tend to hide. Spray until wet. Do not spray inside cabinets where food is stored.

OUTDOOR USE

Controls:

Flies, Mosquitoes, Wasps, Flying Moths, Chiggers, Ants, Brown Dog Ticks, Clover Mites.

Precautions: 1) Spray with wind to your back. If clothing becomes wet from spray during use, remove clothing after spraying, wash affected body areas thorough with soap and water, and launder clothing before wearing again. 2) Do not allow children or pets to contact treated areas until spray has dried. 3) Do not apply to lawns or other desirable plants.

Application:

<u>Flies, Mosquitoes, Wasps, Flying moths</u>: For outdoor use only as an aid in reducing annoyance from these insects. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter. Treat dark corners and localized resting areas, under eaves, on porches, around patios, and garages. Repeat as necessary. Also treat surfaces around light fixtures on porches, in garages, and other places where these insects alight or congregate.

Chiggers, Ants, Brown dog ticks, Clover mites: For treatment of localized infestations of insects in outdoor areas where there is no vegetation to be used for food or feed, spray infested areas. Do not apply to lawns or other desirable plants. For ants, wet hills and runways. Repeat as necessary.

Porches, Patios, Garages, and other areas around the house where insects hide and congregate: To help keep flies, mosquitoes, wasps, and flying moths from entering the house, treat outdoor areas where these insects congregate. This treatment can be an effective addition to total pest control.

Storage and Disposal

Storage:

Keep away from fire, sparks, and heat. See "Physical or Chemical Hazards" for additional precautions. Store in an area inaccessible to children and pets.

Disposal:

Do not reuse empty container. Do not puncture or incinerate container. Wrap container and put in trash collection.

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled, or absorbed through skin. Avoid inhalation and skin contact; wash thoroughly after using and before eating or smoking. May cause contact sensitization following repeated contact with skin of susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. Avoid contamination of feed and foodstuffs. Do not use on household pets or humans. Remove pets from area, and cover fish bowls before spraying. Do not allow children in treated areas until surfaces have dried.

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Statement of Practical Treatment

If swallowed, call a physician immediately. DO NOT INDUCE VOMITING UNLESS NO OTHER TREATMENT IS AVAILABLE. Vomiting may cause aspiration pneumonia. If it is necessary to induce vomiting, give victim one or two glasses of water and insert finger in back of throat. Do not induce vomiting or give anything by mouth if person is unconscious or convulsing.

If inhaled, remove victim to fresh air and apply artificial respiration if indicated.

If on skin, wash promptly with soap and water. Rinse thoroughly.

If in eyes, rinse eyes with plenty of water and call a physician immediately.

Note to Physician: This product is 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. Product contains xylene range aromatic solvent, which may present an aspiration hazard. Gastric lavage is indicated if product was taken internally.

Environmental Hazards

This product is toxic to fish, birds and wildrife-includingwaterfowl. Birds feeding in treated area may be killed. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not apply when weather conditions favor drift from untreated areas. Do not apply this product where fish, shrimp, crab or other aquatic life are important resources.

Physical or Chemical Hazards

Extremely flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. EPA Est. EPA Reg. No. 100-478 D.z.ne trademark of CIBA-GEIGY for diazinon ©1989 CIBA-GEIGY Corporation Agricultural Division CIBA-GEIGY Corporation Greensboro, North Carolina 27419 CGA A1L17G March 4, 1977 February 21, 1979 Revised July 9, 1979 Revised July 18, 1979 February 4, 1980 Revised Revised May 28, 1980 Revised May 27, 1981 Revised July 23, 1981 Revised October 12, 1982 Revised December 9, 1988 Accepted Data Call-In revisions - © date, changed product name to $D \cdot z \cdot n$, moved petroleum distillates from a.i. to inerts, revised Note to Physician. October 10, 1989 -Revised Reg. Standard & Changes

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(LABELS-D.4 - DZN/HPC-P)