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FILE COPY

Ciba Plant Protection Ciba-Geigy Corporation P.O. Box 18300 Greensboro, NC 27419-8300

Attn: Carolyn Bussey

Subject: Proposed Signal Word and Precautionary

Labeling Change and Formulation Change

Torus 2E

EPA Registration No. 100-724

Application dated December 1, 1992

Dear Ms. Bussey:

The proposed amendments referred to above, submitted in connection with registration under The Federal Insecticide, Fungicide, And Rodenticide Act, as Amended are acceptable subject to the comments listed below:

- 1) The acute oral, acute dermal, acute inhalation, eye irritation, and dermal irritation studies are acceptable as core guideline data. The dermal sensitization study is not acceptable and cannot be upgraded. An acceptable dermal sensitization study must be submitted. Refer to the enclosed review for comments regarding this study.
 - 2) Based on the acute data the label must be revised as follows:
 - a) The appropriate signal word is "WARNING".
 - b) The Precautionary Statements must read as follows:

"Causes substantial but temporary eye injury. Harmful if swallowed, inhaled, or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin and breathing vapor or spray mist. Wear goggles, face rhield, or safety glasses when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse."

c) The Statements Of Practical Treatment must read as follows:

"IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water. Get medical attention.

IF SWALLOWED: Drink promptly a large quantity of milk, eggwhites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol. Do not induce vomiting.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Get medical attention.

3) Additional statements may become required after the dermal sensitization study has been submitted and reviewed.

The Confidential Statement Of Formula(CSF) is acceptable and has been placed into the file for this product.

A stamped copy of the draft label is enclosed for your records. Submit five copies of the final printed label before the product is released for shipment under this revised label.

Sincerely,

Adam Heyward

Acting Product Manager 10 Insecticide & Rodenticide Branch Registration Division (H7505C)

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Proposed Label "Caution" Signal Word (Changes are in boldface type)

TORUSR

Insect Growth Regulator for Extended Insect Control

(Insect Growth Regulator for Use in Homes, Apartments, and Other Buildings, in Non-Food Preparation Areas of Food Handling Establishments, and Outdoors Around Buildings and in Pet Areas)

Active Ingredient:

Fenoxycarb: (Ethyl [2-(4-phenoxyphenoxy)ethyl]

Contains petroleum solvents

EPA Reg. No. 100-724/ EPA Est. 602-MO-1

KEEP OUT OF REACH OF CHILDREN

DANGER

See additional precautionary statements at end of label.

15 x 0.33 fl. oz. (15 x 10 ml) U. S. Standard Measure

CIBA-GEIGY

ACCEPTED
with COMMENTS
in EPA Letter Dated

, cup 5 | 1860

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the posticide registered under EPA Reg. No.

100-724

DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

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

Conditions of Sale and Warranty

The Directions for Use 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 <u>Directions for Use</u> subject to the inherent risks referred to above. <u>CIBA-GEIGY makes no other express or 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 Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of CIBA-GEIGY.</u>

DIRECTIONS FOR USE

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

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR INSECT CONTROL OR ILLEGAL RESIDUES.

General Information

Torus will control cockroaches, fleas and certain stored food pests in homes, apartments and non-food preparation areas of industrial, institutional and commercial buildings including but not limited to: hotels, hospitals, restaurants, stores, manufacturing plants, warehouses, transportation equipment, and ships.

Torus may also be used outdoors as a perimeter treatment around buildings to control cockroaches and in animal runs, resting areas and kennels to control fleas.

Note: Do not apply Torus in serving areas of restaurants while food is exposed. Avoid contamination of food, feedstuffs or water supply.

Torus kills flea eggs, and treated larvae fail to emerge as adult fleas. Torus has excellent residual effect indoors, lasting six months or more depending on the material treated, frequency of cleaning, and environmental conditions. Outdoor treatments should be repeated as needed.

Torus acts on the immature growth stages of cockroaches, killing young instar nymphs by disrupting molting. Torus WP prevents the development of last-stage nymphs into fertile adults.

Torus acts on stored-food pests as an ovicide and prevents the larvae from becoming adults. Torus will control: granary weevil, rice weevil, sawtoothed grain beetle, red flour beetle, confused flour beetle, lesser grain borer, cigarette beetle, Indian meal moth, angoumois grain moth, warehouse moth, and mill moth.

Torus will not kill adult insects. If adult insects are present, Torus WP should be combined with an insecticide registered for control of the adult stage of the target insect(s). Torus complements the rapid activity of the insecticide by providing long-term control.

Torus System - Application Rates

Pest	Type of Application	Amount of Torus /gal. of water	Specific Directions
Cockroaches	Clean Out	20-30 ml	For high infestations, use 30 ml; for light
	Maintenance	20 ml	infestations
	Perimeter	20 ml	20 ml.
Fleas	Indoor Outdoor	10 ml 10 ml	Outdoors, apply 10 ml Torus to approximately 300-350 sq. ft. in sufficient water to cover.
Stored Food Pests	Maintenance	20 ml	

Mixing Procedure

Make sure sprayer is clean before mixing. to mix Torus, partially fill the sprayer with water, add the correct amount of Torus for the sue specified in the table and agitate. Add the labeled rate of the insecticide selected and fill with water to the final volume. Agitate before each spray. Do not allow spray mixture to stand overnight.

Application Precautions

Do not allow spray mist to contact food, feedstuffs or water supplies. Dishes and food-handling utensils should be thoroughly washed in soap and water if exposed to contamination by the application of the product. Do not allow children or pets to contact treated surfaces until spray has dried. DO NOT USE IN FOOD PREPARATION AREAS OF COMMERCIAL FOOD-HANDLING ESTABLISHMENTS.

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Torus System Application Procedure

Cockroaches

Clean Out:

Apply as a crack and crevice spray and/or a spot treatment with a low pressure sprayer equipped with a multitip nozzle. Apply to all areas that harbor cockroaches, including behind cupboards, pantries, under shelves and drawers, behind and under stoves, refrigerators, and other large appliances; under sinks, baseboards, window frames, plumbing and other utility installations.

- 1. Initial application: Use the clean out rate. Empty all cabinets and drawers prior to application.
- Second application: Apply the maintenance rate 6-8 weeks after the initial application, depending on the residual insecticide used.
- 3. Subsequent applications: Apply the maintenance rate every 3-4 months.

Perimeter Treatments

Apply in a band 2 to 4 feet adjacent to and around the structure and apply to a height of 2 to 3 feet on the foundation where pests may be active or may find entrance. Apply as a residual spray around window frames, doors, garage doors, patios, carports, shutters, around garbage areas and other areas where cockroaches may congregate. Avoid spraying into the air.

Food Serving Areas

Torus WP can be used where prepared foods are served, such as dining rooms, but excluding areas where food is being held or prepared.

Apply as a crack and crevice and/or spot treatment to infested areas or areas likely to be infested and between and beneath . elements of construction only. Dishes and food handling utentils should be thoroughly washed in soap and water if exposed to contamination. Do not apply in serving areas of restaurants while food is exposed.

Fleas

Prior to treatment, carpets should be vacuumed and the vacuum cleaner bag disposed of in an outdoor trash receptacle. Pet bedding should be replaced or washed in hot water. To control the source of infestation, pets should be treated with a product registered for on-animal flea control.

Indoor

Mix one gal. of finished spray to approximately 1,500 sq. ft. of surface area, using a low pressure sprayer suitable for indoor applications. Treat all areas that may harbor fleas, including carpets, furniture, pet sleeping areas and throw rugs. Treat under cushions of upholstered furniture. Avoid contact with treated areas until spray has dried. Remove pets and cover aquariums prior to treatment.

Outdoor

To control fleas outdoors apply Torus to animal runs and areas where the animals rest. Also, if animals are kenneled, apply Torus WP in and around the kennel area. Apply the recommended rate to 300 to 350 square feet in sufficient water to obtain good coverage. Repeat as needed.

Stored Food Pests

For Use in the Home

Apply as a crack and crevice and a spot treatment to pantry and cupboard shelves where food containers are stored. Prior to spraying remove all food containers and food stuffs, any shelving paper and utensils. Do not replace food or containers until spray has dried. Destroy infested food packages.

For Use in Warehouses and Commercial Food Storage Areas

Prior to application, sweep all floors of debris, and pick up all litter. Application should be made as a crack and crevice and/or spot treatment. Apply to all areas that may harbor pests. Apply under and between pallets.

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal:

Pesticide Storage Store in a locked storage area away from children. Store away from heat sources or open flame. Pesticide Disposal Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal

Do not reuse container. Triple rinse container, then dispose of in a sanitary landfill or dispose of by other approved state and local procedures.

Note: Soak up spills with absorbent material and dispose of absorbent in accordance with pesticide disposal instructions. For minor spills, leaks, etc. follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup and disposal of wastes. In the event of a major spill, fire, or other emergency, call 1-800-888-8372 day or night.

Precautionary Statements Hazards to Humans and Domestic Animals

CAUTION

Harmful if inhaled or absorbed through the skin. Causes moderate eye skin irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Statement of Practical Treatment

If on skin: Wash with plenty of soap and water. Get medical attention.

If in eyes: Flush eyes with plenty of water. Call a if irritation persists.

Environmental Hazards
This product is toxic to fish and aquatic invertebrates. Drift and runoff from treated sites may be hazardous to aquatic invertebrates in adjacent aquatic sites. 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 when disposing of equipment wash water.

Physical or Chemical Hazards
To avoid electrical shock or short circuits, do not apply in areas such as conduits, motor housings, junction and switch boxes, and other electrical equipment.

Do not store or use near heat or open flame

Torus^R trademark of CIBA-GEIGY Corporation U.S. Patent 4,215,139

c1992 CIBA-GEIGY Corporation

Animal Health Division CIBA-GEIGY Corporation Greensboro, North Carolina 27419

CGA 120L1

Oct. 23, 1992 - changed signal word and precautionary statements