

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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NOV 27 1991

Miles Inc.
Consumer Household Products Division
C/O JOHN W. KENNEDY CONSULTANTS, INC.
9101 Cherry Lane, Suite 113
Laurel, Maryland 20708-113

Dear Sir:

Subject: Addition of Label Claim (Add Residual Claim)
LASER Ant and Roach Killer II
EPA Registration Number 121-40
Your Amended Application Dated March 18, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable, provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

1a). Add the following statement under Directions For Use:

"DO NOT SPRAY ON FRESHLY PAINTED SURFACES".

1b). Add a statement to the effect that more frequent applications may be required to maintain adequate control where painted wood forms a significant portion of the surface area to be treated.

The data submitted (MRID NO. 418435-01) are adequate to support the claim for residual effectiveness of the subject product against cockroaches on glazed and unglazed ceramic tile, plywood (unpainted), no-wax vinyl and formica surfaces when applied according to label directions. We also, agree that S.C. Johnson test number WR90247 demonstrates extended residual control on aged painted plywood and aged vinyl surfaces and helps to explain efficacy failure on these surfaces as reported in test number WR86799 as being due to improper aging of panels prior to application. We nevertheless have some reservations as to residual persistence of the subject product on painted plywood and the likelihood that it will remain effective for up to 17 weeks. Note that in WR90247 the subject product was highly effective on painted plywood for only the first day, and that on a surface aged 14 years.

CONCURRENCES

SYMBOL	H7505C						
SURNAME	A. J. Howard						
DATE	11/26/91						

The data presented in MRID NO. 418435-02 are adequate to demonstrate effectiveness against American cockroaches and German cockroaches and thus support a general roach claim and persistence of activity for 30 weeks. However, the 24-hour confinement of Lucite ring tests is poorly suited to resolve the question of field persistence on painted wood and in lieu of minimal field testing, the statements must be added to the labeling:

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely,



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

CC: Miles Incorporation
Consumer Household Products Division

LASER®*
ANT & ROACH KILLER II

Contains Cylathrin®**

KEEPS KILLING FOR UP TO FOUR MONTHS

KILLS FAST

KILLS LONG

ACCEPTED
with COMMENT
in EPA Letter D...

NOV 27

Under the Federal Insecticide, Fungicide, and Rodenticide Act, extended for the registration of EPA...

121-40

ACTIVE INGREDIENTS:

**Cyfluthrin [Cyano-(4-fluoro-3-phenoxyphenyl)-methyl-3-(2,2-dichloroethenyl)-2,2-dimethyl-cyclopropanecarboxylate]	2.15%
2-(1-Methylethoxy)phenol methylcarbamate	0.10%
Technical Piperonyl butoxide ⁺	1.00%
Pyrethrins	0.05%

INERT INGREDIENTS:

97.85%

Contains Petroleum Distillates

+[Equivalent to 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% related compounds.]

*LASER® and **Cylathrin® are registered trademarks of:

MILES INC.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FOR HOUSEHOLD USE ONLY

SEE DIRECTIONS AND CAUTIONS ON BACK

NET WT. 11 OZ.
(Second size 15 oz.)

EPA Reg. No. 121-40
EPA Est. Nos. 7056-TX-1, 54487-GA-1, 11715-TN-1

LASER®*
ANT & ROACH KILLER II

PLEASANT SCENT

Kills the insects you see, kills the ones you don't see. Begins killing instantly, kills ants and roaches in seconds.

-Kills with residual action.
Only LASER® has CYLATHRIN®

PRECAUTIONARY STATEMENTS:

CAUTION: HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if absorbed through the skin. Avoid contact with the skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENTS OF PRACTICAL TREATMENT:

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

IF SWALLOWED: Contains petroleum distillate. Call physician or poison control center immediately. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

PHYSICAL/CHEMICAL HAZARDS:

Flammable. Contents under pressure. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

LASER[®]*
ANT & ROACH KILLER II

DIRECTIONS FOR USE:

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

DO NOT USE AS A SPACE SPRAY. Hold container upright while spraying. Direct nozzle about 12 inches from surface to be treated. Spray away from self and other persons. Do not allow children in treated area until spray has dried.

DO NOT USE in food processing plants, restaurants, or other areas where food is commercially prepared or processed. DO NOT USE in serving areas while food is exposed.

REMOVE birds and tightly COVER fish bowls and aquariums in area being sprayed. Do not allow pets in treated area until spray has dried. Do not spray on plants or shrubbery.

TO KILL: ROACHES, WATERBUGS, PALMETTO BUGS, CRICKETS, SPIDERS, AND MILLIPEDES.

Spray around baseboards, into cracks and crevices and other inaccessible places where insects live and hide (under sinks, cabinets, refrigerators, damp areas, etc.) until surfaces are wet. Spray directly on insects if possible. Avoid excessive wetting of linoleum, asphalt tiles or plastics. DO NOT spray open floor areas, carpets, furniture, beds or bedding.

TO KILL: ANTS, SNOWBUGS AND EARWIGS

Spray around door and window frames and other places where these insects may enter house. Spray around foundations and porches. Spray on ant trails and ant hills. DO NOT treat open areas of floor or floor coverings.

FOR LONG LASTING RESIDUAL ACTION allow residue to remain undisturbed as this product will keep on killing for weeks.

STORAGE: Store in area away from heat and flame in area inaccessible to children.

DISPOSAL: Do not reuse empty container. Discard in trash. Do not incinerate or puncture.

Mfd. for: MILES INC.
Consumer Household Products Division
7123 West 65th Street
Chicago, IL 60638

TYPE SIZE

Text -- Minimum of 2 mm.

KEEP OUT OF REACH OF CHILDREN -- Minimum of 3.5 mm.

CAUTION -- Minimum of 5 mm.