

Mr. John Glisson
Hill Manufacturing Company
1500 Jonesboro Road, S.E.
Atlanta, GA 30315

JUL 29 1986

Dear Mr. Glisson:

Subject: Amendment - Update Label
HILCO No. 74 Roach and Insect Spray
EPA Registration No. 402-95
Your submission dated October 23, 1985

The amendment referred to above, submitted in connection with 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. Add the phrase "Recommended for commercial/industrial use". This should appear in the same type size as that required for "KEEP OUT OF REACH OF CHILDREN".
2. Delete ", including those resistant to certain chlorinated hydrocarbon and phosphate insecticides" from the front panel claims.
3. Revise "Ingredients" to "Active Ingredients" and correct the spelling of "methylcarbamate" [add the missing "y"].
4. Based on the size of the submitted labeling, the child hazard warning KEEP OUT OF REACH OF CHILDREN should be set in a minimum of 12 point type. CAUTION should appear in a minimum of 18 point type. Note that the heading STORAGE AND DISPOSAL has the same minimum type size requirements as KEEP OUT OF REACH OF CHILDREN.
5. Delete "May be" before "Harmful if swallowed, etc."
6. Delete "Should illness occur, get prompt medical aid."
7. A Statement of Practical Treatment must be added to the labeling. We suggest the following statement, however, if your toxicological data suggests otherwise, please submit a draft Statement of Practical Treatment for prior approval:

- If swallowed - Call a physician or Poison Control Center immediately. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.
- If inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.
- 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 immediately.

Note to Physician - Solvent presents aspiration hazard. Gastric lavage may be indicated if material was taken internally. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal.

8. Relocate the paragraph that begins "Do not use as a space spray." from the Hazards to Humans & Domestic Animals section to the Directions For Use to appear as the first paragraph under "It is a violation ...". Likewise, relocate "Do not apply to animals Remove pets and cover fish bowls before spraying. Do not spray plants." to appear in the Directions For Use as a continuation of the "Do not use as a space spray" paragraph.
9. The Environmental Hazards text should appear as follows:

This product is toxic to fish birds and other wildlife. Do not apply directly to water or wetlands. Do not contaminate water by cleaning of equipment or by disposal of wastes. Apply this product only as specified on this label.
10. In the Directions For Use, revise the claim to read "... is especially formulated for use in non-food areas of Flour Mills, Dairies, Canneries, Bottling Plants, Warehouses, Supermarkets, Restaurants and Schools. Non-food areas include garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling).
11. Delete "refrigerators" and "stoves" from the cockroach control directions. Such sites are associated with food areas, which is not a permitted use for this product.

12. The directions for use in switch panels and junction boxes presents a potential electrical hazard. Add the following precautions immediately after indicating these use sites:

Prior to application de-energize electrical equipment. After application, allow time for oil to evaporate before starting motors or placing switches in the "ON" position.

13. In the directions for use in meat packing & food processing plants:
- a. Revise the claim to: For Use in Non-Food Areas of Meat Packing & Food Processing Plants.
 - b. Delete ", including those that are federally inspected". The registration file for this particular product does not include any indication that you applied to USDA to request acceptance for use of this product in such Federally Inspected facilities.
 - c. Delete "Any exposed food products, equipment, or packaging materials must be removed or covered before spraying. Treat Food Processing Plants early in the season before canning or other processing begins. Repeat applications, if necessary when plant is not in operation." as such statements imply use in food areas of such plants.
 - d. Add the following immediately after "Use only in inedible product (non-food) areas of these plants.":

Non-food areas include garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling).

Please submit five (5) copies of the amended labeling bearing the above revisions prior to release for shipment under the amended labeling.

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

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767)

ACCEPTED
WITH COMMENTS
in EPA Letter Dated:

JUL 29 1986

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

402-95



The Best of Quality

HILCO NO. 74

ROACH AND INSECT SPRAY

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

May be harmful if swallowed, inhaled, or absorbed through the skin. Do not get in eyes, on skin, or on clothing. In case of contact, wash immediately with soap and warm water. Wash hands, arms and face thoroughly with soap and water before eating or smoking. Wash all contaminated clothing with soap and hot water before re-use. Should illness occur, get prompt medical aid. To Physician - Atropine sulfate is antidotal.

Do not use as a space spray. Provide adequate ventilation of area being treated. Do not allow children to contact treated areas until surfaces are thoroughly dry. DO NOT APPLY IN THE EDIBLE PRODUCT AREAS OF FOOD PROCESSING PLANTS.

ENVIRONMENTAL HAZARDS

Do not apply to animals. Remove pets and cover fish bowls before spraying. Do not spray plants.

PHYSICAL HAZARDS

COMBUSTIBLE. Do not store or use near heat or open flame.

STORAGE AND DISPOSAL

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

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

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State, Federal and local authorities.

NO. 74 ROACH AND INSECT SPRAY is a highly effective formulation for control of the insects listed below, including those resistant to certain chlorinated hydrocarbon and insecticides. This product drives insects from their hiding places and gives rapid kill and long residual activity.

KILLS: Ants, Brown Dog Ticks, Cockroaches, Firebrats, Fleas, Gnats, Mosquitoes, Paperlice, Fleas, Sandflies, and Silverfish.

INGREDIENTS:

o-Isopropoxyphenyl methylcarbamate	
2,2-Dichlorovinyl dimethyl phosphate	
Related Compounds	
Pyrethrin	
Piperonyl Butoxide, Technical	
N-Octyl Bicycloheptane dicarbonide	
Petroleum Distillate	
INERT INGREDIENTS	
TOTAL	

*Consists of 9.98% (butylcarbityl) (6-propylpiperonyl) ether and 9.62% related compounds.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS



HILCO MANUFACTURING CO., INC.
1500 JONESBORO ROAD, S.E.
ATLANTA, GA. 30315
(404) 522-6364

EPA Reg. No. 402-95 FOR INDUSTRIAL USE ONLY EPA No.

Net Contents _____ Gallons