

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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432-729

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Mr. Bert Atsma
Pesticide Registration Specialist
Roussel Bio Corporation
170 Beaverbrook Road
Lincoln Park, NJ 07035

JUL 28 1989

Dear Mr. Atsma:

Subject: Revised Labeling - Residual Claims
Efficacy of Some Pyrethroid Insecticides for Control
of German Cockroach Infestations in Public Housing
DETHIOR 3.75% FC
EPA Registration No. 432-729
Your Amended Applications Dated November 21, 1988
and March 1, 1989

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 change listed below before you release the product for shipment bearing the amended labeling.

- Delete the claims for "general" cockroaches. Claims must be limited to "German" cockroaches. The data presented (MRID No. 409078) are adequate to support a claim for residual control of German cockroaches only when the subject product is applied at a concentration of 0.06% active ingredient according to label directions. This, together with the data in MRID No. 409172-01, and the summary of EPA's review dated November 23, 1988 (see 201.1.5, 201.1.2.5, and 202.2:1, c.) will suffice for the field testing required under §95-11 (c)(2)(ii)(A)(b) on page 270 of the Product Performance Guidelines and addressed in our letter of October 27, 1987 for German cockroach control. However, as stated in 202.2.1.A and 202.3.A and B of our review dated November 23, 1988, some testing at label rates using the American cockroach is necessary to support a general claim for cockroaches. Please note that we consider the currently submitted data as a partial response to the deficiencies noted therein. The matter of poor residual kill on the painted plywood has yet to be addressed along with the implications it poses for Pesticide Control Operator applications in households and other premises.

57476:I:Hayward:LR-1:KENCO:7/26/89:9/7/89:rw:vo:ek:rw:VC:CT

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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 yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (N7505C)

Enclosure

DETHMOR 3.75% EC

A SYNTHETIC PYRETHROID INSECTICIDE FOR RESIDUAL CONTROL OF COCKROACHES, CRICKETS, ANTS AND FLEAS.

Only For Sale To, Use and Storage By Pest Control Operators

ACTIVE INGREDIENTS:

(1R, 3S) 3[(1'R,S) (1', 2', 2', 2' -tetrabromoethyl)] dimethylcyclopropanecarboxylic acid (S)-isomer phenoxybenzyl ester 1/	3.75%
Inert ingredients	96.25%
	100.00%

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 432-729

Contains Xylene and other Petroleum distillates. Equivalent to 8.3 lbs. active ingredient per gallon.

PRECAUCION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que le explique la haya side explicada ampliamente.
(TO THE USER: If you cannot read English, do not use this product until the label has been explained to you.)

**KEEP OUT OF REACH OF CHILDREN
 DANGER**
 SEE SIDE PANEL FOR ADDITIONAL
 PRECAUTIONARY STATEMENTS AND
 STATEMENT OF PRACTICAL TREATMENT

FOR INDOOR USE ONLY

Can be used in non-food areas of food handling establishments such as, but not limited to, garbage rooms, lavatories, floor drains (to sewers), entries, vestibules and hallways, offices, locker rooms, machine rooms, basements, boiler rooms, garages, utility rooms, mop closets and storage rooms (after canning and bottling).

EPA Reg. No. 432-729

EPA Est. No. 34147-FR-1

P-9/27/88

NET CONTENTS:

LOT NO.

ROUSSEL BIO
 CORPORATION
 PO Box 1077 400 Sylvan Avenue
 Englewood Cliffs New Jersey 07632

**PRECAUTIONARY STATEMENTS
 HAZARDS TO HUMANS & DOMESTIC ANIMALS
 DANGER**

Corrosive, causes irreversible eye damage. Wear goggles or during handling operations. Can cause irritation to skin if get in eyes, or on skin or clothing. Do not breathe vapor. If area should be thoroughly washed with plenty of soap and water before use.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush eyes with plenty of water. Get medical attention.
IF SWALLOWED: Do not induce vomiting. Call a physician. If possible, have person treated by trained personnel because of the irritation of the liquid. Contains petroleum distillates. If necessary, consult physician.
IF ON SKIN: Wash with plenty of soap and water. Get medical attention.
IF INHALED: Remove victim to fresh air. Apply artificial respiration if needed.

ENVIRONMENTAL HAZARD

This pesticide is extremely toxic to fish and other aquatic organisms. Use with care when applying to areas adjacent to any body of water. Dispose of equipment properly. Remove pots and cover trays.

PHYSICAL HAZARDS

Do not use or store near heat or open flame.

DIRECTIONS FOR USE

Use in accordance with the label instructions. This is a violation of Federal law to use this product in a manner not intended.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
STORAGE: Do not store over 100°F or below 10°F. Do not store in unapproved containers.
PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Do not discharge into sewer, stream, or other bodies of water. Pesticide, spray mixture or rinsate is a violation of Federal law if it is discharged to a sewer, stream, or other bodies of water. Dispose of by use according to label instructions, contact your local health department, or the hazardous waste representative of your local government for guidance.

CONTAINER DISPOSAL: Empty containers should be triple rinsed after spray operation. Then offer for recycling or reconditioning, sanitary landfill, or by other procedures approved by state or local government.

0.06% Dilution	1 Gal. (3.89 L)	2 oz (60 ml)
	1 Qt. (0.95 L)	0.5 oz (15 ml)
0.03% Dilution	1 Gal. (3.89 L)	1 oz (30 ml)
	1 Qt. (0.95 L)	0.25 oz (7.5 ml)

Food Handling Establishments: Applications can be made in nonfood areas of schools, nursing homes, hospitals, restaurants, hotels and food manufacturing processing and service establishments. Do not use in the food areas of food handling establishments, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed. (Serving areas are considered to be areas where prepared foods are served, such as dining rooms, but exclude areas where foods may be produced or held.) In the home, all food processing surfaces and utensils should be covered and surfaces washed following treatment. Cover exposed food or remove from premises.

Attention: Do not allow children or pets to come in contact with treated surfaces until surfaces are completely dry. Do not apply where electrical short circuits could occur. Remove or tightly cover fish tanks during application. The treatment area should be vacated until treated surfaces are completely dry.

FLEAS

GENERAL INFORMATION:

For control of fleas in and around infested areas (i.e. homes, residential, non-food areas of commercial, industrial buildings, warehouses, stores). Apply as directed below using a low pressure system using a fan type or variable pattern nozzle which will adequately cover the area but which will not allow dripping or runoff to occur.

APPLICATION DIRECTIONS:

The following treatment results in 21 days of residual control of adult fleas and residual control of flea larvae for up to 4 weeks. Dilute to 0.06% and apply as a fine mist spray to rugs, carpets, pet beds, floor coverings, and other pet resting areas. Apply until area is moist. Treat pet bedding the same way, and spray the entire inside surface of

dog houses. Do not allow pets to contact treated areas until spray has dried. Remove or cover animal feed before spraying. To control the source of flea infestations, pets inhabiting the treated premises should be treated with a flea control product registered for application to animals before they reenter the treated area.

GERMAN COCKROACHES AND CRICKETS

General Information: For residual control of German cockroaches and crickets (such as house crickets, field crickets, camel crickets) in and around infested areas (i.e. homes, residential, commercial and industrial buildings, warehouses, stores, and modes of transportation). Avoid application to latex-painted plywood surfaces as control may not be satisfactory. Use the higher rate for repeat treatments on linoleum and vinyl surfaces. For best results, do not use hard water, and use water with a pH near neutral for dilution of this product.

Application Directions: Apply diluted product as a general and/or spot surface application in a low pressure system using a fan type or variable pattern nozzle to adequately cover the area, but which will not allow dripping or runoff to occur. Applications can be made to walls, floors, ceiling, in and around cupboards, between, behind and beneath equipment, appliances, along baseboards, cracks and crevices, floor drains, window and door frames, and on the underside of shelves, drawers, and in similar areas. Applications may be made to floor surfaces along baseboards and around air ducts, however, do not treat entire area of floor covers. Use the higher rate for heavy infestations, and the lower rate for light infestations and maintenance. May be used at the rate of up to 1 gal. of diluted material per 1000 sq. ft.

COCKROACHES AND CRICKETS

General Information: For control of cockroaches (such as German, American, Oriental, Brownbanded, and Smokey brown) and crickets (such as house crickets, field crickets, camel crickets) in and around infested areas (i.e. homes, residential, commercial and industrial buildings, warehouses, stores, and modes of transportation).

Application Directions: Apply diluted product as a general and/or spot surface application in a low pressure system using a fan type or variable pattern nozzle to adequately cover the area, but which will not allow dripping or runoff to occur. Applications can be made to walls, floors, ceiling, in and around cupboards, between, behind and beneath equipment, appliances, along baseboards, cracks and crevices, floor drains, window and door frames, and on the underside of shelves, drawers, and in similar areas. Applications may be made to floor surfaces along baseboards and around air ducts, however, do not treat entire area of floor covers.

Dilute to 0.06% for contact spray use. May be used at the rate of up to one gallon of diluted material per 1000 sq. ft.

BEST AVAILABLE COPY

ANTS

For Ants (such as harvesting ants, thief ants, little black ants, Argentine ants, odorous ants, Pharaoh ants, and carpenter ants):

For contact and residual control for up to 8 weeks, dilute to 0.06% and spray trails, nests, and points of entry. Use a low pressure system using a fan type or variable pattern nozzle to adequately cover the area, but which will not allow dripping or runoff to occur. Do not allow children to come in contact with treated surfaces until completely dry. Do not apply where electrical short circuits could occur.

Remove or tightly cover fish tanks during application. The treatment area should be vacated until treated surfaces are completely dry.

May be used at the rate of up to one gallon of diluted material per 1000 sq. ft.

WARRANTY STATEMENT

Our recommendations of use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibilities, including injury or damage, resulting from its misuse as such, or in combination with other materials.