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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OCT 25 2001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Glenda Mah
Chemsico
8464 Chapin Industrial Dr.
St. Louis, MO 63114

Subject: Amendment to Add Pest and Marketing Claims
Real-Kill Automatic Indoor Fogger II
EPA Reg. No. 478-126
Your Resubmission Dated September 24, 2001

Dear Ms. Mah:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. You must revise the disposal statements in accordance with the latest Agency guidance for residential/household pesticide products given in PR Notice 2001-6. A copy of the PR Notice is enclosed. Since this product is packaged in pressurized containers, the appropriate disposal statements are as follows:

Do Not Puncture or Incinerate!

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or [toll free number which meets the criteria in paragraph II.E. of PR Notice 2001-6] for disposal instructions.

2. You must submit or cite the efficacy data described in item 1 of my September 5, 2001 letter to you. I understand that you are preparing a Data Matrix which includes the data that support the efficacy of this product and will forward it to EPA for review when it is completed. Upon receipt of the Data Matrix, we will review the efficacy data you cite/submit to determine if they support this product. Depending on the outcome of our review, additional label revisions may be required.

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosures

Real-Kill Automatic INDOOR FOGGER II

For household use only.

[Kills 20+ Types of bugs • Kills roaches • Kills fleas [adult and flea larvae] • Kills [fast] [on contact] • Fast killing • Keeps [on] killing • [Seeks out] [Finds] bugs where they hide • Finds even hidden bugs • Kills bugs you see, Kills bugs you don't see • Kills hidden bugs • Penetrates Deep • Penetrates into cracks, crevices, and carpet fibers • Dead On...Every Time! • Multi-Purpose Fogger - Kills roaches, palmetto bugs, fleas, flies, ants, mosquitoes, wasps, spiders, moths, hornets, crickets, silverfish, ticks and waterbugs • Kills crawling, flying, stinging and biting insects • Controls heavy infestations • [Kills Hidden Bugs] [Kills on Contact] [and] [plus] [neutralizes] [eliminates] odor [s] in your [the] home • No wet residue • Won't Leave a Wet Messy Residue • Easy to use as 1, 2, 3 • Water-based [formula] • Non-staining]

Options for Fragranced Formula: Fresh Floral / Scent / Perfume • Country Potpourri / Scent / Perfume • Floral Breeze / Scent / Perfume • New Improved / Spring Fresh Scent • Country Orchard Scent / Orchard Fresh Scent • Combines proven insect killing technology with an odor neutralizer • No lingering odor • No unpleasant odor • Pleasant scent • Lite, pleasant scent • Light scent • No unpleasant residual odor • Unscented • [Now] With [pet] odor [neutralizer] • [Neutralizes] odor [s] in your [the] home [and Leaves a Clean Fresh Scent] • Effectively neutralizes [eliminates] odor [s] • Neutralizes [pet] odor [s] and freshens the home • Odor [neutralizing] [system] [technology] [formula] • Does not leave a strong scent [fragrance]

Active Ingredients:

Tetramethrin	0.2%
Permethrin	0.4%
Other Ingredients	99.4%

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for additional precautionary statements

NET WT. 6 OZ./170 g

ACCEPTED with COMMENTS to EPA Letter Dated

OCT 25 2001

OPTIONAL MARKETING LANGUAGE

Kills [adult and pre-adult (larvae)] fleas, roaches [cockroaches], palmetto bugs, waterbugs, flies, ants, mosquitoes, spiders, moths, crickets, wasps, hornets, silverfish, Earwigs, firebrats, gnats, flies, pillbugs, black carpet beetles, rice weevils, sawtoothed grain beetles and ticks.

For use in apartments, homes, attics, basements, garages, pet sleeping areas and cabins.

One can treats 6,000 cubic feet (a room up to the size of 25' x 30' with an 8' ceiling) of unobstructed area.

When used as directed, it will not harm drapes, upholstery fabrics, carpeting, bedspreads, clothing, linens, furniture, walls, floor tiles, ceilings, shades or blinds.



[STOP!] Read entire label before use.

DIRECTIONS FOR USE

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

TO USE THIS PRODUCT CORRECTLY

Graphic showing how NOT to use

DO NOT use more than one fogger per room.

DO NOT use in small, enclosed spaces such as closets, cabinets, or under counters or tables. Do not use in a room 5 ft. x 5 ft. or smaller; instead, allow fog to enter from other rooms. (Graphic showing how NOT to use)

Graphic showing how NOT to use

TURN OFF ALL IGNITION SOURCES such as pilot lights (shut off gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.). Call your gas utility or management company if you need assistance with your pilot lights.

BEFORE YOU FOG

Cover or removed exposed food, dishes and food preparation equipment. Open cabinets and doors. Shut off fans and air conditioners and turn off all ignition sources as directed above. Remove pets including birds. Cover and turn off fish tanks. Close outside doors and windows.

TO START FOGGING

- Place several layers of newspaper or paper towels on a table, stand or floor in center of room. Cover waxed wood floors and waxed furniture in the immediate area surrounding the fogger. Newspapers may be used. Graphic: Newspaper on a stool or furniture
- SHAKE WELL BEFORE USING. Tilt can top away from face. Press valve all the way down, hooking the catch. Graphic of valve locking
- Set can on newspaper or paper towels and leave the premises immediately. Do not re-enter treated area for two hours.

AIRING OUT

After two hours, open all doors and windows, turn on air conditioner and fans and air out for 30 minutes. Re-apply every two to four weeks if needed.

NOTE: When treating for fleas or ticks, clean and treat pet sleeping areas. Also treat dogs and cats with a flea and tick control product registered for use on pets before allowing them to enter the treated areas.

STORAGE AND DISPOSAL

Store in cool, dry area away from heat or open flame. Discard container in trash. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through skin or inhaled. May be harmful if swallowed. Avoid contact with eyes, skin

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and clothing. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of food and drinking water. All food preparation surfaces and utensils should be covered during treatment or thoroughly washed before use. Do not use in commercial food handling establishments, restaurants or other areas where food is commercially prepared or processed.

First Aid

If Swallowed: Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person. **If Inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a Poison Control Center or doctor for further treatment advice. **If on Skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice. **If in Eyes:** Hold eyes open and rinse slowly and gently with plenty of water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a Poison Control Center or doctor for treatment advice.

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

Physical or Chemical Hazards



This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this [label] [box] [can] very carefully. Contents under pressure. Do not use near heat or open flame. Do not puncture or incinerate. Exposure to temperature above

130°F may cause bursting.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with direction.

Questions or comments? Call 1-800-332-5553 or visit our website www.hotshotbrand.com

[Contains NO CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.]

Made in the USA for Realex, Division of United Industries Corporation, P.O. Box 142642, St. Louis, MO 63114-0642

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