

478-126

02/10/2003

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB 10 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Glenda Mah
Realex, Div. of United Industries Corp.
P.O. Box 142642
St. Louis, MO 63114-0642

Subject: Amendment to Add Pest and Marketing Claims with Supporting Efficacy Data
Real-Kill Automatic Indoor Fogger II
EPA Reg. No. 478-126
Your Resubmission Dated July 24, 2002

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. A copy of our review of efficacy data submitted to support this amendment is also enclosed.

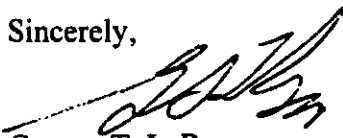
1. You must delete the following front panel claims:
 - "Keeps [on] killing" (No data were submitted/cited to support residual claims.)
 - "Kills ... stinging ...insects" ("Stinging insects" implies control of wasps, hornets and bees for which you did not submit or cite efficacy data.)

2. Revise as shown (revisions are underlined) and move the following statements from the Hazards to Humans & Domestic Animals section to the Directions for Use:

"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 sites where food is commercially prepared, processed or served."

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 on contact • 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, spiders, moths, 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 • 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]]

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
FEB 10 2003**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
478-126**

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./ (70 g)

OPTIONAL MARKETING LANGUAGE

Kills [adult and pre-adult (larvae)] fleas, roaches [cockroaches], palmetto bugs, waterbugs, flies, ants, mosquitoes, spiders, moths, crickets, 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



DO NOT use more than one room. **DO NOT** use in small spaces such as closets, under counters or tables. Do room 5 ft. x 5 ft. or smaller, fog to enter from other rooms.



fogger per enclosed cabinets, or not use in a instead, allow

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.

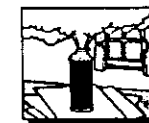
BEFORE YOU FOG

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

1. 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.

2. **SHAKE WELL BEFORE USING.** Tilt can top away from face. Press valve all the way down, hooking the catch.



3. 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

Storage: Store in cool, dry area away from heat or open flame. Do Not Puncture or Incinerate! **Disposal:** If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

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 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

EPA Reg. No. 478-126

EPA Est. No. 9688-MO-1

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