



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

December 9, 2004

Aludia B. Hernandez
Technical & Regulatory Compliance Manager
Chase Products Co.
P.O. Box 70
Maywood, IL 60153

Subject: Amendment - Response to Agency's September 16, 2003 letter
Spraypak Crawling Insect Killer Formula 3
EPA Reg. No. 498-173
Your Submission Dated October 14, 2004

Dear Ms. Hernandez:

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. Move "Avoid contamination of feed and food stuffs" to the Directions for Use section.
2. Replace "This product is toxic to fish" with "This product is toxic to fish and other aquatic organisms" in the Environmental Hazards statement.
3. Change "Bedding" to "Mattresses" on front panel.
4. Under Directions for Use add "Not for use on plants being grown for sale or other commercial use or for commercial seed production or for research purposes".

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in black ink that reads "BeWanda Alexander" followed by a stylized flourish.

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

3/7

ACCEPTED
with COMMENTS
In EPA Letter Dated
DEC 9 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
498-173

FRONT PANEL

SPRAYPAK®
CRAWLING INSECT KILLER
FORMULA 3

READ ENTIRE LABEL BEFORE USE.

- **SEEKS OUT BUGS WHERE THEY HIDE. • KILLS ON CONTACT.**
- **CONTROLS RESIDENTIAL AND GARDEN INSECTS.**
- **FOR HOUSEHOLD USE.**
- **A BROAD-SPECTRUM INSECTICIDE HIGHLY EFFECTIVE AGAINST ANTS (INCLUDING CARPENTER ANTS), BEES, BEETLES (INCLUDING CARPET, FLOUR, GRAIN, AND GROUND BEETLES), CENTIPEDES, CLOVER MITES, COCKROACHES, CRICKETS (INCLUDING MOLE CRICKETS), EARWIGS, FIREBRATS, FLEAS, MILLIPEDES, MOTHS, PILL BUGS, SCORPIONS, SILVERFISH, SOW BUGS, SPIDERS, TICKS (INCLUDING TICKS WHICH MAY CAUSE LYME DISEASE), WASPS AND OTHER PESTS LISTED ON THE LABEL.**
- **KILLS LICE AND THEIR EGGS.**
- **FOR USE ON BEDDING, FURNITURE AND OTHER INANIMATE OBJECTS INFESTED WITH LICE.**
- **NONSTAINING. • NO UNPLEASANT ODOR. • WATER-BASED FORMULA.**
- **FOR USE ON DOGS AND ON PREMISES TO CONTROL FLEAS AND TICKS.**
- **CONTROLS FLEAS AND TICKS ON DOGS FOR 14 DAYS.**
- **PROTECTS FOR UP TO 4 WEEKS AGAINST ANTS**
- **PROTECTS FOR UP TO 12 WEEKS/ 3 MONTHS AGAINST ANTS, COCKROACHES AND HOUSEFLIES.**

ACTIVE INGREDIENTS:

Pyrethrins.....	0.20%
* Piperonyl butoxide, technical.....	1.00%
** Permethrin.....	0.40%
OTHER INGREDIENTS:.....	98.40%
Total	100.00%

*Equivalent to min. 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% related compounds.

** (3-Phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (+/-) cis and max. 65% (+/-) trans.

EPA Reg. No. 498-173

EPA Est. No. 498-IL-1

NET WT. XX OZ. (XXX g)

KEEP OUT OF REACH OF CHILDREN

CAUTION

Read precautions on back of can.

BACK PANEL

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if inhaled. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash before reuse.

Avoid contamination of feed and foodstuffs.

FIRST AID

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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. **DO NOT PUNCTURE OR INCINERATE CONTAINER.** Exposure to temperatures above 130°F (54°C) may cause bursting.

DIRECTIONS FOR USE

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

Remove pets and birds and cover fish aquariums before spraying. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry. Do not use in commercial food/feed handling establishments, restaurants, or other areas where food/feed is commercially prepared, processed, stored or served.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place away from heat or open flame. Do not contaminate water, food or feed by the use, storage or disposal of this product. Avoid freezing.

DISPOSAL: 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 1-800-CLEANUP for disposal instructions.

In the home, all food-processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

SHAKE WELL BEFORE USING

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches.

INDOORS:

CLUSTER FLIES, HOUSEFLIES, FRUIT FLIES, MOSQUITOES, GNATS, WASPS, HORNETS, BEES, BLACKFLIES, SKIPPER FLIES, BLOWFLIES AND SMALL FLYING MOTHS: Close all doors and windows and direct spray upward into center of room with a slow, sweeping motion. Spray 5 to 10 seconds for average room, moving toward the door. Direct spray to all parts of the room, especially windows and other light sources which attract these insects. Keep nozzle in constant motion. Leave room and keep area closed for 15 minutes after spraying. Ventilate room thoroughly before reentry. Sweep up and discard fallen insects.

COCKROACHES, WATER BUGS, PALMETTO BUGS, SILVERFISH, FIREBRATS, CRICKETS, SCORPIONS, SPIDERS, MILLIPEDES, CENTIPEDES, SOW BUGS AND PILL BUGS: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible.

ANTS: Spray trails, nests and points of entry. Spray on ants where possible.

CARPET BEETLES: Spray directly on beetles, floors, baseboards, shelves and carpets.

BEDBUGS: Spray mattresses, particularly around tufts and seams. Take beds apart and spray into all joints. Treat baseboards, moldings and floors. Repeat treatment as necessary. Allow all sprayed articles to dry thoroughly before use.

To control **CLOTHES MOTHS AND CARPET BEETLES** on wool and other proteinaceous fibers: Remove infested articles from storage, brush thoroughly, and air for several hours in sunlight, if possible. Apply spray liberally to empty chests, closets, bureaus and other storages, directing the spray into cracks, joints and crevices. After airing, infested articles may be treated by spraying lightly, keeping nozzle at least 3 feet from fabric to avoid staining.

FLEAS in buildings - Space spray: Hold can 36 inches above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 square feet, making sure that all floor, sofa and chair surfaces are contacted. Leave room and keep area closed for 15 minutes. Open and ventilate before reoccupying. Repeat treatment after 7 days or as needed.

FLEAS AND TICKS, INCLUDING TICKS WHICH MAY CAUSE LYME DISEASE (ADULTS AND LARVAE): Remove and thoroughly clean or destroy pet bedding. Spray pet

sleeping quarters, bed, entire floor and floor covering, with special attention to cracks and crevices around baseboards, and window and door frames. Infested upholstered furniture and mattresses may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

To control **FLEAS, TICKS AND LICE ON DOGS**: Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals. Sensitivities may occur after using ANY pesticide products for pets. If signs or sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Starting at the head, stroke against the lay of the hair, spraying the parted fur in short bursts directly behind the hand to insure penetrating the coat. Dampen the fur back to the tail. Repeat application weekly if necessary to control infestations. **NOTE: Not recommended for use on puppies less than twelve weeks old.**

To kill **LOUSE EGGS AND LICE**: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square foot for 3 seconds. Spray only those garments and parts of bedding, including mattresses and furniture, that cannot be either laundered or dry cleaned. Allow all sprayed articles to dry thoroughly before use.

OUTDOORS:

Remove all exposed food and cooking utensils. Cover all food handling surface or wash thoroughly after treatment and before use. Do not use on edible crops.

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Allow a few minutes for product to take effect. Spray with wind if breeze is blowing.

FLYING INSECTS: FLIES, MOSQUITOES, GNATS, SMALL FLYING MOTHS, HORNETS AND YELLOW JACKETS. Allow fog to drift over area. Direct spray toward bushes or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles.

MUD DAUBERS AND WASP NESTS: Spray mist directly on insects and their nests from approximately 2 feet away. Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Spray into hiding and breeding places, contacting as many insects as possible.

CRAWLING INSECTS: ANTS, COCKROACHES, INCLUDING ASIAN COCKROACHES, CRICKETS, MOLE CRICKETS, CENTIPEDES AND SILVERFISH. Hold can 2 to 3 feet from surface to be treated and spray in infested surface of patio or picnic area, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control. Spray to slightly moisten the surface.

FOR THE CONTROL OF GARDEN PESTS: For use on roses, dahlias, asters and other

ornamentals to kill **JAPANESE BEETLES HIT BY SPRAY, AS WELL AS WHITEFLIES, APHIDS, EXPOSED THRIPS, SPIDERS, RED MITES AND LEAF MINERS.**

May be used on plants, as well as a multi-purpose spray in small gardens and for spot treatment of incipient insect infestations to prevent spreading in large garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed again **WHITEFLIES, APHIDS, SPIDER AND RED MITES, EXPOSED THRIPS, LACE BUGS, JAPANESE BEETLES, PAVEMENT ANTS, CLOVER MITES AND ARMYWORMS.** When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Spray in one-second bursts. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F (32°C). Contact insects directly whenever possible. Repeat treatment as reinfestations occur.

THE USER OF THIS PRODUCT ASSUMES ALL RISKS OF USE, STORAGE AND HANDLING NOT IN ACCORDANCE WITH ITS DIRECTIONS AND CAUTIONS.

Questions about this product? Call (708) 865-1000.

MEDICAL INFORMATION ONLY:

Chem-Tel, Inc. (800) 255-3924

Chase Products Co.

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P.O. Box 70 -- Maywood, IL 60153

www.chaseproducts.com

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BOTTOM OF LABEL
