02/17/2004



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

> OFTER OF PREVENTION PERTURN AND TONE SUBSTANCES

February 17, 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 18, 2003 letter Spraypak Institutional Crawling Insect Killer Formula 3 EPA Reg. No. 498-174 Your Submission Dated October 22, 2003

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 foodstuffs" to Directions for Use section.
- 2. Revise the first statement under Environmental Hazards to read "This product is toxic to fish and other aquatic organisms."
- 3. Delete the protection claim "for up to 4 weeks" since you already claim "for up to 12 weeks" for the same pests.

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

Sincerely, Boblanda Welander Ar George T. LaRocca

Product Manager (13) Insecticide Branch Registration Division (7505C)

FRONT PANEL

SPRAYPAK® INSTITUTIONAL **CRAWLING INSECT KILLER FORMULA 3**

• SEEKS OUT BUGS WHERE THEY HIDE. • KILLS ON CONTACT.

CONTROLS INDUSTRIAL INSECTS.

 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, COCKROACHES AND HOUSEFLIES.

• 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%

ACCEPTED with COMMENTS In EPA Letter Dated FEB 1 7 2004 Under the Federal Insecticide. Pungicide. and Rodenticide Act. as amended, for the pesticide registered under EPA Reg. No.

*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. 498-174

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.

SR

BACK PANEL



READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON DOGS

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 STATEMENT

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 by disposal.

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.

STORAGE & 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.

Do not apply directly to food.

Do not use in food/feed areas of food/feed-handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed

or facility is in operation. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held.

Nonfood areas are areas such as 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).

Commercial food/feed areas where the product cannot be used include areas for receiving, serving, storage (dry, cold, frozen, raw), packaging (cleaning, slicing, cooking, grinding), edible waste storage, enclosed processing systems (mills, dairies, edible oils, syrups). Authorized for use in nonfood/feed areas of food/feed- processing plants and official establishments operating under the Meat, Poultry, Shell Egg Grading and Egg Products Inspection Programs.

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use.

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

SHAKE WELL BEFORE USING

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.

INDIAN MEAL MOTHS, ANGOUMOIS GRAIN MOTHS: Close doors and windows, direct spray into all parts of room, especially around stored food- product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1,000 cubic feet of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment.

EXPOSED STAGES OF CONFUSED FLOUR BEETLES, CIGARETTE BEETLES, DRUGSTORE BEETLES, SAW-TOOTHED GRAIN BEETLES, RED FLOUR BEETLES,

RICE WEEVILS, GRANARY WEEVILS, GRAIN MITES IN EXPOSED ADULT AND LARVAE STAGES: Spray into cracks and crevices, processing and handling equipment, around cartons or containers or other areas where these insects tend to congregate. Contact as many insects as possible. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. Space spray: Spray 20 seconds per 1,000 cubic feet of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment. Repeat application weekly or as necessary. Infested stored food products should be disposed of, or treated using an approved product intended for this purpose.

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. 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.

DO NOT USE on puppies under 12 weeks old.

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 of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

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.

In animal quarters and milk rooms: FOR RAPID CONTROL OF HOUSEFLIES, MOSQUITOES, GNATS, WASPS, HORNETS, BEES AND SMALL FLYING MOTHS: close windows and doors and spray at the rate of 2 seconds per 1,000 cubic feet of space. For best results, keep area closed for 10 minutes after spraying. Do not remain in treated area and ventilate after treatment is completed.

To treat livestock: To protect beef cattle, dairy cattle, goats, sheep, hogs and horses from attacks of **STABLE FLIES**, **HORSEFLIES**, **DEERFLIES**, **FACE FLIES**, **HOUSEFLIES**, **HORN FLIES**, **MOSQUITOES AND GNATS**: Spray about 3 seconds on each side, being careful to spray back, withers and forelegs thoroughly. To protect from FACE FLIES, spray the face and head, but do not spray into eyes.

FOR SWINE: Do not ship animals for slaughter within 5 days of last treatment.

TO CONTROL BLOODSUCKING LICE: Apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

TO CONTROL *POULTRY LICE:* spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

FOR CONTROL OF *BEDBUGS AND MITES* in poultry houses, spray crevices of roost poles, cracks in walls, and cracks in nests where the bedbugs and mites hide.

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 two (2) to three (3) feet from surface to be treated and spray in infested surface of patio or picnic area, hitting as many insects as possible. Spray to slightly moisten the surface. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control.

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. <u>MEDICAL INFORMATION ONLY:</u> <u>Chem-Tel, Inc. (800) 255-3924</u>

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BOTTOM OF LABEL