

506-125

02/10/2009

46

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



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

March 3, 2009

Walco-Linck Company
c/o Ms. Kim Davis
RegWest Company, LLC
30856 Rocky Road
Greely, CO 80631-9375

Dear Ms. Davis:

Subject: Retraction of comment in letter dated February 10, 2009
TAT[®] Roach Bait
EPA Reg. No.: 506-125

In a letter dated February 10, 2009, we requested that you list the EPA registration Number and Establishment Number on the front panel of the individual product container. However, due to space issues and the fact that these numbers are already listed on the side panel of the individual container, we have determined that it is not necessary for you to list the numbers on the front panel. The label stamped on February 10, 2009 is therefore acceptable without comment. If you have any questions, please contact Julie Chao at 703-308-8735 or chao.julie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert", written over a large, stylized circular flourish.

John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505P)

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



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

February 10, 2008

Walco-Linck Company
c/o Ms. Kim Davis
RegWest Company, LLC
30856 Rocky Road
Greely, CO 80631-9375

Dear Ms. Davis:

Subject: Amended Label
TAT[®] Roach Bait
EPA Reg. No.: 506-125
Submission dated January 30, 2009

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- On the front panel of the individual container (shown on page 3), you must list the EPA Registration Number and Establishment Number.

A stamped copy is enclosed for your records. Submit two copies of your final printed labeling before you release the product for shipment. Should you have any questions, please contact me at 703-308-8735 or chao.julie@epa.gov.

Sincerely,

John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505P)

3/0

TAT® Roach Bait

{ABN: TAT® Roach Killer VI}

Kills German Roaches



In To Feed



Out To Die

[Special Bonus Pack! 4 Baits for the Price of 3]
[Economy Pack 2 Boxes – 12 Baits Total]

Guaranteed!
See Details on Back

For use in Homes, Apartment Buildings, Stores, Restaurants,
Warehouses, Campers, Cabins and Trailers

Kills German Roaches as Long as Bait Lasts **Round the Clock Killing**
Kills German Roaches **Clean, Effective, Economical**

✦ Peanut Butter-Based Bait ✦

Active Ingredient:

Propoxur (CAS No. 114-26-1)	2%
Other Ingredients	98%
Total	100%

Save Card/Box for Label Reference

<p>Keep Out of Reach of Children CAUTION See back panel for additional precautionary statements.</p>
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[Contains] ___ [Roach] Baits [Trays] [Traps]
Net Wt. Each 1/6 oz. (4.7g) Total Net Wt. ___ oz. (___ g)

EPA Reg. No. 506-125 EPA Est. 82446-TN-1

Sold by [Made for] [Manufactured for]
Walco Linck Company
3300 Corporate Drive Joliet, IL 60431
[telephone number]

ACCEPTED
With COMMENTS
In EPA Letter Dated:
FEB 10 2009
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

506-125

4/6

**Tough on Bugs
Easy on Your Wallet**

**TAT® ROACH BAIT
KILLS: German Roaches**

First Aid

If Swallowed	<ul style="list-style-type: none">• Immediately call a poison control center or doctor for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on Skin or Clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Immediately rinse skin with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in Eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with 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. [For information regarding medical emergencies or pesticide incidents, call 1-866-767-5047.]	
Note to Physician: Propoxur is a reversible cholinesterase inhibitor. Atropine sulfate is antidotal and should be administered only if symptoms persist.	

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. This product contains peanut butter; persons with known peanut allergies should exercise caution when pressing in semi-perforated holes. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

Environmental Hazards

This product is toxic to wildlife and aquatic invertebrates. Birds and small animals feeding on treated bait may be killed. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

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

[Refer to card/box for Complete Directions for Use]

READ ENTIRE LABEL BEFORE USING.

USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

READ INSTRUCTIONS BEFORE PRESSING IN SEMI-PERFORATED HOLES.

5/0

Precautions and Restrictions

- Place bait trays in areas inaccessible to children and domestic animals.
- Do not contaminate feed, food products, food preparation surfaces, dishes, kitchen utensils or food containers.

Application Instructions

- Place bait trays where you have noticed infestation and where German roaches are numerous – on shelves, in drawers, baseboards, under sinks, stoves and refrigerators, in bathrooms, etc.
- Find indented sections on the sides of the can.
- Simply apply pressure with key until they open (see illustration).
- For best results use 4 to 6 trays [traps] per 100 square feet [2 to 3 trays per 50 square feet] of surface area to be treated. More bait trays may be needed if infestation is great.
- For continuous good results check regularly and replace every four weeks or as needed. Death occurs soon after feeding. German roaches leave bait tray and return to hiding places to die.

{Illustration
of
Can, Key and Hand
(opening indented
section)}

[Storage and Disposal]

Storage: Store in a cool, dry (preferably locked) storage area inaccessible to children and pets. Keep pesticide in original containers. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

For additional information call {telephone number}

NOTICE: To the extent consistent with applicable law, Buyer assumes all responsibility for safety and use not in accordance with directions.

Money Back Guarantee: If TAT® Roach Bait does not provide satisfactory results return all [number] [both] bait trays [traps], in their original package, to Walco Linck.

Made in [the] USA
[Made and Printed in the USA]
[Printed on recycled paper {graphic}]

{Individual Container – Front Panel:}

**Keep Out of Reach of Children
CAUTION**

See back panel for additional precautionary statements.

**TAT® Roach Bait
Kills: German Roaches
Peanut Butter-Based Bait**

Active Ingredient:	
Propoxur (CAS No. 114-26-1)	2%
Other Ingredients	98%
Total	100%

Net Wt. 1/6 oz. (4.7g)

6/6

{Individual Container – Back Panel:}

PRECAUTIONARY STATEMENTS: Hazards to Humans & Domestic Animals: CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. This product contains peanut butter; persons with known peanut allergies should exercise caution when pressing in semi-perforated holes. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse. **Environmental Hazards:** This product is toxic to wildlife and aquatic invertebrates. Birds and small animals feeding on treated bait may be killed. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Refer to card/box for complete Precautionary Statements.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Refer to card/box for Complete Directions for Use. **Storage:** Store in a cool, dry (preferably locked) storage area inaccessible to children and pets. Keep pesticide in original containers. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If party filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

{Individual Container – Side Panel:}

READ INSTRUCTIONS BEFORE PRESSING IN SEMI-PERFORATED HOLES.

Read entire label before using.

Use strictly in accordance with label precautionary statements and directions.

TAT® Roach Bait

Sold by [Made for] [Manufactured for]

Walco Linck Company

3300 Corporate Drive

Joliet, IL 60431

EPA Reg. No. 506-125 EPA Est. 82446-TN-1

{ [] Denotes alternate/optional language

{ } Denotes language that does not appear on the market label

{Universal Substitution: Tray(s) = Trap(s) = Trap Tray(s)}