

506-176

4/19/2001

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

APR 19 2001

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Kim Davis  
Consultant/Agent for Walco-Linck Company  
RegWest Company  
30856 Rocky Road  
Greeley, CO 80631-9375

Subject: Amendment - Revised Labeling  
TAT Roach & Ant with Residual Action 2491  
EPA Reg No. 506-176  
Your submission dated January 3, 2001

Dear Ms. Davis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below. A stamped copy of the label has been enclosed for your records.

1. Revise the "Precautionary Statements" section to read "Harmful if swallowed, absorbed through the skin, or inhaled. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.
2. Move the sentences "Do not contaminate...before spraying." to the "Directions for Use" section.
3. Move the "Storage and Disposal" section to the end of the label.
4. Add the following sentence to the "Storage and Disposal" sections after "...recycling centers. At present, there are only a few such centers in the country."
5. You may delete the sentence "Incineration of container may cause explosion" under the "Physical or Chemical Hazards" section.

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6. Either delete the phrases "Repeat as needed", "Repeat as necessary", and "Repeat treatment when necessary" or indicate a time period based on the residual efficacy of your product. 2/5

Efficacy data for the following public health pests were not provided in your application or in the cited product: black widow spiders, cockroaches, scorpions, fleas, and ticks. Claims for black widow spiders, cockroaches, scorpions, fleas, and ticks should be supported by existing or additional efficacy data. Please provide (or have your supplier provide) the appropriate data in support of these pests.

To expedite handling, please return a copy of this letter with your finished labeling. If you have any questions please call Dr. William Sproat at 703/308-8587.

Sincerely,



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

Enclosure

# TAT ROACH & ANT with RESIDUAL ACTION 2491

**Pressurized Spray**  
**A Thorough Application is Effective for 4-6 Weeks**  
**Gets Them Where They Live!**

**Kills: Ants, Crickets, Palmetto Bugs, Silverfish, Spiders, Waterbugs and Other Listed Insects**

**For Use in Homes, and Non-Food Areas of Commercial Buildings:**  
**Warehouses, Theatres, Offices, Schools, Motels, Hotels,**  
**Restaurants, Food Processing Facilities, Kennels and Hospitals**

**GUARANTEED!**  
**See Details on Back**

**ACTIVE INGREDIENTS:**

d-trans Allethrin (CAS No. 28057-48-9) .....	0.06%
Piperonyl Butoxide, Technical (CAS No. 51-03-6) .....	0.12%
*N-Octyl bicycloheptene dicarboximide (CAS No. 113-48-4) ...	0.20%
Esfenvalerate (CAS No. 66230-04-4) .....	0.05%
<b>OTHER INGREDIENTS** .....</b>	<b>99.57%</b>
<b>Total .....</b>	<b>100.00%</b>

\*MGK-264, Insecticide Synergist  
MGK is a registered trademark of McLaughlin Gormley King Company  
\*\*Contains paraffinic naphthenic solvent

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

APR 19 2001

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

500-176

**Keep Out of Reach of Children**  
**CAUTION**  
See back panel for additional  
precautionary statements.

Net Weight: \_\_\_\_\_ ounces (\_\_\_\_ g)

EPA Reg. No. 506-176

EPA Est. \_\_\_\_\_

Manufactured for  
**Walco-Linck Company**  
P.O. Box 598  
Valley Cottage, NY 10989  
1-800-338-2329



**Contains no CFCs or Other Ozone Depleting Substances**  
**Federal Regulations Prohibit CFC Propellants in Aerosols**

**DIRECTIONS FOR USE**

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

{Domestic homeowner storage and disposal directions:}

**[Storage and Disposal]**

**Storage:** Store in a cool, dry (preferably locked) storage area inaccessible to children and pets and away from sources of heat or ignition. **Disposal:** Replace cap, wrap container and put container in trash. Do not puncture or incinerate. [Alternate Disposal Directions: **Disposal:** This container may be recycled in aerosol recycling centers. Before offering for recycling, empty the can by using the product according to the label (Do not puncture!). If recycling is not available, replace cap, wrap the container and put in trash.]

{Non-domestic/homeowner storage and disposal directions:}

**Storage and Disposal**

**Pesticide Storage:** Store in a cool, dry (preferably locked) storage area inaccessible to children and pets and away from sources of heat or ignition. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** This container may be recycled in aerosol recycling centers. Before offering for recycling, empty the can by using the product according to the label (Do not puncture!). If recycling is not available, replace cap, wrap the container and put in trash.

**General**

**Shake Well Before Use Do Not Use as a Space Spray**

Use this spray only as a spot or crack and crevice treatment to kill cockroaches [roaches], fleas, silverfish, ticks, waterbugs and other insects listed below. Apply this product only as a coarse spray or crack and crevice treatment to localized areas where pests are found or may occur. Spray surfaces until wet, but not to the point of runoff. Do not allow children or pets to contact treated surfaces until spray has dried. Repeat as needed.

Do not apply this product in patient rooms or in any rooms while occupied by the elderly or infirm. Do not apply to classrooms while in use. In the home cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food. Do not use in food areas of food handling establishments, restaurants or other areas where food 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 food may be prepared or held. Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries, vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, closets and storage areas (after canning or bottling). Not for use in federally-inspected meat and poultry plants.

**For Spot Treatment**

[To Kill] Ants, Black Widow Spiders, Carpet Beetles, Cockroaches [Roaches], Crickets, Scorpions, Silverfish, Sowbugs and Spiders	Spray areas where these insects are found or may hide, including dark corners of rooms and closets; cracks and crevices in walls; along baseboards and door and window frames; behind and beneath sinks, stoves, refrigerators and cabinets; and around garbage cans, plumbing and other utility installations. Directly spray pests driven out of hiding places. For ants, spray ant trails and around doors and windows and wherever else these pests may find entrance. Repeat as necessary.
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[To Kill] Fleas and Ticks	Thoroughly apply as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames and localized areas of floor and floor coverings where these pests may be present. Remove old pet bedding and replace with clean, fresh bedding after treatment. <b>Do not spray pets with this product.</b> Prior to pets' reentry into treated area, treat pets with a flea and tick control product registered for use on pets.
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**For Crack and Crevice Treatment**

To Kill Ants, Black Widow Spiders, Carpet Beetles, Cockroaches [Roaches], Crickets, Fleas, Scorpions, Silverfish, Sowbugs, Spiders and Ticks	Apply spray in small amounts directly into cracks and crevices. Equipment capable of delivering a pin stream should be used in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where these insects hide. Do not allow spray to contact exposed surfaces and do not introduce the spray into the air. Do not contaminate food handling surfaces.
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Flies and Mosquitoes	Use only outdoors as an aid in reducing annoyance from these insects. Spray outside surfaces of window and doorframes as well as other areas where these pests may enter the premise. Also spray dark corners and localized resting areas (such as under eaves) of porches, patios and garages where these insects may congregate. Flies and mosquitoes coming to rest on treated surfaces will be killed. Repeat treatment when necessary.
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**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**CAUTION:** Harmful if swallowed, absorbed through skin or inhaled. Do not breathe vapors or spray mist. Avoid contact with skin or eyes. Wash with soap and water after use. Do not contaminate food or feedstuffs. When used indoors, remove pets and birds and cover fish aquariums before spraying.

**First Aid**

If Swallowed	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If Inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
If on Skin or Clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Immediately rinse skin with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If in Eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-888-740-8712 (the international poison center) for emergency medical treatment information.</p>	

**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 may cause bursting. Incineration of container may cause explosion. Do not use this product in or around electrical equipment due to the possibility of shock hazard.

**For Additional Information call 1-800-338-2329**

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

**Money Back Guarantee:** If this product fails to kill the listed insects when used as directed, mail container to Walco-Linck for a full refund.

Made in [the] USA

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