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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 2 1999

Kim Davis, CC, APC
Walco-Linck Company
c/o RegWest Company
Greeley, CO 80632-2220

Dear Ms. Davis:

Subject: Labeling Amendment
TAT Total release Water Based Fogger
EPA Registration No. 506-181
Your application dated 22 April 1999

The labeling amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, has been received and reviewed and the labeling is acceptable subject to the comments listed below. Please submit three (3) copies of your final printed labeling incorporating the changes prior to releasing your product for shipment. A stamped accepted with comments copy is enclosed for your records.

1. You must remove spiders from your labeling or submit adequately supporting data for this claim.
2. You must specify "brown dog tick" rather than the general term "ticks". Some ticks are vectors for Lyme Disease. you cannot include all ticks because this is a false and misleading claim unless you provide adequate data supporting this particular claim.

We have observed those data which you have cited, and they are not adequate to support the claims you have included on this labeling. Should you have any questions, you may contact me directly at 703.305.5412.

Sincerely,

A handwritten signature in black ink, appearing to read "G. LaRocca".

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

Enclosure

**TAT
TOTAL RELEASE
WATER BASED FOGGER**

Total Release Aerosol

For Use in Apartments, Attics, Basements, Boats, Cabins, Campers, Garages, Homes
Household Storage Areas, Pet Sleeping Areas and Rooms

Contains no CFCs or other ozone depleting substances.
Federal Regulations prohibit CFC propellants in aerosols.

One Unit Treats up to 6,000 Cubic Feet

ACTIVE INGREDIENTS:

Tetramethrin (CAS Number 7696-12-0)	0.2%
Esfenvalerate (CAS Number 66230-04-4)	0.1%
N-Octyl bicycloheptene dicarboximide((CAS Number 113-48-4)	1.0%
OTHER INGREDIENTS**	<u>98.7%</u>
Total	100.0%

*MGK[®] 264, Insecticide Synergist

**Contains petroleum distillate

MGK[®] is a registered trademark of McLaughlin Gormley King Company

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

RECEIVED
SEP 2 1999
506-181

Net Contents: 6 fl. oz.

EPA Reg. No. 506-181

EPA Est. _____

Manufactured for
WALCO-LINCK COMPANY
18 Ford Products Road, Drawer A
Valley Cottage, NY 10989

DIRECTIONS FOR USE

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

This product will kill ants, cockroaches, confused flour beetles, crickets, fleas, houseflies, mosquitoes, rice weevils, saw-toothed grain beetles, small flying moths, sow bugs, spiders and ticks.

DO NOT use more than one fogger per room. DO NOT use in small, enclosed spaces such as closets, cabinets or under counters or tables. Do not use in a room 5 ft. X 5 ft. or smaller; instead, allow fog to enter from other rooms. *Turn off ALL ignition sources such as pilot lights (shut off gas valves), or 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.

Cover exposed food, dishes and food-handling equipment. Open cabinets and doors to area to be treated. Shut off fans and air conditioners. Close doors and windows. Point valve opening away from face when releasing. Use on unit for each 6,000 cubic feet of unobstructed area. Do not remain in the area during treatment and ventilate thoroughly before reentry.

To operate valve: Place several layers of newspaper or a pad on a stand or table in the center of the room. Point valve opening away from face. To lock valve in open position for automatic discharge, press valve button all the way down, hooking the catch. Then place fogger on stand or table with valve locked open. Leave building at once and keep building closed for two hours before airing out. Open all doors and windows and allow to air for 30 minutes. Repeat spraying in two weeks or when necessary.

To kill fleas and ticks: Destroy pet's old bedding and replace with clean, fresh bedding after treatment is completed. Use product as above. Pets should be treated with a flea and tick control product registered for pet treatment prior to reentering treated premises.

Storage and Disposal

Storage: Store in a cool, dry area way from heat or open flame. **Disposal:** Replace cap and discard container in trash. Do not incinerate or puncture.

PRECAUTIONARY STATEMENTS**Hazards to Humans & Domestic Animals**

CAUTION: Harmful if inhaled or absorbed through skin. Avoid inhaling spray mist and contact with skin or clothing. Wash thoroughly after handling. Remove contaminated clothing and wash before reuse. Do not use in commercial/feed handling establishments, restaurants or other areas where food/feed is commercially prepared, processed or stored. 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. Remove pets, birds and cover fish aquariums before spraying.

First Aid

If Swallowed: Call a physician or poison control center immediately. Do not induce vomiting because of aspiration pneumonia hazard. **If in Eyes:** Flush with plenty of water. Get medical attention if irritation persists. **If on Skin:** Wash thoroughly with soap and water. Get medical attention if irritation persists. **If Inhaled:** Remove person to fresh air. If not breathing give artificial respiration, preferably mouth-to-mouth. Get medical attention.

Physical or Chemical Hazards

[Flame Graphic]

Highly Flammable Ingredient

Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. 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 very carefully.