

Lisa M. Bamberger
Diversey Corp.
12025 Tech Center Drive
Livonia, MI 48150-2193

21 MAY 1996

Dear Ms. Bamberger:

Subject: Amended Labeling and Confidential Statement of Formula
Syntox
EPA Registration Number 875-165
Submission Dated May 1, 1996

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 following comment:

1. Note that the active ingredient percentage for d-trans Allethrin is different from previously accepted product labeling. After a review of the product file, it appears that the formulation for this product has contained 0.20% d-trans Allethrin and therefore this declaration on the product label is consistent.

A stamped copy of the label is enclosed for your records.

The confidential statement of formula referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the following comment:

1. You must revise the upper certified limits for the two active ingredients to be consistent with 40 CFR 158.175 or provide an explanation from deviating from the standard certified limits.

If you have any questions or comments, please contact me at (703) 305-6788.

Sincerely,

RPK

Richard P. Keigwin, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division (7505C)

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PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION:

Harmful if swallowed or inhaled. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS:

Extinguish open flame before space spraying. **DO NOT USE, POUR, SPILL OR STORE NEAR HEAT OR OPEN FLAME.**

DIRECTIONS FOR USE:

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

For use in hotels, motels, homes, institutions, packaging and processing plants, seed houses and horses stables.

SPACE SPRAY: To kill flies, mosquitoes and gnats. Remove or cover exposed food and food handling surfaces. Remove animals and plant life. Shut off ventilating systems, air ducts, air conditioning equipment and close off room of area to be treated. For use in either thermal or non-thermal equipment.

Use the product in food processing plants only when plant is not in operation. Food should be removed and covered during treatment. Facilities and equipment in federally inspected meat and poultry plants must be washed with an effective cleaning compound followed by a potable water rinse after spraying. Do not spray on food. Thoroughly ventilate treated area before re-entry.



07247100



ACTIVE INGREDIENTS:

Resmethrin
d-trans Allethrin

INERT INGREDIENTS*

TOTAL

*Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN
CAUTION:

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.

IF IN EYES: Flush with plenty of water. Call a physician if persists.

IF ON SKIN: Wash skin with plenty of soap and water. Get attention if irritation persists.

IF INHALED: Remove victim to fresh air. If not breathing, respiration, preferably mouth-to-mouth. Get medical attention.

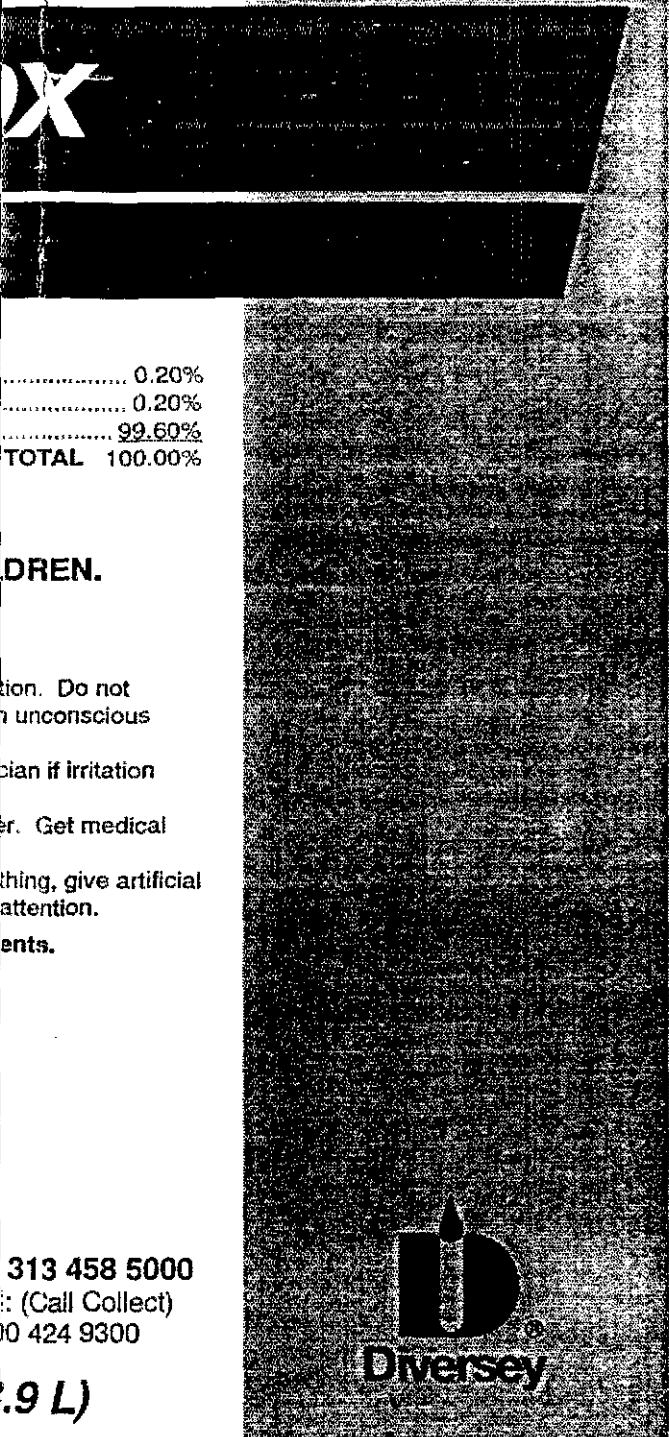
See left panel for additional precautionary statements.

Manufactured for:
Diversey Corp. • Livonia MI 48150-2193 • 313
24 HOUR EMERGENCY TELEPHONE • Medical: (C
303 592 1024 • Transportation: (CHEMTREC) 800 4

Net Contents 5 Gal (18.9

PMS Rhodamine Red • Size 15 x 8.5

EPA DRAFT



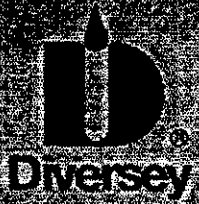
OX

..... 0.20%
 0.20%
 99.60%
TOTAL 100.00%

DREN.

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 n unconscious
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 thing, give artificial
 attention.
 ents.

313 458 5000
 : (Call Collect)
 0 424 9300
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Remove pets, birds and cover fish aquariums before spraying.

THERMAL APPLICATIONS: This formulation is to be used undiluted in only such portable thermal application equipment that can deliver spray particle sizes within the aerosol size range. Extinguish all flames and pilot lights. Apply as a dry fog at the rate of 1 1/3 fluid ounces per 1,000 cubic feet of space. Direct nozzle of thermal applicator toward the upper corners of the room and along the ceiling. Close off room for at least 1/2 hour. Do not remain in treated areas. Ventilate the area after treatment.

NON-THERMAL APPLICATIONS: Apply undiluted as a very fine mist through manually operated equipment or with electrical and other powered applicators. Avoid staining by holding the spray nozzle at least 5 feet from objects. Direct the fine spray mist toward the upper corners of the room. Fill the room with a fine mist space spray, at the rate of 5 fluid ounces per 5,000 cubic feet. Leave room closed for 1/2 hour. Ventilate thoroughly before re-entry.

CONTACT SPRAY: For control of roaches, ants, earwigs, grain mites, sowbugs, spiders and centipedes. Adjust sprayer to produce large wetting type spray particles. Direct spray to contact these insects in cracks and crevices in floors, baseboards, around pipes, behind cabinets and other harbourages. Spray these infested areas until thoroughly wet. Repeat as necessary.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store in original container away from heat or open flame.

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: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

EPA Registration No.: 875-165
 EPA Establishment No.: 9591-OH-2

(960105)X

ACCEPTED
 with COMMENTS
 in EPA Letter Dated

21 MAY 1996

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this product is registered under EPA Reg. No. 875-165