

PM-19

Reg # 1203-69

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

APR 22 1996

Rhonda York
Delta Foremost Chemical Corporation
3915 Air Park Street
Memphis, TN 38118

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Revised Label
Foremost 4891-ES Fly-Kil
EPA Reg. No. 1203-69
Your April 2, 1995 Application

Dear Ms. York:

The Agency has reviewed your April 2, 1996 submission of revised labels for the above product in response to our letter dated March 28, 1996. As requested, you submitted a new Confidential Statement of Formula dated April 2, 1996 plus an MSDS sheet for one of the inert ingredients (CBI ingredient). Also as requested, the revised label no longer contained the phrase "Extra Special."

However, the Agency has determined that the inert ingredient in question, based on the submitted MSDS sheet, should be labeled as an active ingredient. This is substantiated by the pesticidal claims on the label such as "... kills adults that feed upon or contact the crystals...". You will need to submit another application, listing that ingredient as an active ingredient on your label and CSF. However, this could jeopardize the product's status as a "me-too" registration. Alternately, you must remove all wording from your labeling that are pesticidal claims for that inert ingredient.

A stamped copy of the label, accepted with comments, is enclosed for your records. Please submit the revised labeling within 30 days. If you have any questions, please contact Teung F. Chin of my Team, at (703) 305-5412.

Sincerely yours,

DHE

Dennis H. Edwards, Jr.
Product Manager 19
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure
1203-69.DSF

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

DIRECTIONS

APPLICATION OF THIS PRODUCT IN THE FOOD AREA OF FOOD HANDLING ESTABLISHMENTS IS NOT PERMITTED.

DO NOT USE: Fly-Kil (as scatter bait or in bait stations) is not to be used inside or around homes, or any other place where children are likely to be present, or where milk is processed or stored or where poultry can feed on the crystal, inside poultry establishments, meat and food processing plants, and restaurants. Finished floors may be scratched if Fly-Kil is trodden under foot. To avoid skin contact when applying Fly-Kil, use a cup, scoop, or rubber gloves.

SCATTER BAIT: Use of scatter bait should be limited solely to commercial feed lots, broiler houses, livestock barns, canneries, beverage plants, meat and poultry establishments and food processing plants where children will not be present. Scatter Fly-Kil from container, avoiding direct handling of bait, where the crystals can remain dry as long as possible. Apply 3-4 ozs./100 sq. ft. Avoiding areas where animals can feed on bait.

POULTRY AND RABBITS ON WIRE: Scatter on the manure and other places that flies settle such as Feed Rooms and Egg Houses. Against adult flies, where the manure is dry, apply about one-third to one-half cupful every two or three yards. Treat all damp or wet places heavily at 1 to 1½ lbs. per 100 sq. ft. as described below for maggots.

POULTRY ON GROUND OR LITTER: Apply where poultry cannot feed upon the crystals. Use in manure pits under roosts against maggots and adults. Do not apply more than 1 lb. per 260 sq. ft. (2.5 lbs. per 650 sq. ft.) on Feed Room Floors where out of reach of poultry. Keep tightly closed when not in use to preserve killing power.

BAIT STATIONS: Bait stations must be placed at least four feet from the ground and inaccessible to children and food producing animals. Use Fly-Kil in bait stations where flies congregate and breed in and around such places as markets, cafes, parks, picnic groves, fairs and camps, zoos, porches, kennels, garbage cans, dumps and incinerators.

FLY-KIL GIVES YOU TWO WAY KILL: Fly-Kil is highly attractive to adult flies and kills adults that feed upon or contact the crystals if the crystals remain dry and within the reach of the flies. When moisture contacts the crystals the toxicant enters the moisture and is dispersed in all directions. In this manner the poison contacts the maggots and kills them.

FOR BOTH MAGGOTS AND ADULTS: Use 1 lb. to 1½ lbs. per 100 sq. ft. of area to be treated. Apply to the ground floors, litter, garbage, manure and similar areas where flies congregate or breed. Apply evenly and thoroughly to breeding areas. Repeat as needed for HOUSE FLY, BLOW FLY AND MAGGOTS.

**FOR CHEMICAL EMERGENCY CALL:
INFOTRAC 1-800-535-5053**

Rev. 4-2-96



**4891-ES
FLY-KIL**

ACTIVE INGREDIENTS

Methomyl (S-Methyl N-[(Methylcarbamoyl) Oxy])	1.2
Thioacetimidate	0.0
Z-9 Tricosene	98.7
INERT INGREDIENTS	98.7
TOTAL	100.0

SOLD FOR COMMERCIAL AND INDUSTRIAL PURPOSES

CAUTION:
KEEP OUT OF REACH OF CHILDREN.
See additional cautions on side panel

Delta Foremost Chemical

3915 AIR PARK STREET, MEMPHIS, TENNESSEE

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 22 1996

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

1203-69

DIRECTIONS *continued*

FOR ADULTS (winged) FLIES: Simply scatter the crystals where flies congregate. Never pile the crystals. Scatter them! For both quick and lasting reduction of flies: First, scatter the crystals over enough of the area that all the flies have an opportunity to feed upon or touch the crystals very soon; and, second, also treat as many places as possible where the crystals can remain dry and uncovered. Apply 5 times weekly until the fly population is reduced. After that apply as necessary. Use 3 to 4 oz. per 100 sq. ft. of area actually treated.

FOR MAGGOTS: Use more care. Scatter evenly and thoroughly over the entire infested area. Use about six inches or more around all sides. Thorough, even coverage is essential.

NOTE: DO NOT USE any Fly Bait, scatter or bait stations, where children are likely to be present.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Do not reuse empty container. Open dumping is prohibited. Dispose of in an incinerator or landfill approved for pesticide containers or bury in a safe place. Pesticides that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides or buried in a safe place away from water supplies. Consult federal, state or local disposal authorities for approved alternate procedures such as limited open burning.

Seller makes no warranty expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing dust. Avoid contact with eyes, skin, or clothing. Wash thoroughly after using and before eating or smoking. Avoid contamination of feed and foodstuffs.

FIRST AID: IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching finger to back of throat. If on **SKIN:** Wash thoroughly with soap and water. Call a physician if irritation persists. If in **EYES:** Flush with plenty of water. **NOTE TO PHYSICIAN:** Methomyl is a cholinesterase inhibitor. Atropine is antidotal.

Do not use this product in food areas of food handling establishments, restaurants, or other places where food is prepared or processed. Do not apply where poultry or animals, especially dogs or young calves, can pick it up or lick it.

ENVIRONMENTAL HAZARDS

Exposed surfaces treated with this product are hazardous to birds and other wildlife. Use with care when applying in areas frequented by wildlife or adjacent to any body of water. Do not contaminate water by cleaning of equipment or disposal of wastes.

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.

EPA Reg. 1203-69

EPA Est. No. 1203-TN-1