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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 8 1997

Mr. Zen J. Mukai
Tomic Insecticide Co. Inc.
241 S. Mednik Ave
Los Angeles CA 90022

Dear Mr. Mukai:

Subject: 8 Month Response to Silicon Dioxide/Silica Gel
Reregistration Eligibility Document (RED)
Tomic Micro-cide Dust
EPA Registration Number 1440-1
Your Letter Dated March 22, 1995

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or FIFRA sec.4 when the Agency requires all registrants of similar products to submit such data.

2. Based on the acute toxicity profile of the referenced product, EPA Reg. No. 4816-353, make the following label changes:

a. Revise the Hazards to Humans and Domestic Animals to read:

Harmful is absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with ~~soap~~ and water after handling. Containers larger than one pound may not be used or stored in food handling establishments.

b. Revise the Statement of Practical Treatment to read as follows:

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

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

c. Add a Note to Physician section to the label as follows:

Note to Physician: ~~may cause an aspiration pneumonia hazard.~~ **CONCURRENCES**

SYMBOL	IC-1						
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3. The words ACTIVE INGREDIENTS and INERT INGREDIENTS must be the same size and be given equal prominence on the label.

4. Add the statement "Contains petroleum distillates" in close proximity to the ingredients statement.

5. Revise the front panel statement to read "For Industrial/Commercial Use Only."

6. Qualify the term "thermally attrited hydrogel" with (silica gel).

7. Remove the statements under the Hazards to Humans and Domestic Animals referring to food areas and non-food areas and place them after the misuse violation statement under the Directions For Use section.

8. Under the Storage and Disposal section, revise the Pesticide Disposal statement as follows:

Pesticide or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

9. Use in mills, elevators and granaries is a food use. The product is labelled for use in non-food areas of commercial establishments. Therefore revise the Storage Product Pests paragraph to read as follows:

Pantry Pests: To avoid in control of ... (list insects) in pantries. Treat exposed stages. Apply dust in cracks and crevices behind and under cupboards and cabin etc. for residual control. Do not apply directly to food, utensils or food storage areas.

10. Submit two copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

Sincerely yours,

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

Enclosure

PROTECTS



BIRDS



CATS



DOGS

TOMIC MICRO-CIDE DUST

CONTAINS DRIONE® TO PROTECT AGAINST THE ENTRANCE OF DRYWOOD TERMITES
KILLS UP TO 6 MONTHS WHEN LEFT UNDISTURBED

CONTROLS: ANTS, COCKROACHES, SILVERFISH, BEDBUGS, FLIES, LICE, TICKS, STORED PRODUCT
PESTS, AND DRYWOOD TERMITES

RECOMMENDED FOR USE BY COMMERCIAL APPLICATORS

ACTIVE INGREDIENTS:

Amorphous Silica Gel	40%
*Piperonyl Butoxide, Technical	10%
Pyrethrins	1%
**INERT INGREDIENTS	49%
TOTAL	100%

Drione™

Drione™

*Equivalent to 8% (butylcarbityl) (6-propylpiperonyl) ether and 2% related compounds.

**Contains Petroleum Hydrocarbons.

Drione™ and Pyrenone™ -Registered trademarks of Roussel Uclaf Corporation

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements.
EPA Reg. No. 1440 1AA EPA EST. No. 1440-CA 1

TOMIC INSECTICIDE COMPANY, INC.

241 SOUTH MEDNIK AVENUE • LOS ANGELES, CALIFORNIA 90022

NET CONTENTS 1 LB. (16 OUNCES)

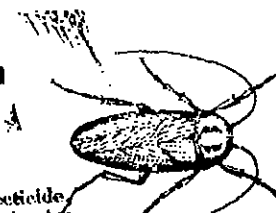
USED SUCCESSFULLY IN



HOME'S

RESTAURANTS

USED EXTENSIVELY FOR



ROACHES

ACCEPTED
with COMMENTS
in EPA Reg. No. 1440-1
Dated
NOV 1997
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
registered with EPA Reg. No.
1440-1

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TOMIC MICRO-CIDE DUST

This product is a high quality powder which combines the insect flushing and killing actions of pyrethrins and piperonyl butoxide (Pyrenone[®]) with dehydrate principal of thermally atrited hydrogel. It is odorless and nonstaining and may be used in various suitable locations, in homes, and nonfood areas of restaurants, stores and hotels.

DIRECTIONS FOR USE

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

APPLICATIONS WITHIN NONFOOD AREAS: Nonfood Areas-Includes garbage rooms, lavatories, floor drains (to sewers), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning and bottling).

To control crawling insects such as ants, cockroaches, silverfish, firebrats, spiders, boxelderbugs, ticks, lice, and fleas distribute TOMIC MICRO-CIDE DUST at the rate of 2 ounces per 100 square feet of surface area. Apply a continuous visible film underneath and behind moldings, shelving, baseboards, pipe openings, cracks, crevices, and other areas where insects hide. For severe infestations, apply TOMIC MICRO-CIDE DUST behind cabinets and walls, in crawl spaces and attics at the rate of 16 ounces per 1000 square feet of surface areas. Repeat treatment as necessary.

STORED PRODUCT PESTS: To aid in the control of cadetles, cheese mites, cigarette beetles, confused flour beetles, dark meal worms, drugstore beetles, grain mites, granary weevils, sawtoothed grain beetles, and yellow meal worms in mills, elevators and granaries. Clean up waste materials, dust, dirt and any other debris. Thoroughly treat floors, walls, and other surfaces in bins, storage and handling areas. Apply to cracks and crevices and other difficult to reach areas where insects may hide.

BEDBUGS: Take bed apart. Dust into joints and channels. If hollow, such as square or round tubing, see to it that the interior of frame work is well dusted. Mattresses should be dusted, especially tufts, folds, and edges. Picture frame moldings and all cracks and crevices in the room should be treated.

MITES-CAGED OR PET BIRDS: Do not apply a thick layer of TOMIC MICRO-CIDE DUST. Keep bird's face away from dust. Remove water and feed before dusting. Do not squeeze bird's body during application. Get powder down to wings and body. Dust nests and infested quarters too. Repeat as necessary. Do not use on poultry.

LICE-FLEAS AND TICKS ON DOGS AND CATS: Liberally apply powder to the animal. Rubbing thoroughly into the skin. Begin with neck and include the underbody, legs, feet and base of the tail. Repeat as necessary. Surfaces of kennels should be dusted at the rate of 1 ounce per 50 square feet. Heavily infested lawns, basements, and crawl spaces should be dusted at the rate of 16 ounces per 1000 square feet. Repeat as necessary. DO NOT treat kittens or puppies less than four weeks old.

TO PROTECT AGAINST ENTRANCE OF DRYWOOD TERMITES: Using an electric or hand operated rotary duster, distribute TOMIC-CIDE DUST through an entry, e.g., crawl hole into attic and crawl space of building, at the rate of 1 pound per 1000 square feet of floor area. All vents and blowers on the windward side should be closed. All wood surfaces should be covered. In case of localized infestations probe to locate galleries and drill holes to inject product into the galleries.

If a reasonable heavy infestation has already developed, fumigation should be employed.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. **PESTICIDE STORAGE AND SPILL PROCEEDURES:** store upright at room temperature. Keep away from moisture. Sweep up and dispose of with chemical waste. **PESTICIDE DISPOSAL:** Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of by an approved waste disposal facility. **CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated it cannot be reused, dispose of in same manner. **CONTAINERS ONE POUND AND SMALLER:** Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Avoid inhalation. 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 foods may be prepared or held.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Not for Use in USDA Meat and Poultry Plants.

STATEMENTS OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting unless directed by a physician. Contains Petroleum Hydrocarbons. Contact physician or Poison Control Center immediately. **IF INHALED:** Remove victim to fresh air. Apply artificial respiration if indicated. **IF ON SKIN:** Remove contaminated clothing and wash affected areas with soap and water. **IF IN EYES:** Flush with plenty of water. Call a physician if irritation persists.

Buyer assumes all the risks of use, storage or handling of this product not in strict accordance with directions given herewith.

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