



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 8, 2005

NCH Corporation
Research and Development
ATTN: Ms. Lisa Boynton
Regulatory Specialist
2730 Carl Road
Irving, TX 75062-6405

**Subject: Revised Labeling In Response to PRB Label Assessment
KILZONE™ Residual Spray
EPA Registration No. 1769-164
Your Submission Dated January 8, 2004**

Dear Ms. Boynton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provisions:

Ingredient Statement section:

1. Change "Net Weight" to "Net Contents."

First Aid section:

2. Please note that the Agency recommends that you insert the following sentence at the very end of the "First Aid" section: "You may call 1-800-xxx-xxxx for emergency medical treatment information." so that it appears as a 2nd sentence directly after the statement starting with "Have the product container..."
3. Since KILZONE™ Residual Spray contains petroleum distillates, delete the subsection entitled "IF SWALLOWED" in its entirety and replace with: "IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give **any** liquid to the person. Do not give anything by mouth to an unconscious person."

Note to Physician section:

4. Delete the existing 4 sentences in the "NOTE TO PHYSICIAN" section and replace with the following: "Contains petroleum distillate – vomiting may cause aspiration pneumonia. Contains an N-methyl carbamate that inhibits cholinesterase. Atropine by injection is antidotal and should be administered only if signs of cholinesterase inhibition have appeared."
5. The existing antidotal comment about 2-pam may be left on the label.

Precautionary Statements, Hazards to Humans and Domestic Animals section:

- 6. Delete the 2 sentences starting with "Harmful if swallowed...", the existing PPE section and the "User Safety Recommendations" in their entirety and replace with the following text in its own text box on the label as follows:

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin or clothing. Avoid contamination of food, utensils and food preparation areas. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Continued exposure to this product will increase susceptibility to it and other cholinesterase inhibitors. Wear chemical-resistant gloves such as such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber, or Viton; and protective clothing: long-sleeved shirt and long pants, socks and shoes. Keep all unprotected persons out of operational areas.

Storage and Disposal section:

- 7. Delete the existing "Storage and Disposal" section in its entirety and replace with the following:

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

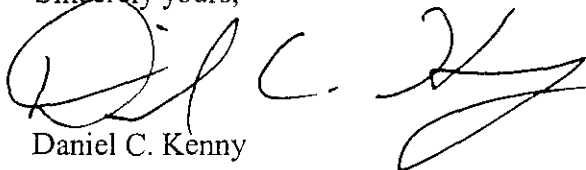
STORAGE: Keep this product dry in a tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat or open flames.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: This container may be recycled in aerosol recycling centers. At present, there are only a few such centers in the country. Before offering for recycling, empty the can by using the product according to the label (DO NOT PUNCTURE!). If recycling option is not available, discard in the trash.

A stamped copy is attached for your records. Please submit one (1) final printed copy of the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding the label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Daniel C. Kenny
 Product Manager (01)
 Insecticide-Rodenticide Branch
 Registration Division (7505C)

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[Front Panel]

KILZONE™

Residual Spray

LASTS FOR FOUR WEEKS

ACTIVE INGREDIENT

2-(1-Methylethoxy) Phenol Methylcarbamate 1.0%

OTHER INGREDIENTS* 99.0%

TOTAL 100.0%

*Contains petroleum distillates

Contains no CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols. (No CFC's logo)

KEEP OUT OF REACH OF CHILDREN

CAUTION

CONTENTS UNDER PRESSURE

(See the side panels for additional precautions.)

EPA Reg. No. 1769-164

EPA Est. No. 4140-TX-1

NET WEIGHT: 12 oz/340 g

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

FEB 8 2005

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

1769-164

[Side Panels]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Apply this product only as specified on this label.

GENERAL INFORMATION

KILZONE is a formulation that provides rapid kill and long residual action indoors and is effective against the following insects, including those resistant to certain chlorinated hydrocarbon and phosphate insecticides: Ants, Crickets, Flies (outdoors only), Roaches, Sowbugs, Brown Dog Ticks, Earwigs, Millipedes (outdoors only), Scorpions, Spiders, Clover Mites, Mosquitoes (outdoors only), Silverfish, Saw-toothed Grain Beetles (exposed stage).

Kills Roaches, Ants, Spiders, Brown Dog Ticks, Earwigs in and around buildings.

For industrial and institutional use in packaged food storage areas, around doors, windows and baseboards, in and around schools, hospitals, municipal buildings, industrial plants and offices, apartment buildings, kennels and rest homes.

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not apply as a landscape treatment (to lawns, shrubs, trees, or garden plants).

Do not apply to drapes, wallpaper, carpets, rugs, or similar materials that may be stained.

Avoid excessive wetting of rubber, plastic, and asphalt surfaces such as tiles and floor coverings.

Do not apply this product in a way that will contact any person or pet, either directly or indirectly.

Keep people and pets out of the area during application.

Do not allow people or pets to enter the treated area until sprays have dried.

Do not point the spray towards people, plants, or pets.

Avoid contamination of food, utensils, and food preparation areas.

Spray only on surfaces.
Do not use as a space spray.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

APPLICATION INSTRUCTIONS

INDOOR APPLICATION: Ants, cockroaches, crickets, scorpions, spiders, saw-toothed grain beetles (exposed stage), silverfish, water bugs: spray into cracks, crevices, around baseboards, windows, doors and similar passageways for these insects.

Apply behind and beneath cabinets, refrigerators, sinks, stoves and in and around waste containers. For ants, spray trails and places where ants enter premises. Do not treat foodstuffs or house plants. Remove pets and cover fishbowls before spraying. Do not allow children to contact treated surfaces until the surfaces are completely dry. Repeat as necessary.

BROWN DOG TICKS: Spray sleeping quarters of pets around baseboards, window frames and door frames and wall cracks. Repeat as necessary. Do not spray open floor areas, carpets, furniture, beds or bedding. Old bedding of pets should be removed and replaced with clean, fresh bedding after treatment of pet areas. Additionally, treat pets with an E.P.A.-approved product registered for direct application to pets. **DO NOT** spray pets.

APPLICATION WITHIN FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS

FOOD HANDLING ESTABLISHMENTS: Places other than private residences in which exposed food is held, processed, prepared or served.

FOOD AREAS - APPLICATION LIMITED TO CRACK AND CREVICE TREATMENT ONLY.

Includes areas for receiving, storing, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation) also would be considered a food area.

Apply a small amount of KILZONE by spraying, using an injection or insertion tube, directly into cracks and crevices such as expansion joints between different elements of construction or between equipment bases and floor, wall voids, motor housings, junction boxes or switch boxes, conduits or hollow equipment legs where ants, cockroaches, silverfish, spiders, saw-toothed grain beetles and water bugs hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air.

OUTDOOR APPLICATION: Ants, clover mites, crickets, earwigs, flies, millipedes, mosquitoes, sowbugs and brown dog ticks: Treat infested areas thoroughly including outdoor surfaces of screens, doors, window frames, foundations, patios or other places where insects may enter. For ants, treat hills and runways. Repeat when necessary. Do not spray vegetation.

HOW TO USE: Unlike most pressurized bombs, KILZONE emits a small, direct spray to a distance of 6 feet. Cracks, crevices and hard-to-reach locations can be easily treated without bending, crawling or climbing. Treat the surfaces until wet, moving the spray stream rapidly to prevent excessive wetting and waste of material.

STORAGE AND DISPOSAL
Do not contaminate water, food, or feed by storage and disposal.
PESTICIDE STORAGE: Do not use or store near heat or open flame.
PESTICIDE AND CONTAINER DISPOSAL: This container is made with at least 25% recycled steel and may be recycled in the few but growing number of communities where (steel) aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. **DO NOT PUNCTURE OR INCINERATE.** If recycling is not available, wrap the container and discard in the trash.

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin, or clothing.

Personal Protective Equipment (PPE)

Mixers, loaders, and others exposed to propoxur must wear:

Long-sleeved shirt and long pants.

Socks and shoes,

Chemical resistant gloves (such as barrier laminate, neoprene rubber, nitrile rubber, or viton).

USER SAFETY RECOMMENDATIONS
Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
Users should remove PPE immediately after handling this product. Wash the outside of the gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

FIRST AID

IF SWALLOWED

- ◆ Call a poison control center or doctor immediately for treatment advice.
- ◆ Have person sip a glass of water if able to swallow.
- ◆ Do not induce vomiting unless told by a Poison Control Center or doctor.
- ◆ Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING

- ◆ Take off contaminated clothing.
- ◆ Rinse skin immediately with plenty of water for 15-20 minutes.
- ◆ Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: Contains petroleum distillate. This product may pose an aspiration pneumonia hazard. If symptoms of cholinesterase inhibition are present, atropine sulfate is antidotal. 2-pam is also antidotal and may be administered in conjunction with atropine.

PHYSICAL AND CHEMICAL HAZARDS

Flammable. 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. Prior to application, de-energize electrical equipment. Allow time for oil to evaporate before starting motors or placing switches in the "ON" position whenever the product is applied on the electrical equipment.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and aquatic invertebrates. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

See the Material Safety Data Sheet for potential chronic hazards and for more information.
For medical or environmental emergencies, call CHEMTREC® at 1-800-424-9300.

Not for Resale
MADE IN THE U.S.A.
0M307 • 5029NCAA

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TO REORDER
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