360/361 11/17 3/4 JUN 18 1986

Athens Products Corporations:
1919 Lone Star Drivers:
Dallas, The 752124

Dear Mr. Wissmans

Subject: Amendment-Additional Brand Hame/Labeling Update
Echols Ho-Rosch/Echols Rosch Killer and Echols Ho-Rosch Kit
EFR Registration Ho. 2019-27 and 3541-24
Your Letters Dated February 6, 1985 and January 29, 1986

The amendments referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

- 1. The additional brand names "Echols No-Roach Kit" and "Johnston's No-Roach Kit" are acceptable names.
- The following comments refer to Echols Roach Killer, EPA Registration No. 3941-24.
 - a. The ingredient statement is very difficult to read. We suggest as enlargement of the print.
 - b. You must add to the front panel the following:

KEEP OUT OF REACH OF CHILDREN CAUTION

This should follow the patent number.

- c. Following the signal word "CAUTION" add the referral statement
 "See back panel for additional cautions."
- d. The "Directions for Use" heading and wording should be preceded by the Precautionary Statements and Statement of Practical Treatment.

86053:Shell:LR-13:KENCO:6/10/86:6/16/86:sj:lf R86099:Shell:LR-13:KENCO:6/16/86:6/6/26/86:dsg:dsg

- e. Following the "Directions for Use" add the heading "Storage: and Disposal" followed by the wording, "Securely wrap container in several layers of newspaper and discard in trash. Do not reuse container."
- f. We suggest underlining "If Swallowed:, If Inhaled:, If on Skin:, If in Eyes:, and "Note To Physician:" subheadings. The use of colone is also useful in making these subheadings easier to identify.

The above information appeared on your previous labeling but was omitted from the finished label copy.

- 3. The following comments refer to Echols Ho-Roach Spray On, EPA Registration No. 2019-27.
 - a. The child warning statement should precede the signal word "CAUTION."
 - b. Preceding the "Misuse Statement" add the heading, "Directions for Use."
 - c. As was indicated in 2f please underline the Statement of Practical Treatment subheadings.
 - d. In the Note to Physician Statement revise the wording to read ". . . and may be administered in conjunction with atropine." We have added the words "in conjunction."
 - e. As was mentioned in 2d the "Directions for Use" must precede the "Precautionary Statements." Please change accordingly.

Please submit five (5) copies of your final printed labeling before you release the product for shipment.

Sincerely yours,

George T. LaRocca Product Manager (15) Insecticide-Rodenticide Branch Registration Division (TS-767C)

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

Kit Copy



EFFECTIVE Combination Treatment Kills and Controls Roaches!



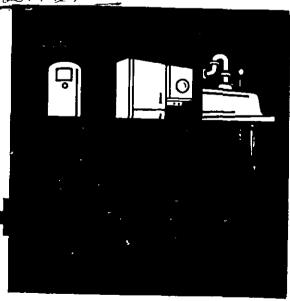
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A KPA Lotter Dated:

JUN 1 9 1986



6 Ready-to-Use Bait Trays for use in kitchen cabinets and pantry closets



PRECATIONARY STATEMENTS: PAZAROS TO HUMANS AND DOMESTIC AN MALS CANTING XIND ON A FEW mach of chicken happing for translation of the state of the st

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PERFECTOR DISPOSAL: Security with angular annium on several layers of news pages and discount on passa. Continuent disposal: to not truse container (borne) sonce thoroughly be due consulting in passh. Ethi Reg. No. 2019-27 AA. EPA 631 No. 4350 N.J.-1

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DALLAS, TEXAS 75212



earl Ingradients. O.O. Canadad College out only in Control Marcaglia.

CAUTION: Keep out of the reach of children. See side panel for other cautions. Net contents 8 FL. OZ.

EFFECTIVE ROACH CONTROL

EASY TO APPLY

COCKROACHES - WATERBUGS

R is a violation of federal law to use this product in a manner inconsistent with its labeling. No-Roach protects your home against reaches, and systemish and withrough. Spray or brosh Ho-Roach in cabinals, cupboards, shelms; around sink and baseboards. wherever you see reaches. No-Roach is easy to apply. It is first to form an invisible odorless coalling. Coalling is water removable flemove dishes and other flems in Cupboards and cabinets before applying Johnston's Ho-Roach "Spray it On." Allow to dry before replacing terms.



ANTS . SILVERFISH

For aris brush trass, doorsis and wordow trames Also around openings where anis may enter. For stirerlish brush baseboards, behind shelving. Apply Ne-Boxh into cracks, credices and around water pipes. Repeat when necessary.

GASTON JOHNSTON CORPORATION

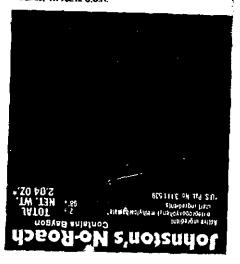
Directions for Rouches, Ants, and Waterbugs: It is a violation of federal law to use this product in a manner inconsistent with its labeling. Place opened bait containers in several locations in each room where insects are seen or suspected. Place in cabinets, closets, behind or under fixtures and other areas where children and pets cannot reach. Repeat treatments as needed to maintain control by replacing bait containers.

PRECAUTIONARY STATEMENTS: HAZARD TO HUMANS AND DOMESTIC ANIMALS, CAUTION: May be harmful is swallowed or absorbed through the skin Do not contain male food or foodstuffs. Avoid prolonged skin contact wash throughly alter transport Wash throughly after using

Statement of Practical Treatment: If swallowed, call Statement of Practical Treatment: If swallowed, call physician or Poison Control Center immediately Drink one or two glasses of water and induce vormiting by touching the back of throat with a linger Bo not induce vormiting or give anything by mouth to an unconscious or convulsing person. If inhaled, temove victim to fresh air Apply artificial respiration of 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. Note to physician, if symptoms of cholinesterase inhibition are present, alropine sulfate is antidotal. 2-Pam is also antidotal and may be administered in conjunction with atropine.

EPA Registration No. 3941-24-AA-2019 EPA Est. 3941-TX-1

Mfg. by Athena Products Corporation Sold by Easton Johnston Corporation Dallas, TX 75212 U.S.A.



BEIT