

28 APR 1994

Mr. Michael J. Rath  
Empire Chemical Company, Incorporated  
715 Lamar Street  
Los Angeles, CA 90031

Dear Mr. Rath,

Subject: General Label Update  
Roachkil  
EPA Registration Number 2098-9  
Submission Received March 22, 1994

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 comments listed below. Three (3) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the product label is enclosed for your records.

1. Submit a current Confidential Statement of Formula to the Agency for the record.
2. The label text "U.S.D.A. F1" is not appropriate. Please delete this text from the product label.
3. Include an appropriate application rate for this formulated product within the statement "SPRAY OR FOG INFESTED AREAS THOROUGHLY".
4. Include the following statement within the PRECAUTIONARY STATEMENTS section of the product label.  
  
All benches, shelving, food processing surfaces, and utensils must be covered or removed during treatment, or thoroughly washed with an effective cleaning compound followed by a potable water rinse prior to use.
4. Revise the heading DIRECTIONS to read DIRECTIONS FOR USE.
5. Delete the statement "IT CAN BE USED AROUND FOOD PRODUCTS AND UTENSILS, BUT SHOULD NOT BE APPLIED DIRECTLY TO FOOD OR FOODSTUFFS."
6. You may delete the inert ingredient declaration "PETROLEUM HYDROCARBONS", as it is not necessary to list the specific inert ingredient contained in the product. The following declaration would suffice.

INERT INGREDIENTS ..... 98.80%

CONCURRENCES							
SYMBOL	7. Add the following statement as a footnote to the ingredients statement: Contains petroleum distillates.....						
SURNAME							
DATE							

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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- 8. You may delete the statement "HARMFUL IF SWALLOWED" which appears on the front panel of the product label.
- 9. Expand the statement "DO NOT INDUCE VOMITING" to read "DO NOT INDUCE VOMITING DUE TO ASPIRATION PNEUMONIA HAZARD".
- 10. This product is currently labeled for indoor use. You may eliminate the ENVIRONMENTAL HAZARDS section of the product label.

Sincerely,



Mr. Robert S. Brennis  
Acting Product Manager 10  
Insecticide-Rodenticide Branch  
Registration Division

CONCURRENCES

SYMBOL								
SURNAME								
DATE								



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**EMPIRE CHEMICAL CO., INC.**

715 LAMAR ST. - LOS ANGELES, CA 90031 - (213) 225-4186 - FAX:(213) 221-7047

**CLEANING - SANITATION - MAINTENANCE SUPPLIES**

## **ROACHKIL**

(LABEL ADDENDUM)

### DIRECTIONS:

NOTE: IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

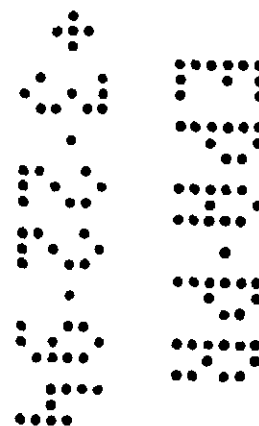
**TO CONTROL ROACHES, SILVERFISH, SPIDERS, ANTS, BEDBUGS AND SCORPIONS:** SPRAY OR FOG INFESTED AREAS THOROUGHLY. DIRECT SPRAY OR FOG BEHIND BASEBOARDS, MOLDING, CABINETS, SHELVES, SINKS, DOOR AND WINDOW FRAMES, AND PIPES. BE PARTICULARLY THOROUGH IN DIRECTING THE SPRAY OR FOG INTO CRACKS, CREVICES, RECESSES AND SIMILAR HIDING PLACES. KEEP DOORS AND WINDOWS CLOSED FOR 10 MINUTES AFTER SPRAYING.

**AGAINST ANT INFESTATIONS:** TREAT SHELVES, CABINETS AND STORAGE AREAS; SPRAY ANT RUNS, TRAILS BASEBOARDS, THRESHOLDS AND OTHER PLACES OF ENTRY AND TREAT NESTS LIBERALLY.

**FOR BEDBUG CONTROL:** APPLY AS SPRAY TO JOINTS AND RAILS OF BEDSTEADS AND TO MATTRESS AROUND THE EDGING AND SEAMS, AND BASEBOARDS.

**DO NOT REMAIN IN TREATED AREAS AND VENTILATE THE AREA AFTER TREATMENT IS COMPLETED.**

U.S.D.A. F1  
E.P.A. EST. NO. 2098-CA-1  
E.P.A. REG. NO. 2098-9



**PRECAUTIONARY STATEMENTS:  
HAZARD TO HUMANS & DOMESTIC ANIMALS**

**CAUTION:**

HARMFUL IF SWALLOWED OR ABSORBED THROUGH THE SKIN. AVOID BREATHING SPRAY MIST. AVOID CONTACT WITH SKIN, EYES, OR CLOTHING. DO NOT ALLOW CHILDREN TO CONTACT TREATED AREAS UNTIL SURFACES ARE THOROUGHLY DRY. DO NOT STORE NEAR FEED OR FOOD PRODUCTS. AVOID CONTAMINATION OF FEED, FOOD, FOOD PROCESSING EQUIPMENT, AND FOOD HANDLING SURFACES. REMOVE PETS AND COVER FISH BOWLS BEFORE SPRAYING. DO NOT SPRAY PLANTS.

**DIRECTIONS:**

NOTE: IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. SEE LABEL ADDENDUM BEFORE USING.

**STATEMENT OF PRACTICAL TREATMENT**

IF SWALLOWED: DO NOT INDUCE VOMITING. NEVER GIVE ANYTHING BY MOUTH IF VICTIM IS UNCONSCIOUS OR CONVULSING. IMMEDIATELY CONTACT THE POISON CONTROL CENTER OR PHYSICIAN.

IF INHALED: MOVE VICTIM TO FRESH AIR. PROVIDE ARTIFICIAL RESPIRATION IF NECESSARY. CONTACT PHYSICIAN.

IF IN EYES: IMMEDIATELY, RINSE WITH PLENTY OF WATER. CONTACT PHYSICIAN.

IF ON SKIN: WASH AFFECTED AREA WITH WATER. IF IRRITATION PERSISTS CONTACT PHYSICIAN.

**ONE GALLON**

# ROACHKIL

ROACHKIL CONTAINS PIPERONYL BUTOXIDE AND PYRETHRINS. IT IS AN EFFECTIVE, FAST ACTING INSECTICIDE FOR THE CONTROL OF ROACHES, ANTS, SPIDERS, SILVERFISH AND SCORPIONS FOUND IN FOOD PROCESSING PLANTS, INSTITUTIONS, BUILDINGS, AND SHIPS. IT CAN BE USED AROUND FOOD PRODUCTS AND UTENSILS, BUT SHOULD NOT BE APPLIED DIRECTLY TO FOOD OR FOODSTUFFS.

ACTIVE INGREDIENTS:	TECHNICAL PIPERONYL BUTOXIDE*	1.00%
	PYRETHRINS	0.20%
INERT INGREDIENTS:	PETROLEUM HYDROCARBONS	98.80%
TOTAL:		100.00%

\*EQUIVALENT TO 0.80 OF (BUTYLCARBITYL)-(6-PROPYLPIPERONYL) ETHER AND 0.20 OF RELATED COMPOUNDS.

**KEEP OUT OF REACH OF CHILDREN.**

**CAUTION:**

**HARMFUL IF SWALLOWED.**

(SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS)

**ENVIRONMENT**

FOR TERRESTRIAL USES, DO NOT TREAT AREAS WHERE SURFACE WATER OR SUBSURFACE AREAS BELOW THE MEAN FLOODING LEVELS CONTAMINATE THESE AREAS. PROTECT FROM DISPOSAL OF EQUIPMENT WASHINGS.

**STORAGE AND DISPOSAL**

STORAGE: STORE IN A COOL, DRY PLACE. PERIODICALLY INSPECT STORAGE AREAS FOR VENTILATION. DO NOT CONTAMINATE STORAGE AND DISPOSAL.

IN CASE MATERIAL IS SPILLED: COVER WITH MAXIMUM VENTILATION. CLEAN UP SPILLAGE WITH PROPER PROTECTION TO AVOID CONTACT WITH AN INERT MATERIAL. PUT CONTAMINATED COVER AREA WITH CAUSTIC SOLUTION. WASH WITH WATER AND SCRUB THOROUGHLY. DISPOSAL: FOR PLASTIC ONE OR MORE REUSE EMPTY CONTAINER. WRAP FOR METAL 15, 30, AND 55 GALLON EQUIVALENT), THEN OFFER FOR RECYCLING OR PUNCTURE AND DISPOSE OF ACCORDING TO OTHER PROCEDURES APPROVED BY THE REGIONAL OFFICE FOR GUIDANCE.

NOTE: PESTICIDE WASTES ARE SUBJECT TO FEDERAL LAW. IF THESE WASTES ARE ACCORDING TO LABEL INSTRUCTIONS FOR PESTICIDE OR ENVIRONMENTAL PROTECTION. HAZARDOUS WASTE REPRESENTATION REGIONAL OFFICE FOR GUIDANCE ACCORDANCE WITH ALL FEDERAL REGULATIONS.

U.S. DEPARTMENT OF AGRICULTURE  
EPA EST. 100-100-0000  
EPA REG. NO. 100-100-0000

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

28 APR 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2008-9

**BEST AVAILABLE COPY**