

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

19 MAY 1994

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

Dear Mr. Rath,

Subject: General Label Update
 Repelocide
 EPA Registration Number 2098-29
 Submission Dated March 16, 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. Add the following statement to the paragraph on the front panel of the product label which begins "An insecticide formulation combining....": Do not use on horses intended for food.
2. Delete the word "new" which appears in the statement "A new insecticide formulation...." as this is not appropriate for a product which is not new.
3. Revise the numerical declarations "1.016" and "0.254" which appear in the footnote to the ingredients statement to read "1.016%" and "0.254%".
4. Add the following text to the **PRECAUTIONARY STATEMENTS** section of the product label: Only for use in the non-food areas of food processing facilities.
5. You may delete the inert declaration "PETROLEUM HYDROCARBONS" if you so choose. However, if you elect to delete this specific declaration, add the following text as a footnote to the ingredients statement: Contains petroleum hydrocarbons.
6. Expand the statement "DO NOT INDUCE VOMITING" to read "DO NOT INDUCE VOMITING DUE TO ASPIRATION PNEUMONIA HAZARD".
7. Expand the **IF ON SKIN** statement to read: WASH AFFECTED AREA WITH SOAP AND WARM WATER. IF IRRITATION PERSISTS, CONTACT A PHYSICIAN.

CONCURRENCES

SYMBOL	8. Revise the heading DIRECTIONS to read DIRECTIONS FOR USE.						
SURNAME							
DATE							

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9. Revise the statements which begin "THOROUGHLY AND REPEATEDLY SPRAY...." to delete the words AND REPEATEDLY.

10. Provide a rate of application of the product in each of the separate paragraphs under the DIRECTIONS FOR USE section. The **HORSES AND COLTS** paragraph already contains an application rate of 1 ounce per animal. Does this one ounce horse application rate apply to both adult horses and to foals?

11. Add the following statement directly after the heading **FOR FLY CONTROL IN HORSE BARN AND OUTSIDE AREAS**: Remove horses from the barn prior to treatment of the premises.

12. Add the following text to the **HORSES AND COLTS** section of the product label: To apply product to face of animal, spray on cloth and rub onto face. Avoid the eyes and mouth of the animal. Do not use on horses intended for food.

13. Submit a current **Confidential Statement of Formula** to the Agency for the record.

14. The term "U.S.D.A. F1" is not a recognized label declaration. Either provide the rationale for including this term on the label, or delete it from the label text.

15. The EPA Establishment Number which is declared on the label, "2098-29-CA-1", is not appropriate. Verify the establishment number and revise the label accordingly. Questions concerning this number may be addressed to Ms. Ann Stephanos at (202)260-3438.

It has been noted for the record that the formulation component PETROLEUM HYDROCARBONS has been declared as an inert ingredient in this pesticide product. Please be sure to revise the **Confidential Statement of Formula (CSF)** accordingly prior to submitting the updated CSF to the Agency for review.

Sincerely,



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

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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

REPELOCIDE

A NEW INSECTICIDE FORMULATION COMBINING HIGH KILL AND USEFUL REPELLENCY. CAN BE USED ON AND AROUND HORSES, COLTS, FOR THE CONTROL OF HORSE AND FACE FLIES. EXCELLENT FOR USE IN RESTAURANTS AND FOOD PROCESSING PLANTS. ALSO USE IN CORRALS AND HORSE BARN. KILLS AND REPELS ON CONTACT.

ACTIVE INGREDIENTS:	BUTOXPOLYPROPYLENE GLYCOL	5.00%
	TECHNICAL PIPERONYLBUTOXIDE*	127%
	PYRETHRINS	0.13%
INERT INGREDIENTS:	PETROLEUM HYDROCARBONS	93.60%
TOTAL:		100.00%

*EQUIVALENT TO 0.016 OF (BUTYL CARBITYL)-(6-PROPYLPIPERONYL) ETHER AND 0.254 OF RELATED COMPOUNDS

KEEP OUT OF REACH OF CHILDREN.

CAUTION:

HARMFUL IF SWALLOWED.

(SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS)

ENVIRONMENTAL

FOR TERRESTRIAL USES, DO NOT APPLY TO AREAS WHERE SURFACE WATER OR AREAS BELOW THE SURFACE OF THE WATER. CONTAMINATE THESE AREAS. DISPOSAL OF EQUIPMENT W

STORAGE

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

IN CASE MATERIAL IS SPILLED:

MAXIMUM VENTILATION.

PROPER PROTECTION TO AVOID CONTACT WITH AN INERT MATERIAL.

COVER AREA WITH CAUSTIC.

WASH WITH WATER AND SOAP.

DISPOSAL: FOR PLASTIC ONE

REUSE EMPTY CONTAINER.

FOR METAL 15, 30, AND 60 DAY

EQUIVALENT). THEN OFFER FOR

OR FURNITURE AND DISPOSAL

OTHER PROCEDURES APPROVED

NOTE: PESTICIDE WASTES

EXCESS PESTICIDE, SPRAY MIST

FEDERAL LAW. IF THESE W

ACCORDING TO LABEL INSTRUCTIONS

PESTICIDE OR ENVIRONMENTAL

HAZARDOUS WASTE REPORTING

REGIONAL OFFICE FOR

ACCORDANCE WITH APPROPRIATE

REGULATIONS.

EPA
EPA

ACCEPTED
with COMMENTS
In EPA Letter Dated

19 MAY 1994

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

2068-59

DIRECTIONS:

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

FOR CONTROL OF FLIES, ROACHES, WATERBUGS, SILVERFISH, AND SPIDERS: THOROUGHLY AND REPEATEDLY SPRAY OR FOG THE INFESTED AREA AND SURFACES. WORK THE SPRAY INTO CRACKS AND OTHER HIDING PLACES. SPRAY THE INSECTS DIRECTLY WHENEVER POSSIBLE. REPEAT APPLICATION AT REGULAR INTERVALS.

FOR CONTROLLING ANTS: THOROUGHLY AND REPEATEDLY SPRAY THE INFESTED AREA, WORKING THE SPRAY INTO CRACKS AND OTHER HIDING PLACES. SPRAY ANT TRAILS AND AREAS AROUND DOOR SILLS AND WINDOW FRAMES WHERE THE PESTS ENTER THE PREMISES. REPEAT APPLICATION AT REGULAR INTERVALS.

FOR FLY CONTROL IN HORSE BARNs AND OUTSIDE AREAS: THOROUGHLY CLEAN BARNs, FEED BINS AND TROUGHS, REMOVING MANURE, FEED DROPPINGS AND OTHER WASTE. REMOVE MANURE PILES OFTEN AND SPRAY PILES REGULARLY TO KEEP FLY POPULATION AT A MINIMUM. TIME SPENT IN A THOROUGH CLEANING OPERATION WILL BE WELL REPAID. USE HIGH FOG ELECTRIC SPRAYER PREFERABLY. THOROUGHLY SPRAY WALLS AND CEILINGS. FOG THE ENTIRE AREA, FILLING THE ROOM WITH MIST AND KEEPING CLOSED FOR 10 TO 15 MINUTES.

HORSES AND COLTS: HORSES SHOULD BE SPRAYED LIGHTLY JUST BEFORE LEAVING THE STABLE. CARE SHOULD BE TAKEN TO SPRAY ALL PARTS OF THE ANIMAL. ABOUT 1 OZ OF SPRAY IS SUFFICIENT FOR EACH ANIMAL. THIS TREATMENT WILL REPEL HORSE FLIES, FACE FLIES AND MOSQUITOS.

U.S.D.A. F1
E. P. A. EST. NO. 2098-29-CA-1
U.S.D.A. REG. NO. 2098-29

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