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NOV 6 1986

Mr. Lawrence L. O'Brien  
Vice President, Products Director  
The Hugel Company  
7625 Page Boulevard  
St. Louis, MO 63133

Dear Mr. O'Brien:

Subject: Amendment - Data Call-In Mineral Oil/Revised Label  
Confidential Statement of Formula  
Excelcide Formula #22  
EPA Registration No. 2270-225  
Your Letter Dated January 17, 1986

As you were already aware, the Data Call-In for Mineral Oil was deferred in the Spring of 1986. Although it was deferred we have reviewed the information submitted in order to bring your product up to date. The amendment 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 wording, "For Use By Pest Control Operators, Trained Military Personnel, And . . . Related Industries," should immediately follow the product name on the front panel.
2. Both Petroleum Distillate and Mineral Seal Oil should be placed under the subheading "Inert Ingredients," unless you have data which would support their pesticidal claim. If such data exist, please submit to this Agency. In addition, add an asterisk to the "Inert Ingredient" wording. Following this add another asterisk followed by the wording "\*Contains petroleum distillates."
3. Delete the wording "First Aid" and replace with, "Statement of Practical Treatment."
4. Please revise or add the following sections under the Statement of Practical Treatment section. We suggest the following

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statements; however, if your toxicological data suggest otherwise, please submit another draft Statement of Practical Treatment for prior approval.

If swallowed: Call a physician or Poison Control Center immediately. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

Note to Physician: Solvent presents aspiration hazard. Gastric lavage may be indicated if material was taken internally.

5. "Directions" should be revised to read "Directions For Use."
6. There is a conflict in directions. In one part of the text you stated "either inside or outside." Yet in the Directions For Use is the wording, "for outdoor use." Please correct this contradiction. We believe this product is for outdoor use only.
7. Immediately following the heading "Directions For Use" add the misuse statement, "It is a violation of Federal law to use this product in a manner inconsistent with its labeling."
8. The paragraphs, "Avoid excessive wetting . . ."; "This formulation may stain or otherwise . . ."; and "Never leave the thermal fogging machine unattended . . ." should all be added as part of the Directions For Use section.
9. The "Environmental Hazards" section should immediately follow your first paragraph of the Precautionary Statements section.
10. Please expand on the sentence "Wear protective clothing" with the following wording:

Protective clothing means, at least, a hat or other suitable head covering, a long-sleeved shirt and long legged trousers or a coverall type garment (all of closely woven fabric covering the body, including the arms and legs), shoes and socks.

11. Revise the Precautionary Statement sentence to read:

Wear a pesticide respirator jointly approved by the Mine Safety and Health Administration and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11.

12. The wording "HAZARDS TO HUMANS" should be on the same line with, "AND DOMESTIC ANIMALS."
13. Delete the heading, "Fire Hazards." It has been replaced with "Physical or Chemical Hazards."
14. Revise the Pesticide Disposal to read, "Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility." In addition, revise the following wording of the Container Disposal section to read, "Plastic Containers - ". . . for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by Federal, State, and local authorities by burning. If burned stay out of smoke."

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

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

Sincerely yours,

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

Enclosure

EXCELCIDE FORMULA #22

PRECAUCION!

AL USUARIO: Si usted no lee inglés, no use este producto hasta la etiqueta le haya sido explicada ampliamente.

TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.

ACTIVE INGREDIENTS

Petroleum Distillate	92.96%
Mineral Seal Oil	4.89%
Technical Piperonyl Butoxide*	1.00%
Fenthion (0,0-Dimethyl 0-(4-(methylthio)-m-tolyl) phosphorothioate)**	1.00%
Pyrethrins	.15%

\*Equivalent to .80% (butylcarbityl) (6-propyl-piperonyl) ether and .20% related compounds.

\*\*Baytex is a Reg. TM of the German trademark proprietor, Leverkusen, U.S. Patent No. 3,042,703

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

KEEP OUT OF REACH OF CHILDREN  
CAUTION

FIRST AID

IF SWALLOWED: Call a physician immediately. DO NOT INDUCE VOMITING.

IF INHALED: Remove person to fresh air. Apply artificial respiration if breathing has stopped. Adrenaline should never be given. Call a physician immediately.

IF ON SKIN OR CLOTHING: Remove all contaminated clothing and wash affected areas with soap and water. In serious cases, get medical attention.

IF IN EYES: Flush eyes with plenty of water. Call a physician immediately.

(See side panel for additional precautions).

2270-225

FOR OUTDOOR INDUSTRIAL USE AT WAREHOUSES, RAILROAD CARS, STATIONARY TRUCKS, FOOD PROCESSING PLANTS AND RESTAURANTS, FLOUR MILLS, GRAIN MILLS, RICE MILLS, BAKERIES, BEVERAGE, SNACK FOOD, CANNING, PACKING PLANTS, PACKAGING PLANTS, MILITARY INSTALLATIONS, AND SIMILAR INDUSTRIAL SITES, PHARMACEUTICAL AND DRUG FACILITIES.

FOR APPLICATION ONLY WITH INDUSTRIAL-TYPE, GASOLINE OPERATED DYNA-FOG THERMAL FOGGING EQUIPMENT.

FOR USE BY PEST CONTROL OPERATORS, TRAINED MILITARY PERSONNEL, AND TRAINED EMPLOYEES OF FOOD PROCESSING PLANTS AND RELATED INDUSTRIES. A READY-TO-USE CONTACT INSECTICIDE FOR THE CONTROL OF CERTAIN FLYING INSECTS AND EXPOSED CRAWLING INSECTS.

For control of flying insects either inside or outside--Drosophila Gnats (Vinegar and Fruit Flies), Houseflies, Blowflies, Angoumois Grain Moths, Mediterranean Flour Moths, Indian Meal Moths, mosquitoes, gnats, bees, wasps, hornets, and Cigarette beetles and for control of such crawling insects as--Cockroaches, Confused Flour Beetles, Ants, Caddisflies, Silverfish, Carpet Beetles, Waterbugs, Silverfish, Firebrats, Booklice, Millipedes, Centipedes, Sowbugs, Crickets, Spider Beetles, Meal Worms, Saw-Toothed Grain Beetles, Spiders, Dermestids, Granary Weevil and Rice Weevil.

#### DIRECTIONS

This product is ready-to-use, needs no dilution, and is intended for outdoor use. For outdoor fogging, the area to be treated should be completely covered with visible fog. This would be at the rate of approximately one gallon per acre. Plan fogging operation so that operator may continually move away from fog. Fogging should be done from windward side when applying fog. Fog the immediate outside perimeter of the building, and the outside surfaces of building, screen doors, window frames, around outdoor light fixtures, and around dock areas.

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS  
& DOMESTIC ANIMALS

CAUTION

May be harmful if swallowed, inhaled or absorbed through the skin. Do not breathe vapors or mist. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling. Wash all contaminated clothing with soap and hot water. Wear protective clothing. Wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration and by the National Institute for Occupational Safety and Health. Keep unprotected persons out of application areas. Do not allow insecticide or vapors to drift into areas not being treated. Do not contaminate water, food or feed. Keep out of reach of children and domestic animals. Do not use on humans, pets or livestock. Do not allow the product to contact plants or food crops. Do not mix or combine with other pesticides or chemicals. This product is not for household use. Do not apply directly to food. Remove pet food and water during application and for one hour after application.

PHYSICAL OR CHEMICAL HAZARDS

Avoid excessive wetting of asphalt tile, rubber and plastic materials. Do not use in areas where children or pests can come into direct contact with treated surface.

This formulation may stain or otherwise harm certain construction materials, fabrics, or other materials. First apply to a small inconspicuous area of such materials. If harm results, use should immediately be discontinued in these areas.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Keep out of any body of water. Do not contaminate water, by cleaning of equipment, or disposal of wastes. Apply this product only as specified on this label.

FIRE HAZARDS

All thermal fogging formulations can burn. This product is combustible.

Do not use, pour, spill or store near heat, electrical sparks or arcing, welding, strong oxidizers, or open flame. Extinguish pilot lights and all sources of ignition before use. Do not direct fog at any combustible material and maintain a distance of at least 10 feet between the equipment nozzle and any combustible surface.

Never leave the thermal fogging machine unattended while in operation. Do not wedge or tie the "on-off" lever in the "on" position. Follow all operation, maintenance, storage and safety instructions and precautions of the thermal fogging equipment manufacturer.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Strictly follow all safety precautions and directions for use on this labeling.

STORAGE AND DISPOSAL

STORAGE: Store in a secure area separated from water, food or feed. Keep container tightly closed when not in use. Store away from heat, strong oxidizers or open flame.

PESTICIDE DISPOSAL: Pesticide, spray mixture, or rinseate that is not used according to label instructions must be disposed of according to approved federal, state and local procedures.

CONTAINER DISPOSAL: Metal Containers--Triple rinse (or equivalent). Then offer for reconditioning or recycling, or puncture and dispose of in a sanitary landfill, or by other approved federal, state and local procedures. Plastic Containers--Triple rinse (or equivalent). Then offer for reconditioning or recycling, or dispose of in a sanitary landfill, or by professional incineration if allowed by federal, state and local authorities.

NOTICE

The manufacturer and seller warrant that this product conforms to its chemical description and is reasonably fit for the purpose stated on the labeling when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, express or implied extends to the use of this product contrary to label instructions, or under abnormal conditions not reasonably foreseeable to seller, and buyer assumes all risk of use, storage or handling of this product not in strict accordance with directions on this labeling.

NET CONTENTS \_\_\_\_\_ GALLONS

\*DYNA-FOG is a trademark of Curtis Dyna-Products Corp., Westfield, IN

EPA REG. NO. 2270-225  
EPA EST. NO. 2270-NO-01

THE HUGG' COMPANY, INC.

SANITATION IN THE FOOD AND ALLIED INDUSTRIES

FORMULATORS OF EXCELICIDE INSECTICIDES AND SUPPLIERS OF PEST CONTROL TOOLS

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