

AUG 29 1990

305-263407
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Mr. H. Wayne Moran
ConAgra Pet Products
1405 Cummings Drive
Richmond, VA 23261-6609

Dear Mr. Moran:

Subject: Amendment - Label Revision/Confidential Statement of
Formula
Sergeant's Indoor Fogger
EPA Registration No. 2517-48 (Formerly 778-70)
Your Application and Letter Dated February 27, 1989 and
April 15, 1990, respectively

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

1. As indicated in comment 1 in our letter dated April 9, 1990, under the subheading "Purpose", delete the word "unique" because it provides a misleading comparison to other fogger devices. Please make those changes.
2. Under the subheading "Purpose", the phrase "kill fleas, hatching eggs, larvae, ticks..." is misleading in that it implies control of hatching eggs and larvae of all listed pest when in fact there are only data to support kill of the adult stages of these pests. Therefore, for clarity revise the statement as follows: "kills fleas (including larvae and hatching eggs), ticks..."
3. Delete the claim "Keeps killing for two weeks" from the label because the data submitted does not support this residual claim. This claim is inconsistent with the claim "refog every 2 week or as needed" which appears on other product with the same percentages of active ingredients.
4. Please clarify the product's pH. The Confidential Statement of Formula states N/A whereas the data submitted indicates a pH of 4.1.
5. Please provide the flash point of the product with the propellant or add under the heading "Physical or Chemical Hazards" **Extremely Flammable** to the beginning of the statement.

66A

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 (H7505C)

Enclosure

ACCEPTED
COMMENTS
A Letter Dated:

6 29 1990

Federal Insecticide,
and Rodenticide Act as
for the pesticide
under EPA Reg. No.
2517-48



Sergeant's INDOOR FOGGER

Kills Fleas, ticks, lice, ants,
spiders, wasps and roaches.

**KILLS HATCHING EGGS, LARVAE
KEEPS KILLING FOR TWO WEEKS**

ACTIVE INGREDIENTS:	
4-broms Allethrin	0.300%
Related compounds	0.023%
Lynax (3-(piperonyl)ethyl methyl 4-chloro alpha-(1-methyl-ethyl) benzoacetate)	0.200%
INERT INGREDIENTS:	99.477%
*(Contains petroleum distillates)	100.00%

Formed under U.S. Patent No. 4,082,968
© Sulzinger Chemical Company

Sergeant's INDOOR FOGGER

IMPORTANT CONSUMER INFORMATION

PURPOSE: Sergeant's® Indoor Fogger kills fleas, hatching eggs, larvae, ticks, lice, houseflies, spiders, mosquitoes, wasps, small flying moths, ants, scorpions, fruit flies, gnats, crickets, centipedes, black carpet beetles, silverfish, and roaches. One can treats up to 5,000 cubic feet. Sergeant's can be used in every room in the house: Kitchen, Family Room, Bedroom, Living Room, Garage, Basement and Attic. Also useful in Campers, Boats, and pet sleeping areas, where an insect problem exists. This unique Sergeant's product allows you to automatically fill a whole room with insect killing fog while you are away.

DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling.

For use only when building is vacated by humans and pets. Use at least one can per 5,000 cubic feet of unobstructed area (20' x 25' x 10'). Use additional units for remote rooms or when free flow of wind is not assured. All food preparation surfaces and utensils should be covered and thoroughly washed after treatment. REMOVE pets, birds and cover or remove fish tanks. Do not contaminate feed, water or food shells. Food should be removed or covered during treatment. Open cupboards, closets, trunks and interior doors in areas to be treated. COVER asphalt tile, waxed wood floors, waxed furniture and plastic items, such as stereo covers, eyeglasses and motion boxes, which may come in contact with the fog (newspapers may be used). CLOSE outside doors and windows. Shut off fans and air conditioners. EXTINGUISH ALL flames and pilot lights. ACTIVATE FOGGER while pointing top of can away from face by pressing down firmly with thumb on spray tab, hooking the catch. Place fogger on stand covered with newspapers in center of room and leave house at once. DO NOT REENTER BUILDING FOR FOUR HOURS, then open doors and windows and allow to air for 30 minutes. Refog every two weeks if needed.

STORAGE AND DISPOSAL: Store only in cool, dry place inaccessible to children and pets. Do not reuse empty container. Replace cap, securely wrap in newspaper and discard in trash. Do not incinerate or puncture.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Irritant if swallowed. Avoid breathing of mist and contact with eyes, skin, or clothing. Wash contaminated skin promptly with soap and warm water. For eyes, flush with plenty of water. Get medical attention if irritation persists.

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Call a physician or Poison Control Center immediately. DO NOT INDUCE VOMITING. Solvent presents aspiration hazard. Gastric lavage may be indicated if material taken internally.

If inhaled: Remove victim to fresh air. Apply artificial respiration if indicated. If on skin: Remove contaminated clothing and wash affected areas with soap and water. In the eyes: Flush with plenty of water. Call a physician if irritation persists.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate. Exposure to temperatures above 130°F may cause bursting.

EPA Reg. No. 778-70

EPA Est. No. 11715-10-1

