

2724-675

06-15-2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 15, 2011

Mr. James J. McFadden, Ph.D.
Senior Regulatory Project Manager
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173-5417

**Subject: Amended Labeling; Response to SAL Dated May 5, 2011
Premium Roach Spray, EPA Reg. No. 2724-675
Your Submission Dated May 26, 2010**

Dear Mr. McFadden

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following label revision provision(s):

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s), top of page 2 of 5:

1. Insert the following text immediately preceding the existing 1st sentence within this subsection: "Harmful if swallowed."

Precautionary Statements, First Aid subsection comment(s), middle of page 2 of 5:

2. Revise the 2nd sentence of the **HOT LINE NUMBER** statement to read "For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx, twenty-four (24) hours per day, seven (7) days per week."

Directions for Use, USE RESTRICTIONS subsection comment(s), bottom of page 3 of 5:

3. Within the 9th bulleted statement, capitalize the letter "o" at the beginning of the 2nd sentence.

Storage and Disposal Statement section comment(s), page 5 of 5:

4. Revise the "**DISPOSAL:**" subsection heading to read "**CONTAINER DISPOSAL:**"

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely Yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure:
002724-00675 D449973

Copy of label stamped "Accepted with Comments"

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PREMIUM ROACH SPRAY

For use in homes, apartment buildings, and the non-food/feed areas of hotels, stores, warehouses, office buildings, schools, nursing homes, hospitals, industrial buildings, vessels, rail cars, trucks, trailers, and aircraft (do not use in aircraft cabins)

Contains Synergized Etofenprox, Pyrethrin and Tetramethrin

Provides Quick Killing Action

Economical Do-It-Yourself Pest Control

Use Indoors and Outdoors

Flushes Roaches from Where They Hide

Kills Fleas - Roaches - Ants

Kills Bed Bugs

Kills on Contact - Kills Fast

Kills Hidden Bugs

A broad spectrum insecticide highly effective against Ants, Carpet Beetles, Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Flour Beetles, Grain Beetles, Pillbugs, Silverfish, Sowbugs, and Spiders

No Oily Residue - Low Odor

ACTIVE INGREDIENTS:

Pyrethrins (CAS #8003-34-7)..... 0.15%

Tetramethrin (CAS #7696-12-0)..... 0.50%

Etofenprox (CAS #80844-07-1)..... 1.00%

Piperonyl Butoxide, Technical* (CAS #51-03-6)..... 1.50%

OTHER INGREDIENTS:..... 96.85%

Total 100.00%

*Equivalent to 1.2% (butylcarbityl)(6-propylpiperonyl) ether and 0.3% related compounds

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel For Additional Precautions

NET CONTENTS: _____ ounces

EPA REG. NO. 2724-675

EPA EST. NO.

ACCEPTED
With COMMENTS
In EPA Letter Dated:
June 15, 2011
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
2724-675

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

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear

- Long-sleeve shirt,
- Long pants,
- Shoes and socks

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
Note to Physician: Vomiting may cause aspiration pneumonia.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product, (including health concerns, medical emergencies or pesticide incidents), you may also call 1-800-xxx-xxxx.	

ENVIRONMENTAL HAZARDS

This product is extremely toxic to aquatic organisms, including fish and aquatic invertebrates. Do not contaminate water when disposing of equipment, wash-water, or rinsate. See Directions for Use for additional precautions and requirements.

PHYSICAL OR CHEMICAL HAZARDS

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THE ENTIRE LABEL PRIOR TO USE. USE STRICTLY IN ACCORDANCE WITH ALL USE RESTRICTIONS AND DIRECTIONS.

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USE RESTRICTIONS

Do not contaminate food or feedstuffs.
Not for use in food or feed areas of food handling and processing facilities.
Do not use in aircraft cabins.
Do not apply to classrooms when in use.
Do not apply to patient rooms in hospitals and nursing homes while occupied
Do not use this product directly on domestic (companion) animals (dogs, cats, puppies or kittens).
Do not enter or allow others to enter until sprays have dispersed, and the area has been thoroughly ventilated. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
Do not apply when food is present. Do not use in food areas of food handling establishments, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held. In the home, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food.
When used as a residential general outdoor surface spray: All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses: (1) Treatment to soil or vegetation around structures; and (2) Applications to building foundations, up to a maximum height of 3 feet. other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.
Do not apply this product directly to sewers or drains, or to any area like a gutter where drainage to storm sewers, water bodies, or aquatic habitat can occur, except as directed by this label.
Remove pets, birds and cover fish aquariums before spraying.
To apply at the maximum application rate, spray for 24 seconds to cover an area of 5' X 10' (50 sq ft).

USE INFORMATION: Premium Roach Spray provides effective kill of listed pests in and on buildings, structures and their immediate surroundings and on modes of transport. Permitted areas of use: (apartment buildings, homes, hospitals, and the non-food/feed areas of hotels, industrial buildings, laboratories, mausoleums, motels, nursing homes, private residences, schools, stores, utilities warehouses, and in non-food areas of [restaurants, food manufacturing, processing, and servicing establishments], and on: vessels, rail cars, aircraft (do not use in aircraft cabins), buses, trucks and trailers).

INDOORS

Hold container upright with nozzle away from you. Press valve down and spray surface until slightly wet (at a rate of 2 seconds to treat approximately 1 linear foot of baseboard area).

To kill Cockroaches, Ants, Crickets, Earwigs, Firebrats, Fleas, Silverfish, Spiders, and Sowbugs: Apply as a crack and crevice or spot treatment to areas where these pests crawl and hide, especially on hidden surfaces around sinks and storage areas, along and behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, and on the underside of shelves, drawers and bookcases. **Do not reapply more often than every 14 days.**

Ants: Spray around ant trails, doors and windows and other places where ants enter premises. Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris.

Fleas in Buildings: Remove and destroy pet's old bedding and replace with clean fresh bedding after treatment of pet areas. Apply as a crack and crevice treatment to infested areas such as pet beds, sleeping quarters of pets, around base boards, windows and door frames, local areas of floors (under the edges of rugs and floor coverings), and between/under cushions of upholstered furniture. As a broadcast application for fleas, spray at the maximum rate of 24 seconds to cover an area of 5' X 10' (50 sq ft). Do not allow pets to reoccupy treated areas until treated surfaces have thoroughly dried. **DO NOT USE THIS PRODUCT DIRECTLY ON DOMESTIC/COMPANION ANIMALS (DOGS, CATS, PUPPIES OR KITTENS).** Treat dogs and cats with a flea and tick control product before allowing them to reenter the treated area.

Spiders: Apply as a crack and crevice or spot treatment along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

Earwigs, Mole Crickets, Pillbugs, and Sowbugs: Apply as a crack and crevice or spot treatment around doors and windows, along and behind baseboards, and in storage areas where these pests are found.

Pantry Pests - Exposed Stages of Sawtoothed Grain Beetles, Flour Beetles (Red and Confused), and Cigarette Beetles: Treat exposed stages. Remove all foodstuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow spray to dry prior to replacement of shelf paper, food and utensils.

Carpet Beetles (Black, Furniture and Varied): Apply as a crack and crevice or spot treatment on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Bed Bugs – Thoroughly inspect area of suspected bed bug infestation and note potential harborage sites or actual infestations. Remove and/or pick up clothing and other obstacles that may prevent thorough inspection or treatment. Remove and sanitize infested bedding (pillows and linens), clothing or other items.

Apply [brand name] on mattresses as a spot treatment to mattress seams, edges, and tufts of bed only. Do not use [brand name] directly on mattresses, pillows, bed linens or clothes. Do not saturate the mattress; and do not treat entire surface area of mattress. Allow mattress to dry thoroughly before replacing pillows and/or bed linens.

Bed bugs may also harbor in areas of the room away from the bed. Apply [brand name] as a crack & crevice or spot application where evidence of bed bugs occurs. This includes bed frames, box springs, inside empty drawers and clothes closets, night stands and other furniture in the room, carpet edges, high and low wall moldings (such as floor molding or window casings), wall voids, behind wall hangings and mirrors, wallpaper edges and popcorn ceilings. Remove all clothes and other articles from dressers or closets before application. Take bed apart. Treat joints and channels if hollow, such as square or round tubing, and see that interior frame-work is treated. Apply [brand name] as a surface application to carpeting, drapes, and flooring at the rate of 16 ounces per 500 ft². Allow all treated areas to dry thoroughly before use.

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[Brand name] is not recommended for use as sole protection against bed bugs. If evidence of bed bugs is found in/on mattresses, use products approved for this use.

OUTDOORS

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Spray with wind if breeze is blowing.

PESTS ON OUTSIDE SURFACES OF BUILDINGS: To kill Ants, Crickets, Earwigs, and Sowbugs (Pillbugs): Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. For ants, spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris. Apply as a spray to outside surfaces of buildings where listed insects tend to congregate. Spray areas include screens, window frames, eaves, porches, patios, garages and refuse dumps. Do not reapply more than every 7 days.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. (Include for occupational use only)
PESTICIDE STORAGE: Do not store near heat or open flame. Store in cool, dry (preferably locked) area that is inaccessible to children and animals. **DISPOSAL:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

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