

OCT 1 - 2007

Ms Nancy Huebl
WELLMARK International
1501 East Woodfield Road, Suite 200 West
Schaumburg, ILL 60173

Dear Ms. Huebl:

Subject: Label Revisions

EPA Registration Number: 2724-702

Product Name: ETOFENPROX IGR Home & Garden Spray II

Application date: August 13, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comment listed below.

1. At the next label printing revise the Hazards to Humans and Domestic to read:
CAUTION: Avoid contact with skin and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Repeated exposure to etofenprox can cause skin irritation.
2. The Net Contents must appear on the label and the EPA Establishment No. must appear on the label or container prior to marketing.
3. The company name and address must be on the pesticide label prior to Marketing of the product. The name and address must be that of the manufacturer, preceded by phrase "Manufactured by" If you are not the manufacturer (producer) the name must be qualified by the phrase "Manufacturer for" To indicate that the name shown is not the producer. The name and address must be displayed prominently and within the range of the type size that is required for all label text. The name and address may be placed anywhere on the label, but referred on the front panel.

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Enclosed is a copy of your stamped label "Accepted with Comments."
"Submit two (2) copies for the final label for the file."

To expedite handling, please return a copy of this letter with your corrected labels for the file.

To expedite handling, please return a copy of the letter with your corrected labels. If you have any questions regarding this letter contact Ms. Pat Quarles @ 703-305-6876.

Sincerely,

George LaRocca
Product Manager 13
Insecticide Branch
Registration Division 7505P

enclosure

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ETOFPENPROX IGR HOME & CARPET SPRAY II

Economical Do-It-Yourself Pest Control

Kills fleas, ticks, roaches, ants, spiders, crickets, waterbugs, silverfish, sowbugs, and carpet beetles

No Oily Residue - No Unpleasant Odor

For use indoors at Residential sites only

ACTIVE INGREDIENTS:

Etofenprox.....	0.50%
Etoc.....	0.30%
N-Octyl Bicycloheptene Dicarboximide.....	0.50%
Pyriproxyfen.....	0.02%
OTHER INGREDIENTS*:	<u>98.68%</u>
TOTAL	100.00%

* Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Additional Precautions

NET WT. _____ oz. (_____ gms.)

EPA Reg. No. 2724-702

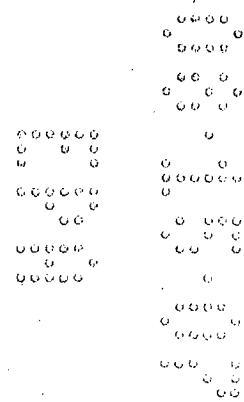
EPA Est. No.

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

OCT. 1 - 2007

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

2724-702



ETOFENPROX IGR II kills adult and pre-adult fleas. It contains an Insect Growth Regulator (IGR) along with other ingredients to kill the adult fleas and prevent pre-adult fleas from developing into biting adults. Reaches the hiding places of the flea: rugs, carpets, drapes, pet bedding, upholstery and furniture. Protects the household from a buildup of fleas and reinfestation. One treatment protects for 210 days. **ETOFENPROX IGR II** kills fleas, ticks, roaches, ants, waterbugs, silverfish, crickets, spiders, sowbugs, and carpet beetles.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Repeated exposure to Etofenprox can cause skin irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID	
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.	
NOTE TO PHYSICIAN: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.	

PHYSICAL AND 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. Use adequate ventilation during use. Do not smoke while using this product. Do not use this product in or on electrical equipment due to the possibility of shock hazard. Do not allow product to freeze.

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 LABEL PRECAUTIONS AND DIRECTIONS.

SHAKE WELL BEFORE USE

Do not allow children or pets to contact treated surfaces until spray has dried. Remove pets, birds, and cover fish aquariums before spraying. All food processing surfaces and utensils should be covered during treatment or wash thoroughly before reuse. Exposed food should be covered or removed.

Indoors: Thoroughly vacuum all carpeting, upholstered furniture, along baseboards, under furniture and in closets. Seal vacuum bag and dispose of in trash outdoors. Spray **ETOFENPROX IGR II** from 2 feet to 3 feet away from surface being treated. Apply with a smooth back-and-forth motion to carpets, drapes, rugs, drapes, and upholstered furniture. Avoid wetting or saturating of carpets or furniture. A fine mist spray that is evenly applied will do the job properly. Do not spray wood furniture, floors or trim as water spotting may occur. Repeat treatment as necessary to control fleas and ticks.

Apply directly to exposed insects - roaches, ants, spiders, crickets, waterbugs, silverfish, sowbugs, and carpet beetles: Spray areas where these pests are found or may hide, including dark corners of rooms and closets, cracks and crevices, along baseboards and door sills and frames, behind sinks, stoves, refrigerators, and cabinets and around garbage cans, plumbing and other utility installations. Pests driven out of hiding places should be sprayed directly. Spray ant trails, nests and points of entry. Repeat as necessary.

On Pet Bedding: Treat pet bedding and resting places. Apply a uniform application of ETOFENPROX IGR II to nearby cracks and crevices, along and behind baseboards, window and door sills, and localized areas of floors where fleas or ticks may be present as these are primary hiding places for fleas. Pet bedding does not need to be removed after treatment.

Indoor Kennels:

Remove pets before spraying.

Spray ETOFENPROX IGR II from 2 feet to 3 feet away from surface being treated. Apply with a smooth back-and-forth motion. A fine mist spray that is evenly applied will do the job properly. Repeat treatment as necessary to control fleas and ticks.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Do not store near heat or open flame. Store in cool dry area away from children.

CONTAINER 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.

For information, or in case of an emergency, call 1-800-xxx-xxxx or visit our Web site: [URL]

Wellmark International
Schaumburg, Illinois 60173
Made in USA

