UNITED STATES ENVIRONMENTAL PROTEC

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

John S. Thornton, Director Product Registrations and Regulatory Affairs **Bayer** Corporation **Agriculture Division** 8400 Hawthorn Road P.O. Box 4913 Kansas City, MO 64120-0013

Subject: Amendment -Label Change/Alternate Brand Name Laser Ant & Roach Killer Pump Spray II EPA Registration No. 3125-530 Your submissions dated August 27, 1999 and October 22, 1999

Dear Mr. Thornton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. A stamped copy of the labeling is enclosed for your records. Submit two copies of finished labeling before you release the product for shipment.

Reinstate the statement "For Indoor/Outdoor Residential Use Only" to a position above 1. the "Keep Out of Reach of Children" statement".

2. Words or phrases implying that a product possesses unique characteristics because of its composition are not acceptable. The alternate brand name, Bayer ADVANCED HOME Home Pest Control Indoor & Outdoor Insect Killer Ready-to-Use, must be modified by deleting the phrase "ADVANCED HOME" from the product name. As stated in your letter of April 23, 1999, the formulation of this product is substantially similar to that of TEMPO Concentrate, EPA Reg. No. 3125-502 and there has been no change to the CSF of the cited product since the previously approved label. Further, since there has been no change in the product formulation (CSF) since the initial registration, the phrase "ADVANCED HOME" is considered false and misleading and, as such, is not considered acceptable either as part of the product name or as a separate marketing claim. We note that our letter of July 28, 1999 regarding the unconditional registration of this product required that the phrase "ADVANCED DOUBLE PROTECTION FORMULA" be deleted from the front panel of the proposed label. This statement is a comparative SYMBOL 7057 advertising claim relative to effectiveness and may be false or misleading in comparison SIRNAME with other products that don't include such a statement on their labels. According to 40 <u>CFR 156.10(a)(5)</u>, no advertising claims may be false or misleading in any way. In

EPA Form 1320-1A (addition, claims that are exaggerated or unsubstantiated can not be made on the landial FILE COPY

3. Add the phrase "vapors or " to the statement "Avoid breathing spray mist" under the Precautionary Statements section. This was brought to your attention in our previous letter.

Since the labeling submitted with your October 22, 1999 letter is substantially similar to that approved on July 28, 1999, is in finished format and the above requested revisions do not raise risk concerns associated with the use of this product, we will allow you to use this labeling for a period not to exceed January 31, 2000. Products released for shipment after January 31, 2000 must bear labeling revised in accordance with this letter.

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,

George T. LaRocca Product Manager 13 Insecticide Branch Registration Division (7505C)

Enclosure

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Bayer

Bayer 💮 DIRECTIONS FOR USE (cont'd) IMPORTANT-Directions for Storage and Disposal ADVANCED HOME OUTDOOR USE STORACE Store in an area out of reach of children, preferably CONDITIONS a locked storage cabinet. Protect from freezing. Apply to exterior surfaces of the home. Apply to extrict surfaces of the home.
 Spray a band 3 to 4 feet wide around and alongside the foundation and parches of the house.
 Trest soil, turf or wallways adjacent to foundation and parches.
 Also text 1 to 2 feet up along the side of the dwelling.
 For more serious problems, a wider band of treatment, up to 10 feet. · Do not reuse empty container DISPOSAL Wap empty container in newspaper or place in paper or plastic bag (such as a grocery bag).
 Dispose in trash. **Home Pest Control** TT Indoor & Outdoor Insect Kill For more serious problems, a wider band of treatmerit, up to 10 feet, may be necessar;
 Spray with the wind to avoid drilling of the spray onto skin or clothing.
 Weat where dissimilar building materials meet, such as where brick meets wood tim or where solving meets window edges or where cracks are visible or around and into any openings where utilities enter the home. Synay around doors and window tranes.
 Teat outs're surfaces or garages, carports, patios, driveways and sidewalls if insects are present.
 Teat outs're mothem areas such as around wood piles, storage sheds and their areas of insect infestation as needed. Spray on ant trails and an bills. READY-TO-USE Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow all state and local guidelines. Never pour any insecticide down the drain Bayer Advanced Home Pest Control provides up to 4 months of insect protection with a single application. Keeping your home free of nuisance pests has never been easier. or storm sewer PRECAUTIONARY STATEMENTS **Hazards to Humans and Domestic Animals READ THE LABEL FIRST!** · Harmful if swallowed or inhaled. and other areas of insect infestation as needed. Spray on ani trails a an halk. • for waps, homes, yellow jackes: Application to nests should be made late in the evening when insects are at rest. • b aid in control of fire antis in lawns and other outdoor home recreation areas, thoroughly detech the entire mound area. Spray provides contact activity and residual in the active mound. Use a coarse spray and apply gently to avoid disturbing asts. Note: for best results apply in cool weather 65 to 80° F, or in early morning or late evening hours. Treat new mounds as they appear. Harmut II swalewere or immers.
 Causes eye imitation.
 Avoid contact with skin, eyes, or clothing.
 Avoid breathing spay mist.
 Wish throughly with scap and water after handling.
 Remove contaminated clothing and wash clothing QUICK FACTS CAUTION Kills Ants and Roaches in Seconds Continues Killing Up to 4 Months Indoors
 Keeps Listed Insects Out Of Your Home before reuse Non-staining FIRST AID + Ants, Cockroaches, Fleas, Soiders and KILLS IN THE CASE OF WOOD INFESTING PESTS other listed pests IMMEDIATELY ... ACCIDENTAL_ For control of termites and wood-infesting beetles found above ground, apply to voids and holes in damaged wood, and in spaces between wooden structures and between the sill plate and ioundation if the person is able to swallow: • Have them sip 1 to 2 glasses of water Indoor as spot or crack and crevice spray. WHERE TO USE Outdoor as perimeter treatment. SWALLOWING Call a doctor or poison control center for further treatment advice. between wooden structures and between the sull paide and isonitation where wood is exposed. • Apply spary to exposed worker and winged reproductive forms of termises. This type of application is intended to be a supplemental preatment for control of dywood and above ground subterranean termises and other wood-infesting intencts. It is not intended as a substruct for soil treatments for termite control. • for control of aswarning or reproductive stages of termites, apply a coarse spars to the swarm or area on which they collect. • for control of carpetter ants around houses and other subcitures or subter these remains. Spray into cracks and crences or wolds where these ants or their nests are present. Use a sufficient amount of coarse spary to cover the area. • for control of carpetter bees in structures, spray the liquid directly into be entrance holes. Lawe the entrance holes open for 24 hours to be certain choles. Taway to cover the sets. One of 24 hours to be certain choles. Taway to cover the area. here wood is exposed. RE-ENTRY Re-enter when spray is dry · Hold eye open and rinse slowly and gently with For questions or comments, call toll-free 1-877-BayerAH CONTACT water.
 Continue to rinse eye for 10 to 15 minutes.
 Call a doctor if irritation persists. Т 🗖 WITH EYES www.AdvancedHomeCare.com f breathing is affected, move person to fresh air.
 Contact doctor or poison control center for further *Common chemical name for Cylathrin® **Other ingredients include; Aurified water, organic solvent (less than 0.3%, to dissolve the active ingredient for mixing) and surfactants (to keep the INGREDIENTS INHALATION] Insament advice.
 If not breathing, call an ambulance and give artificial respiration. ACTIVE INGREDIENT: Cyfluthin*_____ 0.1% 99.9% NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. active ingredient dispersed in active ingredient of spersed in water). EPA Reg. No. 3125-530 EPA Reg. No. indicated by 2nd and 3rd digits of the batch number on this package. (65) \approx 10370-TX-1 (92) = 34704-MS-2 (39) = 58996-MQ-1 For medical energency information, you may call toll-free 1-877-229-3763. Active ingredient: Cylluthin ICAS # 68359-37-5) PESTS CONTROLLED ENVIRONMENTAL HAZARDS DIRECTIONS FOR USE It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results read and follow all label directions. This pesticide is highly toxic to aquatic invertebrates and lish. Do not apply directly to water. INDOOR PESTS Influctorum resus I. Crawling Peaks Ants leacept Pharaohi, Bedbugs, Carpet Beetles, Centipedes, Cockrasches, Circkets, Earwigs, Firebrats, Millipedes, Pillbugs, Silverlish, Sowbugs, Spolers 2. Rying Peaks Clothes Moths, Flies, Gnats, Midges, Mosquitoes, Moths, Wasps, Yellow Do not contaminate water when cleaning equipment or disposing of equip Do not containing wates when coming explanets of uses ment waters are acted.
 This product is not intended for application to plants or lawns.
 Apply this product only as specified on this label. Indoors, do not use as a space spray (do not spray) REFORE into the aid Bo not spray into fish pools, ponds, streams, or fakes.
 Remove animal feeding dishes before spraying.
 Keep children and pets away from treated areas until YOU USE NOTICE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Home Peg Control under expected con-ditions. The Buyer assumes responsibility for lack of performance or safety if not used according to directions. Cottes Mottes, Hies, Unata, Mages, mesquineus meuros meres Jackets 3. Party & Stored Product Pests BEFLTS (second daults & immane stages): Cadelle, Cigarette, Contauel Hour, Dermeslai, Drug-store, Conary Weevil, Hide, Larder, Leartier, Lesser Grain Borer, Lesser Mealworm, Merchant Grain, Mealworm, Ref Flour, Rice Weevil, Sawtoother Grain, Warehouse MOTHS: Indian Meal, Medierranean Flour Read and spray has dried. • Do not use on surfaces where food is prepared or follow these Money Back Guarantee: If you are not satisfied with this product, we will Before spraying indoors, remove birds from area and tightly cover or remove fish bowls and aquariums. directions gladly refund your original purchase price. when using: Distributed by: HOW TO LISE WOOD INFESTING PESTS Ravey Comprision BEFTLES: Ambrosia, Deathwatch, False Powderpost, Old House Borer, INDOOR USE Garden & Professional Care Interface to be treated.
• Hold container upright while spraying. Direct nozzle about 12 inches from waface to be treated.
• Spray around baseboards, into cracks and crevices and other places where insects live and hiele lunder sinks, cathenes, refrequencies, damp areas, dc.) until surfaces are wet. Avoid excessive worting of linoleum, asphalt takes or plastic. Spray directly on insects if possible.
• For long taxing residual action leave spray undisturbed. The product will keep on killing for up to 4 months. Powderpost, Carpenter Ants, Carpenter Bees TERMITES: Subterranean, Formosan, Drywood Box 4913 Kansas City, MO 64120-0013 OUTDOOR/PERIMETER PESTS Condicional Failure (1971) Ans, Bees, Bouelder Bugs, Carpenter A.u.s, Cricitties, Centipedes, Clusernies, Cockroaches, Crickets, Elm Leaf Beetle, Fire Ans, Firebras, Files, Ties, Cinas, Ground Beetles, Honnes, Imponed Red Tie Ans, Midges, Millipeet, Mosquines, Moths, Scophis, Salverfah, Spiders, Ticks lincluding Deer Ticks), Wasps, Yellow Jackets Made in USA 41 073 "027 2 Bayer and H are registered trademarks of Bayer AG 919909 8.0

6.5" w x 6.519" h, .125 " cr AJ619/1gal L&G/bk&frt template 4-12-99 mr

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(FOR TOTE)

raft Dated: 04/12/9

Laser Ant & Roach Killer Pump Spray II Contains Cylathrin

Ready-to-Use Kills fast, lasts long.

Kills most common household insect pests.

For Indoor and Outdoor Use

Kills invading insect around basements, foundations and baseboards

Kills the insects you see, kills the ones you don't see Kills hidden bugs.

Kills ants and roaches in second

Just one application quickly kills insects - Continues killing up to 4 months indoors (144, 55) Double Protection: Fast Acting ... Kills on Contact - - Long Lasting ... Keeps on Killing for up to 4 months Fast Acting - - Long Lasting Also kills with residual action.

Double Protection - - Use Inside and Outside

Use as outdoor barrier treatment - - keeps insects from entering your home.

Kills a Wide Range of Crawling, Flying and Wood-Infesting Pests

4 Month Insect Control Indoors Water-based formula

Non-Staining **Guaranteed Satisfaction**

Kills most common pests, including ants and cockroaches Up to 16 weeks of cockroach control

Net Contents: 24 fl oz or 1 gallon EPA Reg. No. 3125-530

No. 1998 AND AND A DECEMBER OF A DECEMBER STOP - Read This Entire Label Before Use KEEP OUT OF REACH OF CHILDREN

FOR INDOOR/OUTDOOR RESIDENTIAL USE ONL

CAUTION

Harmful if swallowe eye imitati

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EPA Est. No. XXXX-AA-

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		Systol (u. eraci vant (erevice) si As frenimater (reatment) ar f		
		nen spravis dry EPA Est. No: XXXX-AA-1 . Ict label before use:		Bayer Corporation
andre en	Information: TollFree 1-	877-229-3724	Garden & Box 4913, Kansas City	Professional Care , MO 64120-0013
Ingredients	ACTIVE INGREDIENT:	referent of the second		
	Common chemical r	name for Cylathrin@ Clude: Purified water, organic mixing) and surfactants (to ke	solvent (less than 0.3%	to dissolve the dispersed in
PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals	 Avoid breathing vapor 	in, eyes, or clothing. In soap and water after handling		
First Aid	IN THE CASE OF ACCIDENTAL	IMI	MEDIATELY	
	Swallowing	If the person is able to swallow: Have them sip 1 to 2 glassfu Call a doctor or poison contri	is of water	ent advice
	Contact with eyes	Hold eye open and rinse slow Continue to rinse eye for 10 Call a doctor if irritation persi	to 15 minutes.	
4. Alexander de Maria	ii Inhalation	If breathing is affected, move Contact doctor or poison con If not breathing, call an ambu	trol center for further treat	
	Comparing the second se	on control center, have this product of doctor's office, bring this product I 3-3763 for medical emergency in 7-5]	abel to show medical perso formation 2 Active, Ingr	nnel: You may call
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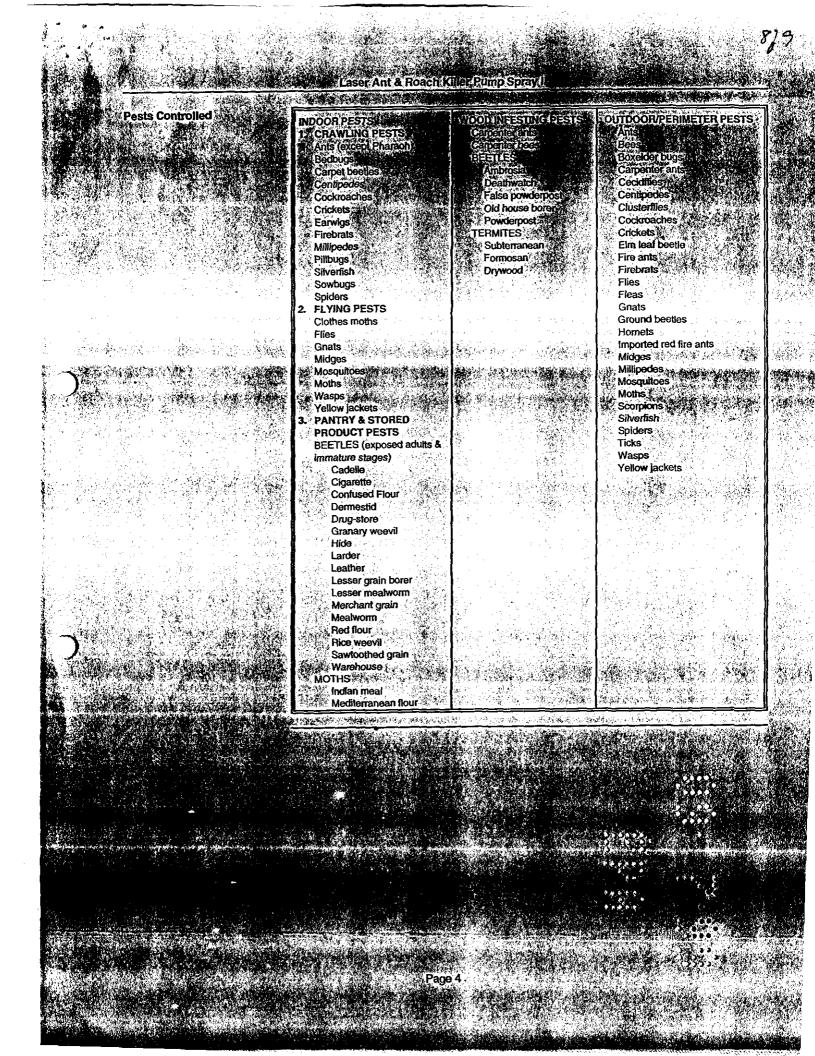
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A. Stanian .	A Laser Ant & Roach Kille, gump Spray II and a state of the second
Before You Use	Read and follow these directions where Snot • Indoors, do not use as a species for (do not spraving to already • Do not spray into fish pools form a rearns of lakes • Remove animal feeding distes to fore spraving • Keep children and pets away from feated areas until spravinas dried to • Do not use on surfaces, where codels prepared or where food is exposed. • Before spraving indoors, remove birds from area and lightly cover or remove fish bowls and aquariums.
How to Use	 Indoor Use Hold container upright while spraying. Direct nozzle about 12 inches from surface to be treated. Spray around baseboards, into cracks and crevices and other places where insects live and hide (under sinks, cabinets, refrigerators, damp areas, etc.) until surfaces are wet. Avoid excessive wetting of linoleum, asphalt tiles or plastic. Spray directly on insects if possible. For long lasting residual action leave spray undisturbed. The product will keep on killing for up to 4 months.
	 Outdoor Use Apply to exterior surfaces of the home. Spray a band 3 to 4 feet wide around and alongside the foundation and porches of the house. Treat soil, turf or walkways adjacent to foundation and porches. Also treat 1 to 2 feet up along the side of the dwelling. For more serious problems, a wider band of treatment, up to 10 feet, may be necessary. Spray with the wind to avoid drifting of the spray onto skin or clothing. Treat where dissimilar building materials meet, such as where brick meets wood trim or where siding meets window edges or where cracks are visible or around and into any openings where utilities enter the home. Spray around doors and window trames. Treat outside surfaces of garages, carports, patios, driveways and sidewalks if insects are
	 present. Treat other problem areas such as around wood piles, storage sheds and other areas of insect infestation as needed. Spray on ant trails and ant hills. For wasps, homets, yellow jackets: Application to nests should be made late in the evening when insects are at rest. To aid in control of fire ants in lawns and other outdoor home recreation areas, thoroughly drench the entire mound area. Spray provides contact activity and residual in the active mound. Use a coarse spray and apply gently to avoid disturbing ants. Note: For best results apply in cool weather 65 to 80 °F, or in early morning or late evening hours. Treat new mounds as they appear.
	 For control of termites and wood-infesting beetles found above ground, apply to voids and holes in damaged wood, and in spaces between wooden structures and between the sill plate and foundation where wood is exposed. Apply spray to exposed worker and winged reproductive forms of termites. This type of application is intended to be a supplemental treatment for control of drivood and above ground subterranean termites and other wood-infesting insects. It is not intended as a first substitute for soil treatments for termite control.
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Ant & Roach Killer Pump Spray, I

IMPORTANT: Directions for Storage and Disposal Storage Conditions Disposal

tan area outomeacreouchildren; preferably a locked storage cabinet. Protect from 多点主法理教室者动物

Do not reuse empty container and so when a second sec bag). Dispose in trash.

Important: It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow all state and local guidelines. Never pour any insecticide down the drain or storm sewer.

NOTICE

Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Laser Ant & Roach Killer Pump Spray II under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

Bayer Corporation Garden & Professional Care Box 4913, Kansas City, MO 64120-0013 1-877-229-3724



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