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Mr. I. Lynwood Kanin  
Lynwood Laboratories, Inc.  
945 Great Plain Avenue  
Needham, MA 02192

SEP 20 1991

Dear Mr. Kanin:

Subject: Revised labeling in response to  
Agency letter dated Nov. 20, 1985  
Shoofly Hornet Jet Bomb  
EPA Reg. No. 3546-27  
Your FAX submission received September 13, 1991

The labeling referred to above, submitted in connection with a registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable provided the following revisions are made at the next printing (based on our telephone conversation of September 19, 1991, the Agency understands that this next label printing will occur within 3 months):

- 1) The signal word CAUTION must appear on the front panel of the label, in horizontal alignment with the rest of the front panel text, not vertically to the side of the front panel.
- 2) The child hazard precaution, KEEP OUT OF REACH OF CHILDREN, must appear on the front panel, in horizontal alignment and must appear directly above (not to the side of) the signal word CAUTION.
- 3) On the right panel, the pests named under the pictures must be the same as those claimed in the specific directions for use and should reflect like locations for the pests named. Specifically, under the picture of the outside lamp, delete "night bugs" and "chiggers". In addition to "mosquitoes", appropriate pests for this site include flies, wasps, and flying moths. Chiggers are generally found in grass and underbrush. [Note: Do not include the parenthesis marks that appear around specified text in the Agency's letters.]

- 4) Revise the Hazards to Humans and Domestic Animals to read as follows:

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Do not smoke while applying this product. Wash thoroughly with soap and water after handling and before eating or smoking. May cause contact sensitization following repeated contact with skin. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. Remove contaminated clothing and wash before reuse. Avoid contamination of food or feed. Do not use on household pets or humans. Remove pets from area and remove or cover fish bowls before spraying. Do not allow children or pets in treated areas until sprayed surfaces have dried.

- 5) Appropriate first aid advice must appear on the label, under the heading Statement of Practical Treatment. This section may appear directly under the Hazards to Humans and Domestic Animals section, and should read as follows:

**Statement of Practical Treatment**

**If swallowed:** Call a physician or Poison Control Center immediately. DO NOT INDUCE VOMITING UNLESS NO OTHER TREATMENT IS AVAILABLE. Vomiting may cause aspiration pneumonia. If it is necessary to induce vomiting, give victim one or two glasses of water and insert finger in back of throat. Do not induce vomiting or give anything by mouth if person is unconscious or convulsing.

**IF INHALED:** Remove victim to fresh air and apply artificial respiration if indicated. Get medical attention.

**IF IN EYES:** Rinse eyes with plenty of water and call a physician immediately.

**IF ON SKIN:** Wash promptly with plenty of soap and water. Get medical attention.

**Note to Physician:** This product contains an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine. This product contains petroleum distillate solvent which may present an aspiration hazard. Gastric lavage may be indicated if product was taken internally.

- 6) Revise the text of the Physical and Chemical Hazards to read:

Flammable. Contents under pressure. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130 F may cause bursting.

- 7) Revise the Environmental Hazards to read as follows:

This pesticide is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Keep out of lakes, streams, ponds, tidal marshes, and estuaries. Do not apply directly to water or to areas where surface water is present. Do not contaminate water by disposal. This pesticide is highly toxic to bees exposed to direct treatment or to residues on blooming plants where they feed. Do not apply this product to or allow it to drift to food crops or any desirable vegetation at any time.

- 8) Directly under the heading "DIRECTIONS" add "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." [It appears correctly on the alternate brand name "Blast" label.]

- 9) It appears that you intend both outdoor and indoor use of this product. Presumably homeowner use, rather than commercial use is intended. If so, add "For use in and around the home" to the front panel. The directions should be divided into outdoor and indoor use sections, each with the appropriate heading, precautions, and directions. These sections should appear after the "To operate" section. Note that the "To operate" section of the "Blast" label should tell the user that when used indoors to use short light pressure for quick spurts only, if you think that valve is controllable enough for the average user not to release a cloud of pesticide indoors. Alternatively (and perhaps preferably), you may want to delete the indoor use directions (cockroaches, etc.) for the "Blast" product. It is noted that you have added "Dark stains may occur" to the "To operate" section. Does this staining also occur on indoor surfaces? Refer to the enclosed label for Ciba-Geigy's Home Pest Control Pressurized for the text of precautions about staining of floor and wall coverings, if this is also a problem with your product.

- 10) Under the "Outdoor Use" heading, the precautions should read:

Spray with wind to your back. Do not spray if wind is strong. If clothing becomes wet from spray during use, remove clothing

after spraying, wash affected body areas thoroughly with soap and water and launder clothing before wearing again. Do not allow children or pets to contact treated areas until spray has dried. Do not apply to lawns or other desirable plants.

- 11) Under the "Indoor Use" heading, the precautions should read:

Do not use this product indoors as an overall surface spray or as a space spray. Take care not to introduce this product into the air during application. Use only in well ventilated areas. Do not apply where children are likely to frequently contact treated surfaces. Do not treat pets or plants with this product. Remove pets and cover fish bowls before spraying. Do not apply when other persons are in the immediate area. Do not allow children or pets in treated areas until spray has dried. Do not apply to areas, surfaces, or utensils which will contact food or feed. Exposed food should be covered or removed during application. All food processing surfaces and utensils should be covered during application or thoroughly washed with soap and water before use. Do not use in edible product areas of food processing plants, restaurants, or other places where food is commercially prepared or processed.

- 12) In the directions for use on roaches, etc., after "... sinks, stoves." add "Do not spray inside cabinets where food is stored. Discard infested food packages. Do not spray across top of stove or near pilot lights."

A stamped copy of the label is enclosed for your records. Note that the Agency does not stamp alternate brand labels, eg. the "Blast" label, since they are to be identical to the master label except for name and artwork and possible deletion, but not addition, of uses. For your product there is admittedly slight text variance due to the type of release valves. Please submit revised labeling, which may be typewritten draft (especially recommended due the extensive number of revisions), within 3 months so that your next product batch can carry labeling incorporating the revisions indicated in this letter.

Sincerely yours,

George T. LaRocca  
Product Manager (13)  
Insecticide Rodenticide Branch  
Registration Division (H7505C)

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