

Reg # 3941-24
 300/301 / 169013/169011 P.M. 15
 17/17 / 5/4

JUN 18 1986

Mr. Seth Wissman
 Athena Products Corporation
 1919 Lone Star Drive
 Dallas, TX 75212

Dear Mr. Wissman:

Subject: Amendment-Additional Brand Name/Labeling Update
 Echols No-Roach/Echols Roach Killer and Echols No-Roach Kit
 EPA Registration No. 2019-27 and 3941-24
 Your Letters Dated February 6, 1985 and January 29, 1986

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

1. The additional brand names "Echols No-Roach Kit" and "Johnston's No-Roach Kit" are acceptable names.
2. The following comments refer to Echols Roach Killer, EPA Registration No. 3941-24.
 - a. The ingredient statement is very difficult to read. We suggest an enlargement of the print.
 - b. You must add to the front panel the following:

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**

This should follow the patent number.

- c. Following the signal word "CAUTION" add the referral statement "See back panel for additional cautions."
- d. The "Directions for Use" heading and wording should be preceded by the Precautionary Statements and Statement of Practical Treatment.

86053:Shell:LR-13;KENCO:6/10/86;6/16/86:sj:lf

86099:Shell:LR-13;KENCO:6/16/86;5/26/86:dsg:dsg

SYMBOL ▶							
SURNAME ▶							
DATE ▶							

- 1-2/4
- e. Following the "Directions for Use" add the heading "Storage and Disposal" followed by the wording, "Securely wrap container in several layers of newspaper and discard in trash. Do not reuse container."
 - f. We suggest underlining "If Swallowed:, If Inhaled:, If on Skin:, If in Eyes:, and Note To Physician:" subheadings. The use of colons is also useful in making these subheadings easier to identify.

The above information appeared on your previous labeling but was omitted from the finished label copy.

3. The following comments refer to Echols No-Roach Spray On, EPA Registration No. 2019-27.
 - a. The child warning statement should precede the signal word "CAUTION."
 - b. Preceding the "Misuse Statement" add the heading, "Directions for Use."
 - c. As was indicated in 2f please underline the Statement of Practical Treatment subheadings.
 - d. In the Note to Physician Statement revise the wording to read ". . . and may be administered in conjunction with atropine." We have added the words "in conjunction."
 - e. As was mentioned in 2d the "Directions for Use" must precede the "Precautionary Statements." Please change accordingly.

Please submit five (5) copies of your final printed labeling before you release the product for shipment.

Sincerely yours,

George T. LaRocca
 Product Manager (15)
 Insecticide-Rodenticide Branch
 Registration Division (TS-767C)

P.S. A stamped copy of the label is enclosed for your records.

KIT COPY

ECHOLS NO-ROACH KIT

EFFECTIVE Combination Treatment Kills and Controls Roaches!

ECHOLS NO-ROACH KIT

6 ROACH KILLING BAIT TRAYS

For convenient kitchen cabinet use. Place opened trays in cabinets or closets, behind or under fixtures or other areas where children and pets cannot reach. For best results place all trays out at one time. Repeat as needed.

SPRAY-ON INVISIBLE COATING

Use under sinks, between cabinets and appliances, in cracks and crevices, wherever you see roaches.



Item No. E-30

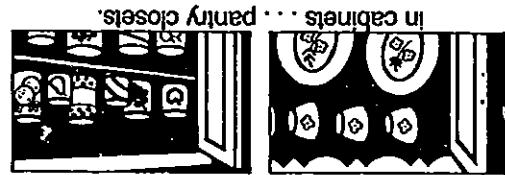
Follow directions and precautions on Echols Roach Killer and Echols No-Roach "Spray-it-on" labels.

ACCEPTED
with COMMENTS
by EPA Letter Dated:

JUN 10 1986

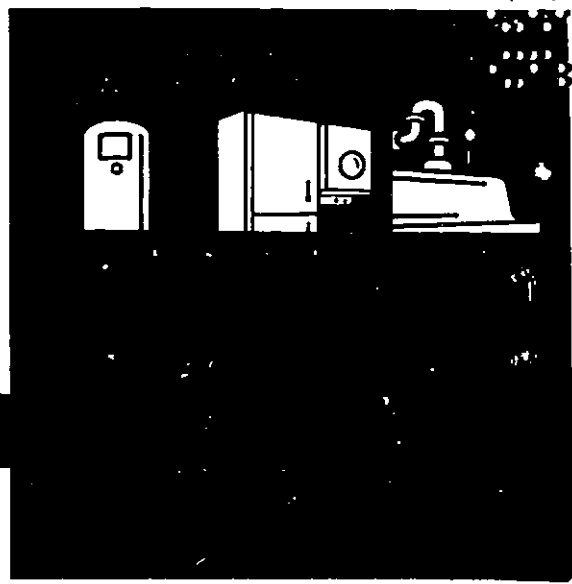
Under the Federal Insecticide, Fungicide, and Rodenticide Act
this product is a pesticide registered under EPA Reg. No.

3941-24



Place Bait Trays ...

6 Ready-to-Use Bait Trays for use in kitchen cabinets and pantry closets



SPRAY-ON

ECHOLS NO-ROACH

Spray-on Invisible Coating

Kills Roaches, Ants, Waterbugs and Silverfish

Active Ingredients:
 Malathion [0,0-Diethyl 0-(2-isopropyl-6-methyl-4-pyridinyl) phosphorothioate] 0.7%
 Diazinon [0,0-Diethyl 0-(2-isopropyl-6-methyl-4-pyridinyl) phosphorothioate] 0.3%
 Inert Ingredients 19.0%

CAUTION:
 Keep out of reach of children. **NET CONTENTS**
 See back panel for other cautions. **8 FL. OZS.**

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



Spray Echols No-Roach Coating around sinks, behind refrigerators, between cabinets, appliances and dark, damp areas.

Roaches, Waterbugs
 Easy to apply, No-Roach protects your home against roaches, ants, silverfish and waterbugs. Spray wherever you see roaches... It dries to form an invisible, odorless coating that provides effective roach control. Remove dishes and other items in cupboards and cabinets before applying No-Roach. Allow spray to dry before replacing items. Repeat when necessary. Coating is water removable.

Ants, Silverfish
 For ants, spray trails, doorways and window frames. For silverfish, spray baseboards, behind shelving. Apply No-Roach into cracks and crevices and around water pipes. Repeat when necessary.

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash. **Container Disposal:** Do not reuse container (bottle). Rinse thoroughly before discarding in trash.

Statement of Practical Treatment: If swallowed, call a physician or poison control center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with a finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. 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. If in eyes, flush with plenty of water. Call a physician if irritation persists. Note to physician: If symptoms of cholinesterase inhibition are present, atropine sulfate is antidotal. 2-Pam is also antidotal and may be administered with atropine.

Precautionary Statements: Hazards to humans and domestic animals. **Caution:** Keep out of reach of children. Harmful if swallowed. Do not allow children in treated areas until surfaces are dry. Avoid contact with skin. Avoid breathing of spray mist. Wash hands thoroughly with soap and water after using. Do not use No-Roach in food processing plants, restaurants or commercial food preparation areas. Avoid contamination of foods or utensils. Do not apply to radiators or ovens. Do not reuse container. Destroy when empty.

EPA Reg. No. 2019-27-3941-AA
 EPA Est. No. 4500-H.J.-1
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 ATHENA PRODUCTS CORPORATION
 1919 Lone Star Dr., Dallas, TX 75212 USA

Directions for Roaches, Ants, and Waterbugs:
 It is a violation of federal law to use this product in a manner inconsistent with its labeling. Place opened bait containers in several locations in each room where insects are seen or suspected. Place in cabinets, closets, behind or under fixtures and other areas where children and pets cannot reach. Repeat treatments as needed to maintain control by replacing bait containers.

PRECAUTIONARY STATEMENTS: HAZARD TO HUMANS AND DOMESTIC ANIMALS. CAUTION: May be harmful if swallowed or absorbed through the skin. Do not contaminate food or foodstuffs. Avoid prolonged skin contact. Wash thoroughly after using.

Statement of Practical Treatment: If swallowed call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with a finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. 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. If in eyes, flush with plenty of water. Call a physician if irritation persists. Note to physician: If symptoms of cholinesterase inhibition are present, atropine sulfate is antidotal. 2-Pam is also antidotal and may be administered in conjunction with atropine.

EPA Registration No. 3941-24-AA
 EPA Est. 3941-TX-1
 Sold by Athena Products Corporation
 1919 Lone Star Dr., Dallas, TX 75212 U.S.A.

BAIT

