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OCT 26 1988

Mr. Timothy J. Wright
Technical Director
Betco Corporation
1001 Brown Avenue
P.O. Box 3127
Toledo, OH 43607

Dear Mr. Wright:

Subject: Product Name Change
Betco Residual Insecticide Spray (Oil Based)
EPA Registration No. 4170-23
Your Amended Application Dated February 1, 1988

The labeling and product name change referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling.

- 1. Revise the environmental hazards statement to read as follows:

This product is toxic to fish and wildlife.
Birds feeding on treated areas may be killed. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters

- 2. Correct the first active ingredient to read "Diazinon [O,O-diethyl-O-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate]." Note use of Diazinon as a common name and the use of square brackets.
- 3. Revise the statement to read "Recommended for Use by Commercial Applicators."
- 4. Use in food handling establishments can imply use in U.S. Department of Agriculture (USDA) Meat and Poultry Plants. Therefore, either add the statement "Not for Use in USDA Meat

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and Poultry Plants," or submit an application to USDA requesting use in these areas. If granted, you can then indicate on the label that the product can be used in these areas.

5. Revise the food handling area statement to read:

Do not use in edible product areas of food processing plants, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed.

6. Delete "Kills Even Resistant Roaches" on the front panel since this claim is not supported with data. What are the roaches resistant to?
7. Delete petroleum distillates from the active ingredients and include it in the total percentage of inert ingredients since it is a solvent and not insecticidal.

Since it may present an aspiration hazard if the product was accidentally swallowed, add the phrase "Contains petroleum distillates" immediately beneath the ingredient statement.

8. Revise Note to Physician to read:

Solvent presents aspiration hazard. Gastric lavage is indicated if material was taken internally. Diazinon is 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.

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

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

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

Enclosure

