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DEC 15 1986

Mr. James P. Sickora  
J.C. Ehrlich Chemical Company, Inc.  
840 William Lane  
Reading, PA 19612

Dear Mr. Sickora:

Subject: Label Improvement Program and PR Notice 83-3  
Magic Circle Mill Insecticide  
EPA Registration No. 4704-13  
Your Amended Application Dated December 12, 1985

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provide that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
  - a. Add the statement "For AGRICULTURAL/COMMERCIAL USE ONLY" to the front panel of labeling.
  - b. We suggest the following statement:

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Call a physician or Poison Control Center immediately. Gastric lavage is indicated if material was taken internally. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

If inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.

86321: Heyward: LR-7: KENCO: 11/19/86: 1/2/87: dej: VO  
R: 86328: Heyward: LR-7: KENCO: 11/27/86: Y77/87: BJP: Vo

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If on skin - Remove contaminated clothing and wash affected areas with soap and water.

If in eyes - Flush eyes with plenty of water. Get medical attention 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.

- c. The Precautionary Statements subheading should be expressed as follows:

PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS AND DOMESTIC ANIMALS  
CAUTION

- d. The Environmental Hazards statement should be revised to read similar to the following:

This product is toxic to fish and other wildlife. Do not apply directly to any body of water. Do not contaminate water by cleaning of equipment or disposal of waste.

- e. Under Precautionary Statements, add the following:

When applying as space spray in enclosed areas wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety under the provisions of 30 CFR Part 11.

- f. Add the statement "Ventilate area thoroughly before reentering" to the paragraph beginning "small flying moths, mosquitoes . . . etc."
- g. Add the heading "Animal Buildings - Space Spray" above the paragraph beginning "For use in milk rooms . . . ." Also add the following statements to this paragraph "Remove animals from the building before application. Ventilate the area thoroughly before reentering."

- h. The statement should read ". . . have received direct application of DDVP or other organophosphate insecticides/drugs within 8 hours."
- i. Add the heading "Food Processing Plants, Industrial Plants - Space Spray" above the paragraph beginning "When used in food processing . . . ." Also, add the following statement to this paragraph:

Apply when plants are not in operation. Occupants should vacate before indoor treatments and should not reenter the building until it has been ventilated.

After application, open several windows or doors to create air current to insure ventilation and reduction of vapors. Food should be removed and food handling equipment covered with wrapping paper during application or washed after application is completed.

2. In regard to the Confidential Statement of Formula (CSF), we have no record of the Registration Number you have supplied for the DDVP technical indicated on the CSF. Please clarify/revise the CSF.
3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUTION Harmful if swallowed. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Keep away from food, feed or domestic water supplies. Wash thoroughly after handling. Do not allow children or pets to contact treated surfaces until spray has dried. Do not use on plants. Apply only as specified on this label. Remove pets and cover fish bowls before applications. Do not apply to pets.

ENVIRONMENTAL HAZARDS: Do not contaminate water by cleaning of equipment or disposal of waste. Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS: Do not use, pour or store near heat or open flame.

MAGIC CIRCLE MILL INSECTICIDE is a specially formulated space type spray containing Pyrethrins and Piperonyl-Butoxide. This formula is a contact insecticide that has fast knockdown. For additional killing power and penetrating ability, Dichlorovinyl dimethyl phosphite (DDVP) has been added. It has been designed for use in mills, industrial plants and food processing plants; but it can be effectively and economically utilized in restaurants and milk rooms.

DIRECTIONS FOR USE

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

SMALL FLYING MOTHS, FLIES, MOSQUITOES, WASPS: Spray upwards into four corners of room for 10 - 15 seconds per 1000 cubic feet (apply with electric sprayer) with approximately 2 ounces of MAGIC CIRCLE MILL INSECTICIDE. Close windows for about 15 minutes after treatment.

COCKROACHES, ANTS, SPIDERS AND SILVERFISH: Spray cracks of woodwork, walls, floors, around doors and window frames, baseboards behind shelving of storage areas, and other places where these insects may congregate or hide.

magic circle

MILL INSECTICIDE

EPA Reg. No. 4704-13

EPA Est. No. 4704-PA-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call physician or Poison Control Center immediately. Do not induce vomiting. Aspiration may be a hazard.

NOTE TO PHYSICIAN: Contains petroleum distillate. If gastric lavage is deemed necessary, undertake only after proper placement of a cuffed endotracheal tube. Active ingredient contains a cholinesterase inhibitor. Treat symptomatically. Atropine is an antidote.

IF IN EYES: Flush with plenty of water. Get medical attention.

IF ON SKIN: Remove contaminated clothing. Wash affected area with soap and water. Launder clothing before reuse. Discard shoes or other gear that can not be decontaminated.

IF INHALED: Remove to uncontaminated environment.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS

Manufactured by:

J. C. EHRLICH CHEMICAL CO., INC. Reading, PA 19612

ACCEPTED FOR REGISTRATION COMMENTS EPA Insecticide Division

DEC 15 1986

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this insecticide is registered. No. 4704-13

For use in MILK DAIRY BUILDINGS of the product. CIDE per 1000 ment as much or foodstuffs, r as a space spr application with

When used in f or covered du should be cov before using. C apply only when

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(Liquids above food or feed by container in a animals.

INSECTICIDE DIS product may b disposal facility

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