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AUG 31 1995

Ms. Christina Lawes
AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

Dear Ms. Lawes:

Subject: Follow-up to Agency letter dated August 29, 1995
Pyrenone Diazinon Residual Spray
EPA Registration No. 4816-333
Your submission dated October 15, 1993

In regard to the Agency's acceptance letter dated August 29, 1995, please disregard the instructions in item "g" of that letter related to the exception to the text of the format guide label (the now-cancelled EPA Reg. NO. 4816-517) about revising the limited spot application directions for food areas of food/feed handling establishments. The subject product is registered only as a crack and crevice spray in such areas. Do not add text from the guide label pertaining to limited spot treatment in such areas.

Sincerely,

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

493211

AUG 29 1995

Ms. Christina Lawes
AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

Dear Ms. Lawes:

Subject: Amendment- Revise per Diazinon Registration Standard
Pyrenone Diazinon Residual Spray
EPA Registration No. 4816-333
Your submission dated October 15, 1993

This amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable, provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. The Diazinon Registration Standard stipulates that diazinon products used outdoors other than around the home are classified for Restricted Use and must bear the appropriate Restricted Use block at the top of the front panel. Assuming that is not your marketing intention for this product, then modify the outdoor use pattern (see item "h" , below) and revise the front panel claim to read "Quick acting surface spray for indoor use in homes, institutions, restaurants, and food processing plants. For outdoor use on building surfaces and around the home only."

b. Delete the sentence "Kills even resistant roaches", or specify the type of pesticide resistance. Such a claim would, of course, have to be backed by efficacy data.

c. Revise "This product...poultry, plants." to read "This product is approved by USDA for use in Federally inspected meat and poultry plants."

d. Under INDOOR USE, replace the **Precautions** section with "(1) 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. (2) Use only in well-ventilated areas. (3) Do not apply where children are likely to frequently contact treated surfaces. (4) Do not apply in patient rooms or in any rooms occupied by the elderly or infirm. (5) Do not apply to classrooms when in use. (6) In institutions (including but not limited to office buildings, museums, libraries, and sports facilities), do not apply when occupants are present in the immediate area. (7) Remove or cover fish bowls and remove pets before application. (8) Do not treat pets or plants with this product. (9) Do not allow children or pets in treated areas until spray has dried. (10) If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again. (11) Do not apply directly to upholstery or furniture. (12) Do not apply to areas, surfaces, or utensils which will contact food or feed. (13) Exposed food should be covered or removed during application. (14) Do not use in conduits, motor housings, or electrical switch boxes."

e. Under the heading **Indoor Use**, the label should be divided into Food/Feed Area directions and Locations other than Commercial Food/Feed Establishments, similar to your label for Pyrenone Diazinon EC (EPA Reg. No. 4816-517). A copy of that now canceled product label is enclosed as format guide.

The format of the label should be as follows:

Indoor Use

Precautions

Food and Feed Handling Establishments

Food Areas- Crack & Crevice Treatment

Non-Food Areas- Spot Treatment

Locations other than Commercial Food Establishments

Cockroaches, Ants, Silverfish, Spiders, Crickets

Carpet Beetles

Brown Dog Ticks

Outdoor Use

Precautions

Flies, Mosquitoes, Wasps and Small Flying Moths
Fleas, Chiggers, Ants

f. Replace the definition for Food/Feed Areas of Food/Feed Handling Establishments with the following: Includes areas for receiving, serving, storage (dry, cold, frozen, raw), packing (canning, bottling, wrapping, boxing), preparing (cleaning, slicing, cooking, grinding), edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups).

g. Replace the Crack & Crevice directions for control of cockroaches, etc. with the text appearing for that section on the format guide label (EPA Reg. No, 4816-517) with the exception that "Limit individual spot treatments to an area no larger than 20% of the floor surface." should read "Limit the sum of individual spot treatments to an area no larger than 20% of the floor surface."

h. Under the heading **Non-Food Areas**, add the heading "SPOT TREATMENT" before "As a spot..." and delete the sites "refrigerators" and "stoves" and add "lockers" and "pallets".

i. Since the Spot Treatment directions referred to above are for Non-Food areas of Food Processing Plants, you will want to add directions for control of similar pests under the heading **Locations Other than Commercial Food Establishments**. This section would read as follows:

Apply as a spot treatment to baseboards, areas around water pipes, cracks and crevices, and to surfaces behind and beneath cabinets, refrigerators, sinks, stoves, and to similar areas where these pests hide. Repeat as necessary.

j. Add an **OUTDOOR USE** section "**PRECAUTIONS:** 1) Spray with wind to your back. 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. 2) Do not allow children or pets to contact treated areas under spray has dried. 3) Do not apply to lawns or other desirable plants."

k. Replace CHIGGERS, ANTS, BROWN DOG TICKS AND CLOVER MITES

OUTDOORS: section with "For treatment of localized infestations of insects in outdoor areas **around the home only**, spray infested areas. Do not apply to lawns or other desirable plants. Do not spray fruit or vegetable plants with this product. For ants, wet hills and runways. Repeat as necessary."

1. Replace the **STATEMENT OF PRACTICAL TREATMENT** section with the following:

IF SWALLOWED: Call a physician or Poison Control Center immediately. **DO NOT INDUCE VOMITING.** Vomiting may cause aspiration pneumonia. Do not give anything by mouth to an unconscious or convulsing person.

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

IF ON SKIN: wash promptly with soap and water. Get medical attention.

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

Note to Physician: This product 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. This product contains a petroleum distillate solvent, which presents an aspiration hazard. Gastric lavage may be indicated if product was taken internally.

m. Under **HAZARDS TO HUMANS AND DOMESTIC ANIMALS** replace "Harmful if swallowed...until spray has dried." with "Harmful if swallowed, inhaled, or absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling and before eating or smoking. 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 cover fish bowls before spraying. Do not allow children or pets in treated area until sprayed surfaces have dried."

3. Submit three (3) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

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 constitutes acceptance of these conditions.

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

Your current Confidential Statement of Formula (CSF) does not list the impurities of toxicological concern separately nor does it include the diazinon certification for FIFRA Sec. 12(a)(1)(C), that the description of this product refers to the composition set forth on the CSF and supporting materials as required by the Diazinon Registration Standard, as well as the certification regarding the determination of the certified limits of the toxicological significant impurities, i.e., reliance on your supplier's analysis of their technical. Please check with your supplier in this regard and update your CSF accordingly within 60 days.

Sincerely,

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

Enclosure

PYRENONE[®] DIAZINON RESIDUAL SPRAY

- EPA Reg. No. 4816-333 EPA Est. No.
- * For Commercial/Industrial Use Only
 - * Residual Type Insecticide
 - * Quick Acting Surface Spray for Indoor and Outdoor Use in Homes, Institutions, Restaurants and Food Processing Plants
 - * Kills cockroaches, ants, flies, mosquitoes, fleas (outdoors) waterbugs, wasps, brown dog ticks, silverfish, spiders, crickets, chiggers, small flying moths and carpet beetles.
 - * Kills even resistant cockroaches!
 - * This Product Is Authorized For Use In USDA MEAT AND POULTRY PLANTS.

ACTIVE INGREDIENTS:

Pyrethrins	0.052%
*Piperonyl Butoxide	0.261%
Diazinon: [0,0-Diethyl 0-(2-Isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate	0.500%
**INERT INGREDIENTS:	99.187%
	100.000%

*Equivalent to 0.209% (butylcarbityl) (6-propylpiperonyl) ether and to 0.052% related compounds
 **Contains Petroleum Distillate

PYRENONE - Registered Trademark of Roussel Uclaf Corporation

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back Panel for A.D.C. and P.O.A.B. No.

NET CONTENTS: _____

ROUSSEL UCLAF

Roussel Uclaf Corporation
 95 Chestnut Ridge Road
 Montvale, New Jersey 07645

72260 05/0290

DIRECTIONS FOR USE

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

INDOOR USE:

Precautions: Use only in well ventilated areas. If clothing is sprayed during application, remove clothing immediately after spraying, and launder before wearing again. Do not allow children or pets to contact treated surfaces until spray has dried. Do not apply this pesticide when class rooms are in use. Do not apply this pesticide in the immediate area when occupants are present. Remove pets, birds and cover fish aquariums before spraying. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before reuse.

Food And Food Handling Establishments Crack And Crevice And Spot Treatments - Places other than private residences, in which food is held, processed, prepared and/or served.

Food And Feed Establishments - Apply as a crack and crevice treatment as directed below.

FOOD AREAS - Application limited to crack and crevice treatment only; includes areas for receiving, serving, storage (dry, cold frozen, raw), packaging (cleaning, slicing, cooking, grinding), edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups).

To control **Cockroaches, Ants, Waterbugs, Silverfish, Spiders and Crickets:** Apply spray in small amounts directly into cracks and crevices using equipment capable of delivering a pin stream of insecticide. Includes expansion joints, spaces between equipment and floors, and openings leading to voids and hollow spaces in walls, equipment legs and bases. Do not use this product in conduits, motor housings, and electrical switch boxes.

Applications Of This Product In The Food Areas Of Food Handling Establishments Other Than As A Crack And Crevice Treatment Are Not Permitted.

NON-FOOD AREAS - Includes garbage rooms, lavatories, floor drains (to sewers) entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, mop closets, and storage (after canning or bottling). As a spot treatment apply as a coarse low pressure fan spray to floor surface areas around water pipes, beneath cabinets, refrigerators, sinks, stoves, storage areas, baseboard areas, around

water pipes, surfaces behind tables, pallets and similar areas, spiders, and silverfish hide under. Repeat treatment as needed. Do not use as a space

Carpet Beetles: Spray carpeting and rugs. Make sure and baseboards. Spray down infested areas of shelving.

Brown Dog Ticks: Thoroughly spray animals. Spray infested window and door frames, and should be repeated as needed. Do not place in animal quarters.

DO NOT TREAT ANIMALS

OUTDOOR USE:

Precautions: When using your back. If clothing becomes wet, remove clothing after spraying, thoroughly with soap and water before wearing again.

Flies, Mosquitoes, Wasps: For outdoor use only as an alternative to these insects. Spray outdoors window frames or wherever insects are congregating. Also treat surfaces in garages, and other places where insects congregate.

Fleas, Chiggers, Ants: For control of these insects in outdoor areas, spraying desirable plants, lawns and runways. Repeat applications as needed and as reinfestations occur.

ACCEPTED FOR STORAGE
 Do not contaminate water
 disposal.

AUG 29 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 4816-333

BEST COPY AVAILABLE

Pesticide Storage And Procedures: Store upright at room temperature. Avoid exposure to extreme temperature. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

Pesticide Disposal: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.

Containers One Gallon And Smaller: Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED - Contact 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.

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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. May be absorbed through skin. May cause contact sensitization following repeated contact with skin in susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. Avoid inhalation and skin contacts; wash thoroughly after using. Do not use on household pets or humans. Avoid contamination of food and feedstuffs. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Remove pets and remove or cover fishbowls before spraying. Do not allow children or pets to contact treated areas until spray has dried.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to birds, fish and wildlife including waterfowl. Birds and waterfowl feeding or drinking on treated areas may be killed. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Shrimp and crab may be killed at applications rates recommended on this label. Do not apply where fish, shrimp, crab, and other aquatic life are important resources.

This pesticide is highly toxic to bees exposed to direct treatment or residues on blooming plants where they feed. Do not apply this pesticide or allow it to drift to blooming plants if bees are visiting the treatment area. Do not apply this product or allow it to drift to food crops or any desirable vegetation. Apply this product only as specified on this label.

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

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