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SEP 14 1988

Mr. Jan Brill
Regulatory Specialist
Fairfield American Corporation
8th & Harrison Streets
Frenchtown, NJ 08825

Dear Mr. Brill:

Subject: Storage Stability Study and Alternate
Formulation - Revised Labeling
Roach & Ant Spray Aqueous
EPA Registration No. 4816-541
Your Amended Applications Dated January 27
and February 19, 1988

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided the following corrections are made:

1. In the Environmental Hazards section, change the statement pertaining to contamination of equipment to read "Do not contaminate water when disposing of equipment washwaters."
2. Revise the front panel statement to read "Use in Homes, Garages, and the Nonfood Areas of Motels, Hotels, Institutions, Warehouses, Restaurants, and Food-processing Plants."

53167:J/C:Heyward:LLR-9:KENCQ:9/7/88:10/19/88:rw:vo:rw

CONCURRENCES

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3. Revise the paragraph beginning "Do not use in edible product areas . . . etc." to read as follows:

Food handling establishments, restaurants
Do not use in food areas of ~~restaurants~~ or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers, entries, and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

4. Use in food handling establishments can infer use in U.S. Department of Agriculture (USDA) Meat and Poultry Plants. Therefore, either add the statement "Not for Use in USDA Meat 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. It is unclear if this product is ready to be applied from its original container. However, it appears that your product (although labeled "Ready-To-Use") requires transfer to a separate (unlabeled) container for application. We discourage indoor use of pesticides by the lay person unless it is ready to be applied as marketed (as in a pump spray or aerosol formulation). This prevents the potential exposure to children and pets from ingesting/contacting the pesticide in containers such as coffee cans (for paint brush application) and Windex or other similar bottles which are commonly used by homeowners.

Allowing homeowners to use containers other than the product container to apply the pesticide defeats the purpose of the label instructions, precautions, and first aid treatment, since the information would not be readily available for use should exposure occur. If this product must be transferred to another container or application equipment to be applied, we recommend adding the following statement to the front panel "Recommended for Use by Commercial Applicators."

The storage stability data for the alternate formulation at room temperature are acceptable. We noted, however, that at ambient temperature, sufficient active degradation occurs for both formulations. This must be corrected either through adjustment of the Confidential Statement of Formula (CSF) or by the incorporation of an expiration date for use of the product. Please respond accordingly.

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You must also submit storage stability data, in which the formulated product is analyzed for its active ingredient at time zero and during a year of storage at elevated temperatures. The storage should be in warehouse conditions of temperature and humidity and stored in similar containers you will be using in the trade to simulate product degradation under warehouse conditions.

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

Sincerely yours,

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

Enclosure

ROACH & ANT SPRAY AQUEOUS

CONTAINS PYRENONE® & DIAZINON

EPA REG. NO. 4816-541

EPA EST. NO. 279-NY-1

A WATER BASE INSECTICIDE WITH FLUSHING AND QUICK KNOCKDOWN CHARACTERISTICS.

RESIDUAL — REMAINS EFFECTIVE FOR TWO WEEKS

KILLS FLEAS, COCKROACHES, ANTS, SILVERFISH, WATERBUGS AND BROWN DOG TICKS.

USE IN HOMES, MOTELS, HOTELS, INSTITUTIONS, GARAGES, WAREHOUSES AND NON-FOOD AREAS OF RESTAURANTS AND FOOD PROCESSING PLANTS.

USE THIS PRODUCT AS IS!

ACTIVE INGREDIENTS:

Pyrethrins	0.052%
*Piperonyl Butoxide, Technical	0.260%
**Diazinon	0.500%
INERT INGREDIENTS:	99.188%
	100.000%

*Equivalent to min. 0.208% (butylcarbityl) (6-propylpiperonyl) ether and 0.052% related compounds.

**0,0-Diethyl 0-2 (isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate

PYRENONE — Registered Trademark of Fairfield American Corporation

KEEP OUT OF REACH OF CHILDREN WARNING

NOTE TO PHYSICIAN: 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 used, but only in conjunction with atropine.

DO NOT TRANSPORT OR STORE UNDER 32 F

DIRECTIONS FOR USE

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

Spray infested surfaces until wet. Do not use as a space spray.

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.

Remove pets and cover or remove fish bowls before spraying. Do not allow children to contact treated surfaces until surfaces are completely dry.

TO KILL: Ants, Crickets, Cockroaches, Silverfish, Spiders. Spray areas where these pests are found or may hide, including dark corners of rooms and closets, cracks, crevices, along baseboards and door sills and frames, behind and beneath sinks, stoves, refrigerators, cabinets and around garbage cans, plumbing and other utility installations. Pests flushed out of hiding should be sprayed directly. Treat ant trails, nests and points of entry. Repeat treatment as necessary.

TO KILL: Carpet Beetles. Spray edges of carpeting and under carpeting and rugs. Make localized application to the floor and baseboards. Spray directly into cracks, crevices, closets and infested areas of shelving. Repeat as necessary.

TO KILL: Fleas and Brown Dog Ticks, Indoors. Clean premises thoroughly before treatment. Using a coarse cone or fan spray, treat the entire floor and carpet area. Special attention should be given to cracks, crevices and under carpet and rug edges. Also treat animal sleeping quarters, closets, upholstered furniture (with particular attention to seams), beds, under sofas and other furniture. In animal sleeping quarters bedding should be cleaned or replaced with fresh bedding. Do not use this application in nurseries or any area where infants may sleep. Apply at the rate of approximately 1 gallon to 750 square feet (17 fl. oz. per 100 sq. ft.). To avoid reinfestation, pets must be treated simultaneously with an E.P.A. approved insecticide labeled for use on animals. Application should be repeated as necessary. Humans and pets should avoid contact with treated surfaces (rugs, upholstered furniture, etc.) for 4 hours after treatment.

TO KILL: Flies, Mosquitoes, Small Flying Moths, Wasps. For outdoor use only as an aid in reducing annoyance from these pests. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures or porches, in garages and other places where these insects alight or congregate.

TO KILL: Fleas, Chiggers and Ants, Outdoors. For treatment of localized infestation of these insects in outdoor areas, spray weeds and bushy non-crop areas around the home thoroughly. Avoid spraying desirable plants. For ants, thoroughly wet hills and runways. Repeat applications as reinfestations warrant and as reinfestations occur.

STORAGE AND DISPOSAL

Containers larger than one gallon.

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE AND SPILL PROCEDURES: Store upright at room temperature. Avoid exposure to extreme temperatures. 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. Protect from freezing. Do not transport or store under 32°F.

PESTICIDE DISPOSAL: Waste resulting from the use of this

product may be disposed of at a disposal facility.

CONTAINER DISPOSAL: Tri recycling or reconditioning, or landfill or by other approved S

Containers one gallon or less

STORAGE: Store in original inaccessible to children and p

DISPOSAL: Wrap container discard in trash.

PRECAUTION HAZARDS TO HUMANS

May cause temporary eye injury or safety glasses. Harmful if skin. Avoid breathing of spray clothing. Remove contamination. Wash thoroughly after handling. Do not allow spray to contact food contaminated by this spray. Do not allow humans.

STATEMENT OF

IF SWALLOWED: Call a physician immediately. Drink one or two glasses of water by touching the back of the tongue. If fluid is clear. Do not induce vomiting. If unconscious, do not give anything by mouth.

IF INHALED: Remove victim to fresh air. If indicated.

IF ON SKIN: Remove contamination. Wash areas with soap and water.

IF IN EYES: Flush eyes with water.

ENVIRONMENT

This product is toxic to fish, if directly to water. Do not contaminate water. Do not dispose of equipment or disposal of waste specified on this label.

Buyer assumes all risks of use not in strict accordance with

NET CONTENTS: _____



FAIRFIELD
AMERICAN
CORPORATION
201 Rt. 17 North, Rutherford, NJ 07070

CODE 722.75

PRODUCT DESCRIPTION

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 14 1983

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

4816-541

Name: **ROACH & ANT SPRAY AQUEOUS** contains PYRENONE® and DIAZINON
EPA Reg. No. 4816-541

Type: **Ready-To-Use Water Base Liquid Micro Emulsion**

Mode of Action: **A quick acting, long lasting insecticide**

Use Locations: **Residential, food plant and industrial areas; indoors and outdoors**

Insects Controlled: **Over a dozen common pests indoors, including fleas and ticks indoors**

Application: **Spray infested areas until wet**

Equipment: **Hand or power operated mechanical or compressed air sprayers adjusted to deliver a coarse droplet spray**

USDA Acceptance: **April 25, 1978 in inedible product areas of Federally inspected meat and poultry plants**

Physical Data:	Specific Gravity (20/20°C):	1.006	Color (G-H):	2-3
	Pounds/Gallon:	8.38	Flash Point (TCC):	>200°F

Shipping Containers:	55 gallon drum	509 pounds gross	461 pounds net
	5 gallon can	47 pounds gross	42 pounds net
	1 gallon can (4/ctn)	38.6 pounds gross	33.6 pounds net (8.4 lb/gal)

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7/18/83

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