UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SEP - 5 1995

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

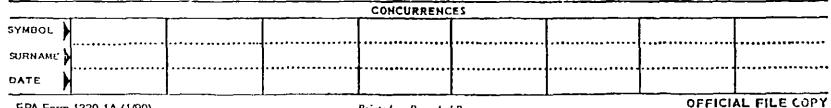
Dear Ms. Lawes:

Subject: Amendment - Diazinon Registration Standard Pyrenone Diazinon Water Based Pressurized Spray II EPA Req. No. 4816-663 Your submission dated October 15, 1993

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

- Submit and/or cite all data or other materials required for 1) registration/reregistration of your product under section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
- Make the labeling changes listed below before you release the 2) product for shipment bearing the amended labeling:
 - a) Revise the front panel claim "Ticks" to "Brown Dog Ticks".
 - b) The Agency is confused by the apparent inclusion of this product on USDA's Food Safety and Inspection Service's "List of Proprietary Substances and Non-Food Compounds". There are no label claims or directions for use in either food or nonfood areas of food processing plants included on this label. Please explain. The current indoor use directions are not · correct for even use in non-food areas of food processing plants (but are correct for the residential and garage uses claimed on the front panel).
 - c) Revise the INDOOR USE Precautions to read as follows:

Do not use this product indoors as an overall surface spray or



as a space spray; take care not to introduce the product into the air during application. Use only in well-ventilated areas. Do not apply where children are likely to frequently. contact treated surfaces. Remove or cover fish bowls or aquariums and remove pets before application. Do not treat pets with this product. Do not allow children or pets in treated areas until spray has dried. Do not apply this product in patient rooms or any rooms occupied by the elderly or infirmed. Do not apply when classrooms are in use. Do not apply when occupants are present in the immediate area. Do not apply in food handling establishments, restaurants, or other areas where food/feed is commercially processed, prepared, or served. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed with soap and water before use; exposed food should be covered or removed. Do not apply directly to conduits, motor housings, or electrical switch boxes due to the possibility of shock hazard. If clothing becomes wet during spraying, remove clothing immediate after spraying, wash affected areas with soap and water, and launder clothes before wearing again.

d) Revise the OUTDOOR USE Precautions to read as follows:

Do not use this product outdoors other than to spray the outside surface of structures as directed. Do not apply to lawns or to other desirable vegetation. Spray with the 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. Do not allow children or pets to contact treated areas until spray has dried.

- e) In the Statement of Practical Treatment, revise the last sentence of the If swallowed advice to read: "Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.". Add "Get medical attention." to the end of the If inhaled and the If on skin advice.
- f) At the end of the Statement of Practical Treatment add a NOTE · TO PHYSICIAN as follows: 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.
- g) Revise the first sentence of the Hazards to Humans and Domestic Animals to read as follows: "Harmful if swallowed,

inhaled or absorbed through skin.". You may delete "Avoid

repeated contact with skin" form this same section, since the precaution "Avoid skin and eye contact." already appears.

- h) Revise the first paragraph of the ENVIRONMENTAL HAZARDS to read as follows (retain the current second paragraph as is): This pesticide is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Keep out of lakes, streams, ponds, tidal marshes, and estuaries. Do not contaminate water by disposal. Apply this product only as specified on this label.
- 3) A revised Confidential Statement of Formula (CSF) must be submitted which should include upper certified limits for the impurities of toxicological concern as identified in the Diazinon Registration Standard (TEPP, 0,S-TEPP, S,S-TEPP, and oxo-diazinon), and should include signed and dated certification statements relative to FIFRA Sec 12 (a)(1)(C) and the method of arriving at the certified limits for the impurities (i.e., either your own chemical analysis or, more likely, your reliance on your supplier's analysis of their product which is your diazinon source) and addressing data requirements under Guidelines 61-3 and 61-2b. The text of these certification statements is as follows:

I hereby certify that, for the purposes of FIFRA Sec.12(a)(1)(C), the description of the composition of [your product's name], EPA Reg. No. [insert correct number for your product], refers to the composition set forth on this Statement of Formula and supporting materials. This description includes the representation that (1) no ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit specified for that ingredient in this Statement of Formula; and (2) if the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

I certify that the upper certified limits for the impurities listed on this Statement of Formula are based on [your supplier's name] analysis and certification of limits for this product based on [name of source product that your supplier has analyzed]. I further certify under Section 61-3 and 61-2(b) that there are no chemical reactions between diazinon and/or its impurities with

the intentionally added inerts.

If you do not already have the impurities information required on the CSF, please immediately contact your supplier directly.

Sincerely,

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

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EPA Reg. No. 4816-663

EPA Est. No.

- * Pyrenone® Provides Flushing Action and Fast Knockdown
- * Kills Cockroaches, Ants, Spiders, Ticks and other insects listed in the Directions for Use.
- * Use in and around Homes, Apartments, Garages, Motels and Hotels.
- * A residual insecticide which controls listed pests for as along as two weeks.
- * Use outdoors as an aid in reducing annoyance from Files and Mosquitoes entering the home.

ACTIVE INGREDIENTS:

Pyrethrins	0,052%
*Piperonyl Butoxide	
Diazinon: [0,0-Diethyl 0-(2-Isopropyl-6-methyl-	
	0.500%
4-pyrimidinyl)phosphorothioate **INERT INGREDIENTS:	99.188%
	100.000%

*0.208% (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 Side and Rear Panelle, for Additional Precautions

NET CONTENTS:



95 Chestnut Ridge Road Montvate, New Jersey 07645

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DIRECTIONS FOR USE

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

Shake Well Before Use

To operate hold can upright, direct orifice toward the surface to be treated, and press the actuator button. Do not use as a space spray.

INDOOR USE:

Precautions: Use only in well-ventilated areas. If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing as in. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Do not allow children or pets to contact treated areas until spray has dried

To kill Ants, Carpet Beetles, Centipedes, Cockroaches, Crickets, Earwigs, Firebrats, Silverfish, Spiders and Pilibugs: thoroughly apply as a spot treatment to areas where these pests are found or may hide, including dark corners of the rooms and closels, cracks and crevices, under camets, along baseboards and door sills and frames; behind and beneath sinks, stoves, refrigerators, and cabinets and around garbage cans, plumbing and other utility installations. Pests driven out of hiding places should be sprayed directly. Spray ant trails, nests and points of entry.

To kill Brown Dog Ticks: apply thoroughly as a spot treatment to infested areas such as pet beds and resting quarters, and nearby cracks and crevices: along and behind baseboards, windows and door frames and localized areas of floor and floor covering where these pests may be present. Fresh bedding should be placed in animal quarters following treatment. Do not spray pets with this product.

OUTDOOR USE:

Precautions: Spray with the 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. Do not allow children or pets onto a treated area until the treated area such as grass or soil has dried.

To control House Files, Gnats Small Flying Moths, Wasps at only on outdoor surfaces. Spray dow and door frames and other may enter the home. Also spray or resting areas, such as under eave in garages where these insects mosquitoes coming to rest on killed. Repeat treatment when e

STORAGE AND I

STORAGE: Store in a cool, dry store below 32°F.

DISPOSAL: Wrap container in se and dispose of in trash. Do not

STATEMENT OF PRACTI

IF SWALLOWED - Contact a ph Center immediately. Drink one of induce vomiting by touching the Repeat until vomit fluid is clear, give anything by mouth to an un-IF INHALED - Remove victim to respiration if indicated.

IF ON SKIN - Remove contam affected areas with soap and wa IF IN EYES - Flush eyes with ple attention if irritation persists.

PRECAUTIONARY S HAZARDS TO HUMANS AND CAUTIO

Harmful if swallowed. Keep out of breathing spray mist. Avoid st cause contact sensitization followskin in susceptible individuals. A skin. If sensitization reactions rewash thoroughly after handling ing.

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Continued on F

Under the Federal Frangleide, and Rosic as amended, for the registered under EP. 4816-6

PRECAUTIONARY STATEMENTS (CONTINUED)

Do not allow children or pets to contact treated surfaces until spray has dried. Do not spray air in rooms or use on plants. Apply as a surface spray only. Do not allow spray to contact food, feedstuffs or water supplies. Thoroughly wash dishes and food handling utensils contaminated with this product. Remove pets and cover fish aquariums before spraying.

ENVIRONMENTAL HAZARDS

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

This pesticide is highly toxic to bees exposed to direct treatment or to residues on blooming plants where they feed. Do not allow this pesticide 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 at any time.

PHYSICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

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