

SEP 18 1992

Mrs. Kelly Rahn
KEM Manufacturing
P.O. Box 152170
Irving, Texas 75015-2170

Dear Mrs. Rahn:

Subject: Revised Labeling and Confidential Statement of Formula
KEM-Kill-B
EPA Registration No. 5197-36
Your Submission Dated June 3, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

Additionally, several changes must still be made to the product labeling, as follows:

1. In the instructions for Storage and Disposal, delete the reference to "smaller containers," as well as the associated text. This information is appropriate for homeowner products only.
2. Revise the Directions for Use on fleas, chiggers, ants, and brown dog ticks, outdoors. Treatment for these pests is limited to perimeter applications only, open areas, whether vegetation is present or not, may not be treated with products containing propoxur. The statement "Do not spray vegetation" must also be added to the perimeter application instructions.
3. Delete the statement: "Applications of this product in the home should be limited to spot treatments only."
4. In the Statement of Practical Treatment for "If In Eyes," replace "Flush with water for fifteen minutes" with "Flush with plenty of water."

In our letter of May 1, 1992, we inadvertently gave you incorrect instructions for revision of the Physical and Chemical

Hazards statement. Since this product is not an aerosol, the statements "Contents under pressure...Do not puncture or incinerate...etc" are inappropriate. We have crossed these statements off the labels.

We have also reviewed your updated Confidential Statement of Formula (CSF), which you have revised in accordance with PR Notice 91-2, to express the active ingredients in terms of the nominal concentrations. The CSF is acceptable, and we have added it to our file for this product.

Please make the label revisions noted above and submit five copies of your final printed labeling before you release the product for shipment. If you have any questions concerning this letter, please contact me at (703)-305-6386.

Sincerely,

DHE

Dennis H. Edwards, Jr.
Product Manager 19
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 18 1982

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
5197-36

COLUMN 1

KEM

KEM KILL-B

RESIDUAL INSECTICIDE

**RESIDUAL SPRAY
KILLS RESISTANT ROACHES**

Recommended for the control of roaches, ants, and other insect pests, resistant and non-resistant in hospitals, institutions, supermarkets, bakeries, warehouses, as a spot treatment.

ACTIVE INGREDIENTS:

Pyrethrins.....	.052%
*Piperonyl butoxide, technical.....	.104%
N-octyl bicycloheptene dicarboximide.....	.174%
**2-(1-Methylethoxy) phenol methylcarbamate.....	0.643%
***INERT INGREDIENTS:.....	<u>99.027%</u>
TOTAL	100.00%

*Consists of .08% (Butylcarbityl) (6-propylpiperonyl) ether and .02% related compounds.

**U.S. Patent No. 3,111,539.

***Contains Petroleum Distillates

CAUTION

KEEP OUT OF REACH OF CHILDREN

See Side Panel for Additional Precautions

EPA Reg. No. 5197-36

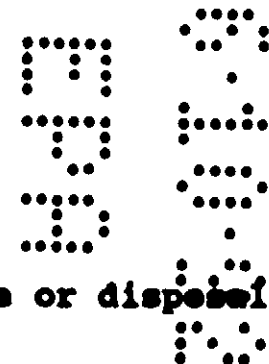
NET CONTENTS:

**KEM Manufacturing
Division of Systems General, Inc.
5950 Live Oak Parkway
Norcross, GA 30093-1717**

COLUMN 2

DIRECTIONS

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



STORAGE AND DISPOSAL

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

Storage: Keep container closed. Do not store near fire, open flames or sparks. Avoid contamination of feed, food, food processing equipment and food handling surfaces.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at 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 procedures approved by state and local authorities.

Smaller Containers: Do not reuse container. Rinse thoroughly before discarding in trash.

Spray infested surfaces only until wet. Point spray away from people, plants, and pets.

ROACHES, ANTS, WATERBUGS, SILVERFISH, SPIDERS, CRICKETS: Spray heavily in all cracks around baseboards, and other places where these insects hide. Also spray until wet, surfaces behind and beneath cabinets, refrigerators, sinks and stoves. Use on other localized areas infested with these pests. Repeat treatment as necessary. Do not spray foodstuffs or house plants.

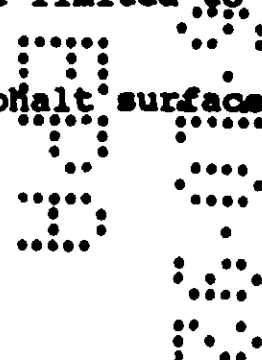
CARPET BEETLES: Make localized application to areas of the floor and baseboards, spray directly into cracks, and under carpets where insects may be found. Treat crevices, cracks, or closets and infested areas of shelvings. Repeat as necessary.

FLIES, MOSQUITOES, WASPS AND FLYING MOTHS OUTDOORS: For outdoor use only as an aid in reducing annoyance from these insects. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages, and other places where these insects alight or congregate.

FLEAS, CHIGGERS, ANTS AND BROWN DOG TICKS OUTDOORS: For treatment of localized infestations of these insects in outdoor areas where there is no vegetation, spray infested areas thoroughly. For ants, thoroughly wet hills and runways. Repeat applications as necessary.

Applications of this product in the home should be limited to spot treatments only.

Avoid excessive wetting of plastic, rubber and asphalt surfaces such as tiles and floor coverings.



COLUMN 3

FOOD HANDLING ESTABLISHMENTS - Places other than private residences in which exposed food is held, processed, prepared or served. **FOOD AREAS-APPLICATIONS LIMITED TO CRACK AND CREVICE TREATMENT ONLY.** Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing) preparing edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation would be considered a food area). Apply in small amounts directly into cracks and crevices using equipment capable of delivering a pin stream of insecticide in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where ants, cockroaches, silverfish or waterbugs hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

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, garages, mop closets and storage (after canning or bottling). Apply to baseboard areas, around water pipes, surfaces behind and beneath sinks, lockers, tables, pallets and similar areas where insects hide or through which they may enter.

PRECAUTIONARY STATEMENTS

HAZARUS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing the spray mist. Provide adequate ventilation of the area being sprayed. Contact with skin, eyes and clothing should be avoided. Wash thoroughly after using. Avoid contamination of food, utensils and food preparation areas. Should poisoning occur, get prompt medical attention.

PHYSICAL OR CHEMICAL HAZARD

~~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. Do not spray on plastics or asphalt tile, or anything that may be affected by petroleum distillates. Do not use this product in or on electrical equipment due to the possibility of shock hazard.~~

NOTE TO PHYSICIAN: Atropine sulfate is antidotal.

BEST AVAILABLE COPY

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting; get prompt medical attention.

IF INHALED: Move the person to fresh air and treat symptomatically.

IF ON SKIN: Wash with soap thoroughly. If skin irritation persists, see a physician.

IF IN EYES: Flush with water for fifteen minutes, then see a physician immediately.

EPA Est. No. 4140
CA-1 IN-1 NJ-1 PR-1 TX-1

9M205⁸⁸

