9/4/2003



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES 15

Mr. William Ayer Cessco, Inc.. 3609-A River Road Johns Island, SC 29455

SEP - 4 2003

Dear Mr. Ayer:

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Subject: Amendment - Response to PR Notice 2001-1 A.C. Southern Spray-Tox Insecticide EPA Registration Number 6959-33 Your submission dated June 3, 2003

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable and a stamped copy of the label is enclosed for your records. When preparing the actual finished label the following revisions should be incorporated:

- a. Since the product contains petroleum distillates please replace "Have person sip a glass of water if able to swallow." with "Do not give any liquid to the person." in the If Swallowed section of the First Aid directions.
- b. In the Ingredients Statement on the front panel, add the heading ACTIVE INGREDIENTS above "Pyrethrins".

Sincerely,

Linda Arrington Acting Product Manager 10 Insecticide Branch Registration Division (7505C)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMAN & DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Wash thoroughly with soap and water after handling. Avoid breathing vapors or spray mist. Avoid contact with clothing, eyes and skin. Remove contaminated clothing and wash clothing before reuse.

Remove pets, birds, and cover fish aquariums before spraying.

FIRST AID

- If Swallowed: Call a Poison Control Center or doctor ٠ immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor.
- If Inhaled: Move victim to fresh air. If person is not breathing, . call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
- If In Eyes: Hold eye open and rinse slowly and gently with . water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center or doctor for further treatment advice.
- If on Skin or Clothing: Take off contaminated clothing. Rinse ٠ skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
- Have the product container or label with you when calling a . poison control center or doctor or going for treatment.

PHYSICAL OR CHEMICAL HAZARDS

Store containers upright. Do not use or store near heat or open flame. Avoid exposure to extreme temperatures. Do not apply this product in or on electrical equipment due to the possibility of a shock hazards.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional office of the EPA.

STORAGE AND DISPOSAL

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.

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 approved State or local procedures.

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

CESSCO A.C. SOUTHERN SPRAY-TOX INSECTICIDE

SPRAY-TOX is an effective ready-to-use Pyrethrin insecticide, for application in specialized mechanical, thermal, or compressed air fogging equipment that can be adjusted to deliver a true aerosol mist.

SPRAY-TOX is designed for use in bakeries, food plants, restaurants, hotels, motels, hospitals, schools, office buildings, warehouses, daines, milk rooms, horse barns, meat packing plants, boats, flour mills, food processing & handling plants, and food storage warehouses.

Pyrethrins	0.30%
*Piperonyl Butoxide, Technical	
**INERT INGREDIENTS	
	100.00%

* Equivalent to 1.20% (butylcarbityl) (6-propylgiperonyl) ether and .30% related compounds. ** Contains Petroleum Distillate, Xylene, or Xylene range aromatic solvent.

KEEP OUT OF REACH OF CHILDREN CAUTION SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

E.P.A. Est. No. 6959-SC-1 E.P.A. Reg. No. 6959-33

NET CONTENTS: 5 GALLONS

MANUFACTURED BY:

ACCEPTED. CESSCO, INC. with COLLEGE TS. 3609-A River Road in EPA Letter Dated Johns Island, SC 29455

1-800-476-3666/

SEP 4 2003

Under the Federal Insecticide. Fungleide, and Bedenticide Act as amended, for the peopletic registered under EFA Book Mas

6959.33

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

This ready-to-use concentrate may be dispersed through good mechanical. thermal or compressed air logging or spraying equipment. If used in edible product areas of Ferierally inspected meat poultry, shell egg grading and ead product establishments, it must be dispursed as an and spray (no droplets over 50 mic. on: In diameter and 84% less than 30 microns),

SPACE TREATMENT FOR FLYING INSECTS:

House flies, Stable Flies, Blow Flies, Fruit Flies and Gnats. Close all doors and windows and shut off ventilating systems. Apply as fog or fine mist at a rate of 1 ounce per 1000 cubit fret of space. Direct spray towards ceiling in all directions and behind obstructions. Lo nut rumain in treated area. Keep area closed for at least 15 minutes and ventilete refore reoccupying. Repeat treatment as necessary.

FOR CRAWLING INSECTS:

Roaches and Silverfish. Spray infested areas thoroughly directing spray into hiding places such as cracks and crevices, cabinets, under sinks, etc. Spray directly on as many insects as possible. Repeat treatments as necessary.

FOR GRAIN INSECTS:

For control of accessible stages of Flour Beetles, Cadelles, Saw Tooth Grain Beetles, Bran Bugs, Indian Meal Moths, Mediterranean Flour Moths, Chocolate Moths, Angoumols Grain Moths, Foreign Grain Beetles, Cigarette Beetles, and Ham & Cheese Mites.

FOR CLOTHES MOTHS AND CARPET BEETLES:

Clean and spray closets thoroughly to reach all hiding places. Clean and brush woolen articles. Repeat application every 30 days. When carpets are infested, spray both sides thoroughly. When spraying near fabrics, keep spray in constant motion, at least 36 inches away from fabrics. Spraving closer may cause stains.

FOR BEDBUGS:

Spray baseboards, molding and floor boards. Spray mattrasses and box springs. It will be necessary to dismantle the bed completely, thoroughly spraying each part, including mattress and box springs. All baseboards and wall cracks about the bedroom should be thoroughly treated. Repeated applications and direct contact of the pest with spray are necessary for control.

FOR MOSQUITOES:

Close all doors and windows and shut off ventilating systems. Spray upwards into the air, filling premises with a mist at a rate of 1 ounce per 1000 cubic feet. Do not remain in treated area. Keep area closed for at least 15 minutes and ventilate before reoccupying.

IN HOSPITALS:

Patients should be removed from room prior to treatment. Room should be ventilated for two hours after spraying. Do not return patient to room until after ventilation.

FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS:

When applying space treatment in food handling areas, the food handling operation should be shut down. Foods should be removed or covered during treatment. In food processing areas all utensils, shelving, etc., where food will be handled should be covered or removed before treatment or thoroughly washed with an effective clearing compound followed by a potable water rinse prior to use. Careful crack and crevice application for inspection purposes is permissible at all times except in USDA Federally inspected meat and poultry plants, as provided below.

In Authorized USDA Federally Inspected Meat and Poultry Plants: Apply only when processing area is not in operation. Foods should be removed or covered during treatment. After a space treatment, all food processing surfaces and equipment should be thoroughly washed with an effective cleaning compound followed by a potable water rinse prior to use. To prevent food contamination, the treated area should be free of odor before the food product is placed in the area.

ZOECON 9307 PET SPRAY

Alternate Brand Name: ZODIAC® Flea & Tick Repellent for Puppies

For dogs, pupples, cats kittens, horses, ponies

Kills fleas

Egg stop formula Kills fleas [dead] plus their hatching eggs [for up to 28 days][on your dog] Kills flea eggs [before they hatch] Kills eggs for up to 28 days [Effectively] breaks the flea life cycle Keeps [Working to keep] flea eggs from hatching for 28 days [4 weeks][1 month] [with][Contains][PRECOR®][vIGRen@] Insect Growth Regulator] plus pyrethrins, an adulticide [Controls] Kills [and repels] fleas [and ticks][including those that may carry Lyme disease][on dogs] Kills and Repels: Fleas, ticks, lice, flies, mosquitoes [including those which may transmit West Nile virus] and gnats Kills adult and pre-adult fleas (eggs) [Step 1 - On Pet] Prevents hatching fleas from becoming full grown [fleas] No need to pump, sprays in any position, even upside down One treatment works for 28 days [4 weeks][1 month] to keep flea eggs from hatching Reduces bot infestation by killing botfly eggs Prevents botfly eggs from hatching Botfly eggs and flea eggs sprayed with [Zoecon 9307] will not hatch into adults [RF 9610] cosmetic-grade solvent formulation] [Rapid action][quick acting][fast acting] formula Quickly kills [repels] [expels] adult fleas plus kills their hatching eggs for up to 28 days [4 weeks][1 month] on your dog [puppy, cat, kitten, horse, pony] Strong flea repellent action that you can see One [single] treatment works for 28 days [4 weeks][1 month] to keep flea eggs from hatching Kills flea eggs for 28 days to prevent reinfestation Provides 28 days [4 weeks][1 month] protection against fleas 28 days [4 weeks][1 month] protection Protects for 28 days [4 weeks][1 month] Stops flea egg development, preventing further infestations for up to 28 days [4 weeks][1 month] Rapidly rids your animal of pesky biting fleas and ticks for up to 28 days [4 weeks][1 month] Kills fleas and ticks for up to 28 days [4 weeks][1 month] reducing itching and scratching Pleasant [name of scent] scent [Front or back panel] **ACTIVE INGREDIENTS:** N-octyl bicycloheptene dicarboximide (CAS #113-48-4)...... 0.62% OTHER INGREDIENTS: <u>98.71%</u> Total 100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for additional Precautionary Statements

EPA Reg. No. 2724-462 Net Contents:

	RCCEPE EPA Est. No.
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READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON [DOGS][PUPPIES][CATS][KITTENS][HORSES][PONIES]

HOW ZOECON 9307 WORKS:

[Zoecon 9307 combines the adult flea killing power of pyrethrins with the long-lasting egg-killing power of PRECOR® [vIGRen®] Insect Growth Regulator. This highly effective combination of ingredients provides quick relief from biting fleas and continuous killing of flea eggs laid on the animal, breaking the flea life cycle. The elimination of both adult fleas and flea eggs is important because adult fleas live on your pet, causing discomfort and skin irritation, while the vast number of eggs that they lay fall off and develop in your house. If fleas are already developing in your house, then {premise product} and {yard product} should also be used. Effective flea control requires treatment of your pets, house, and yard.]

[Zoecon 9307 contains PRECOR® [**vIGR**en®] Insect Growth Regulator which effectively kills botfly eggs that have been glued to the hairs on the forelegs, shoulders, and faces of horses by adult botflies (*Gastrophilus* spp.). If left untreated, botfly larvae emerge from these eggs and are taken into the mouth of the horse. After botfly larvae are swallowed they attach to the stomach and small intestinal linings in tremendous numbers where they can remain for months before passing out in the feces. Adult botflies emerge from pupae in the soil to begin the cycle all over again. Botflies have been implicated as a cause of some stomach and intestinal conditions in horses.]

DIRECTIONS FOR USE - It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

SHAKE WELL BEFORE USING.

FOR DOGS/CATS:

For Fleas, Lice, and Flea Eggs: A light, even coverage of the hair coat will provide effective flea control. Do not allow spray from application or damp animal to come into contact with painted or finished surfaces, including wood floors/furniture, leather/vinyl materials, or other surfaces of concern. For best penetration [results], ruffle the coat while spraying against the natural lay of the hair. Cover animal's eyes with hand and [with a firm, fast stroke,] spray head, ears, and chest. With cloth, rub into face around mouth, nose, and eyes. Then spray the neck, middle, and hindquarters, finishing with legs last. Avoid spraying rectum and genitals. For larger dogs, spray until damp not saturated. Do not allow animals, cats in particular, to become chilled. Apply at the rate of [1 to 2 squeezes of the trigger sprayer][1 to 2 seconds of spray][0.1 ounce] per pound of body weight. Repeat every month for continuous home flea infestation prevention. For continuous protection against adult fleas, or if your pet becomes reinfested with adult fleas from outside sources, reapply [Brand name] once weekly.

For Ticks: Apply as directed for fleas, but make sure spray thoroughly wets ticks. For continuous protection against ticks, reapply (Brand name) once weekly.

For Mosquitoes: Apply as directed for fleas. For continuous protection against mosquitoes, reapply {Brand name] once weekly.

FOR PUPPIES/KITTENS:

For Fleas, Lice, and Flea Eggs A light, even coverage of the hair coat will provide effective flea control. Do not allow spray from application or damp animal to come into contact with painted or finished surfaces, including wood floors/furniture, leather/vinyl materials, or other surfaces of concern. Leaving the eyes, nose, and mouth exposed, treat puppies/kittens weighing less than 3 lbs. by wrapping the animal in a towel which has been lightly sprayed with [Brand name]. Keep the animal wrapped for 5 to 10 minutes. Or lightly spray a brush or cotton ball and work thoroughly into the hair coat. Adult fleas may then be removed from the coat by picking or combing. Puppies/kittens over 3 lbs. may be treated the same as dogs/cats with [1 to 2 squeezes of the trigger sprayer][1 to 2 seconds of spray][0.1 ounce] per pound of body weight. Reapply every 28 days [1 month], for continuous home flea infestation prevention. For continuous protection against adult fleas, or if your pet becomes reinfested with adult fleas from outside sources, reappy [Brand name] once weekly. Do not allow animal to become chilled. Do not use on puppies/kittens under 12 weeks of age.

[FOR HORSES AND PONIES:]

[For Mosquitoes, Flies, Gnats and Botfly Eggs: Remove excess dirt and dust by brushing the coat. Apply the spray once weekly directly to the horse's/pony's coat, paying particular attention to the legs, shoulders, flanks, neck and topline. Spray to the point of dampness, but not to the point of runoff. To treat the face, dampen a cloth with the spray and rub on the face and head, being careful to avoid the eyes. For a high degree of mosquito, fly, gnat, and botfly egg control, spray animals every 3 to 5 days. Do not use on horses destined for slaughter.]

STORAGE and DISPOSAL: Storage: Do not store near heat or open flame. Store away from children and animals. **Disposal:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If **partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. May cause skin sensitization in rare cases with repeated use. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing or medicated animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID	
Call a poison control center or doctor immediately for treatment advice.	
If on skin or	Take off contaminated clothing.
clothing	 Rinse skin immediately with plenty of water for 15-20 minutes.
If in eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	 Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

doctor, or going for treatment. You may also contact 1-800-[phone number] for emergency medical treatment information.

[Note: First Aid statement paragraph format may be used if space is limited.]

PHYSICAL HAZARDS:. Combustible. Do not use or store near heat or open flame.

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

[Satisfaction Guarantee]

[If not completely satisfied with this product, return it to place of purchase with your receipt for a full refund.] 100% satisfaction guaranteed. In case of emergency or for product use information, call [phone number] or visit our Web site: [URL].

For [more] information [about Brand name products] or in case of emergency, call 1-XXX-XXX-XXXX [weekdays from][time].

PRECOR® and vIGRen® Insect Growth Regulator, and ZODIAC® are registered trademarks of Wellmark International.

Wellmark International Schaumburg, Illinois 60173 Made in USA