

Mr. William Ayer
Cessco, Inc.
5609A River Road
Johns Island, SC 29455

FEB 03 1998

Subject: Amendment to change inert ingredients to provide a non-flammable formulation and subsequent clarification letter dated November 27, 1997.
Cessco Accudose Insecticide Aerosol
EPA File Symbol 6959-82
Original Application Submission Date: September 24, 1997

Dear Mr. Ayer

The Agency has completed reviewing the amendment and subsequent information submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. The information provided to the Agency is acceptable with the following conditions as outlined in 40 CFR Part 152-Pesticide Registration and Classification Procedures Subpart C - Registration Procedures, .43 Alternate formulations:

- (a) A product proposed for registration must have a single, defined composition, except that EPA may approve a basic formulation and one or more alternate formulations for a single product.
- (b) An alternate formulation must meet the criteria listed in paragraph (b)(1) through (4) of this section. The Agency may require the submission of data to determine whether the criteria have been met.
 - (1) The alternate formulation must have the same certified limits for each active ingredient as the basic formulation.
 - (2) If the alternate formulation contains an inert ingredient or impurity of toxicological significance, the formulation must have the same upper certified limit for that substance as the basic formulation.
 - (3) The label text of the alternate formulation product must be identical to that of the basic formulation.
 - (4) The analytical method required under 158.180 must be suitable for use on both the basic formulation and the alternate formulation.
- (c) Notwithstanding the criteria in this section, the Agency may determine that an alternate formulation must be separately registered. If EPA makes this determination, the Agency will notify the applicant of its determination and its reasons. Thereafter the application for an alternate formulation will be treated as an application for new registration, and the alternate formulation will be assigned a new registration number."

| CONCURRENCES | | | | | | | |
|--------------|-------------------|--|--|--|--|--|--|
| SYMBOL ▶ | H7505C | | | | | | |
| SURNAME ▶ | <i>R. G. B...</i> | | | | | | |
| DATE ▶ | Feb 3, 1998 | | | | | | |

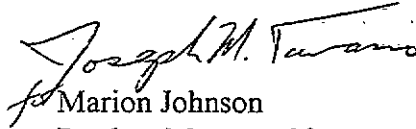
20/3

Page # 2
Registration # 6959-82

1. The alternate CSF submitted to the Agency by letter on November 27, 1997 must be accepted as the Basic Formulation. This formulation will supersede any other basic or alternate formulations submitted to the Agency prior to November 27, 1997 for registration number 6959-82. Subsequent CSF submittals must have a single, defined composition, or the application for an alternate formulation will be treated as an application for new registration.

A stamped copy of the acceptable label is enclosed for your records. If you have any questions or comments, please contact Richard J. Gebken at (703) 305-6701.

Sincerely,



for Marion Johnson
Product Manager 10
Insecticide Branch
Registration Division (7505C)

enclosure

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

CAUTION

Harmful if swallowed. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. In case of contact immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. Cover or remove food before treatment. All food processing surfaces should be covered during treatment or thoroughly washed and cleaned before using. Do not apply when food processing is in operation. Remove pets, birds, and cover fish aquariums before spraying.

STATEMENT OF PRACTICAL TREATMENTS

- If Swallowed: Call a physician or Poison Control Center. Do not induce vomiting because of aspiration pneumonia hazard.
- If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.
- If In Eyes: Flush with plenty of water. If irritation persists get medical attention.
- If on Skin or Clothing: Remove contaminated clothing. Wash skin with soap and warm water. Get medical attention if irritation persists.

PHYSICAL OR CHEMICAL HAZARDS

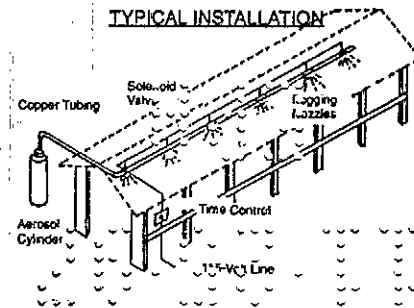
Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperature above 130° F may cause bursting.

STORAGE AND DISPOSAL

Storage: Do not store near heat or open flame. Do not store at temperatures above 130 F.

DISPOSAL: DO NOT ATTEMPT TO REFILL CYLINDER. The cylinder is refillable only by Manufacturer. When empty, close valves, replace safety cap, and return cylinder to manufacturer or distributor.

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



**ACCUDOSE
AEROSOL INSECTICIDE**

PAT. NO. 3,614,841. OTHER PATENTS PENDING

To be used only with
Cessco's Accudose
Insecticide Aerosol Piping System
with Automatic Timer.

**FOR CONTROL OF
FLYING INSECTS**

INGREDIENTS

ACTIVE INGREDIENTS:

| | |
|-----------------------------------|--------|
| Pyrethrins..... | 0.70% |
| *PiperonylButoxide Technical..... | 3.50% |
| **OTHER INGREDIENTS..... | 95.80% |

* Equivalent to 4.00% (butylcarbityl)(6-pro-pylpiperonyl) ether and 1.00% related compounds.

**Contains Petroleum Distillates

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

EPA. EST. #6959-SC-1

EPA. REG. #6959-82

MANUFACTURED BY:

Cessco, Inc.

3609 A RIVER ROAD
JOHNS ISLAND, SC 29455

1-800-476-3666

NET WEIGHT-100 LB.

ACCEPTED
with COMMENTS
to EPA Letter Dated

FEB 03 1998

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

6959-82

DIRECTIONS FOR USE

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

Flies, Horseflies, Deer Flies, Black Flies, Mosquitoes, Gnats, Sandflies, Midges, Wasps, and Small Flying Moths in horsebarns, milking parlors, hog parlors, farrowing pens and holding pens for horses, cows or hogs: Calculate total cubic feet to be treated. Set timer to spray at a rate of 1 second per 1000 cubic feet per nozzle tip. Treatments can be made when animals are present. To avoid contamination, do not place a nozzle within 36 inches of food, water, or animal. Dosage may have to be doubled for open barns or holding pens. Repeat treatments as necessary. Optimum results are obtained when daily applications are made.

Out of Doors: For temporary protection around pools, decks, and terraces. Vacate the area prior to treatment. Do not use when people or domestic animals are present. Allow area to ventilate 15 minutes before reentry. Set timer to spray 10-15 seconds per treatment depending on wind drift. Repeated treatments may be necessary. Nozzle tips should be directed away from ornamental shrubbery, pools, and any surface or object that is susceptible to staining.

Flies, Gnats, Fruit Flies, Wasps, Small Flying Moths, Accessible stages of Yellow Mealworms, Indian Meal Moths (Chocolate Moths), Angoumois Grain Moths, Almond Moths, Foreign Grain Beetles, Cigarette Beetles, Saw-toothed Grain Beetles, Confused Flour Beetles, and Rice Weevils in food processing plants, canneries, and food storage warehouses and plants containing non-perishable packaged, bagged raw, or processed food commodities, as well as bulk grains and animal feed. Processed foods include flour, sugar, cereals, packaged cookies and crackers. Raw commodities include bagged or bulk field dried beans and peas, cocoa beans, nuts grains, and sweet potatoes: Calculate total cubic feet to be treated. Close all doors and windows. Set timer to spray at a rate of 1 second per 1000 cubic feet per nozzle tip. Do not treat when food processing is in operation. All food processing surfaces should be covered or thoroughly washed and cleaned before using. Do not remain in treated area. Ventilate area when treatment is completed. Sweep up and destroy fallen insects. Repeat treatments as necessary. Optimum results are obtained when daily treatments are made. The insecticide does not penetrate bagged or packaged containers and infested products should be treated by other effective and approved methods.

Flies and other Flying Insects in chicken houses and caged laying houses: Treatment should not be made more often than twice daily. Calculate total cubic feet to be treated. Set timer to spray at a rate of 1 second per 1000 cubic feet per nozzle tip. To avoid contamination, do not place a nozzle within 36 inches of food, water, or fowl. Optimum results are obtained when daily treatments are made.

3/2/98