UNITED ATES ENVIRONMENTAL PROTECTION DENCY

MAR 2 4 1994

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Mr. Larry J. Spears CSA Limited Inc. 16212 State Highway 249 Houston, TX 77086

Dear Mr. Spears:

Subject: Amendment - Revised Labeling - Alternate Confidential Statement of Formula CSA WB Total Release Fogger #1 EPA Registration No. 7056-162 CSA Insect Spray formula Number Six EPA Registration No. 7056-169 Your Submissions Dated November 16 and December 28, 1993

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. For EPA Reg. No. 7056-162, add the following statements under the Directions for Use:

Do not use this unit in a cabinet or under a counter or table. Do not use this unit in an area less than 100 cubic feet.

Submit five copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

The alternate Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is not acceptable. Please provide the chemical identity of all components, Material Safety Data Sheets, CAS Registry Numbers and the percentage or range in percentage in the mixture for the fragrance Lemon Fragrance #295-7. Please note that the certified limits but be the same for the basic and alternate formulations. Refer to the last accepted basic CSF and revise accordingly.

	CONCURRENCES	
SYMBOL A		
SURNAME		
DATE 32-344		
EPA Form 1320-1A (1/90)	Printed on Recycled Paper	OFFICIAL FILE COPY

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With regards to the CSF for EPA Reg. No. 7056-169, although the nominal concentration on the CSF agrees with the label claim, the CSF should be revised by splitting 0.050% for d-cis/trans Allethrin under column 13b as follows: d-cis/trans Allethrin 0.048% and Other Isomers 0.002%. The certified limits should be specified for each under column 14a and 14b.

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Sincerely yours,

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

CSA INSECT SPRAY FORMULA NUMBER SIX

Pressurized Spray - Residually kills Ants, Cockroaches, Ticks, Fleas, and other listed insects.

For Use in Homes and Non-Food Areas of Commercial Buildings, Warehouses, Theaters, Office Buildings, Schools, Motels, Hotels, Restaurants, Food Processing Facilities, and Kennels

New Patent Pending Water-Based Technology Fresh, Clean Scent

ACTIVE INGREDIENTS:

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d-cis, trans Allethrin (allyl homolog of

Cinerin I)	0.048%
Other isomers	0.002%
N-Octyl bicycloheptene dicarboximide	0.251%
*Cyano (3-phenoxyphenyl) methyl 4-chloro-	
alpha-(1-methylethyl) benzeneacetate	0.200%
INERT INGREDIENTS	<u>99.499%</u>

*Licensed under U.S. Patent No. 4,062,968 of Sumitomo Chemical Company.

KEEP OUT OF REACH OF CHILDREN CAUTION Read carefully other cautions on the back panel.

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN	Remove contaminated clothing. Wash skin
OR CLOTHING:	with soap and water. Get medical attention if irritation persists.
IF SWALLOWED:	Call a physician or poison control center.
IF IN EYES:	Flush with plenty of water. Get medical attention if irritation persists.
IF INHALED:	Remove affected person to fresh air.
	Call a physician if adverse reactions
	occur.

Net Weight: 15 oz. (425g)

Manufactured by: IQ PRODUCTS COMPANY HOUSTON, TEXAS 77086

EPA REG. NO. 7056-169

EPA EST. NO. 7056-TX-1

100.000%

PREC/ HAZARDS TO I

ONARY STATEMENTS ANS AND DOMESTIC ANIMALS CAUTION

May be harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing spray mist and provide adequate ventilation of area being treated. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap and water after handling.

Do not use in food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Non-food areas are areas such as garbage rooms, lavatories, floor drains (to sewer entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling). 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. Not for use in USDA Meet and Poultry Plants.

In the home, cover all food preparation surfaces and cover or remove all food and cooking utensils, or wesh thoroughly after treatment. Remove pets, birds, and cover fish aquariums before spraying. Do not allow children or pets to contact treated surfaces until spray has dried.

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 temperatures above 130°F may cause container to burst. Do not apply this water-based product in conduits, motor housings, junction and switch boxes, or other electrical equipment because of possible shock hazards. Do not use on surfaces that may be damaged by water.

DIRECTIONS FOR USE It is a violation of federal law to use this product in a menner inconsistent with its labeling. READ ALL DIRECTIONS BEFORE USING THIS PRODUCT. SHAKE CONTAINER WELL BEFORE USE. HOLD CONTAINER UPRIGHT DURING USE.

TO KILL ANTS, COCKROACHES, CRICKETS, SILVERFISH, SPIDERS, SOWBUGS, AND CARPET BEETLES: Spray areas where these pests are found or may hide, including dark corners of roome and closets; cracks and crevices in walls; slong baseboards and door and window 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. FOR ANTS: Also apply to ant trails, around doors and windows, and wherever these pests may find entrance. Repeat as necessary.

TO KILL BROWN DOG TICKS AND FLEAS: Thoroughly apply as a spot treatment to infested areas such as pet beds and resting quarters; neurby cracks and crevices; along and behind beseboards, window and door frames; and floor coverings where these pests may be present. Old bedding should be removed and laundered or replaced with clean, fresh bedding after treatment. <u>Do Not Spray Pets With This Product</u>. Repeat as necessary.

FLIES AND MOSQUITOES: Use only outdoors as an aid in reducing annoyance from these insects. Spray outside surfaces of window frames and door frames as well as other areas where these pests may enter the home. Also spray dark corners and localized resting areas, such as under eaves, on porcher, potios, and in garagee where these insects may congregate. Flies and mosquitoes landing on treated surface will be killed. Repect as necessary.

STORAGE AND CISPOSAL

Storage: Keep in locked storage area, Store in a port dry, place, away from heat, sparks, and open flame. Do not store at temperatures over 130°F.

Disposal: Do not reuse empty container, Replace ban and discard in accordance with all logal, state, and federal laws and regulations. Reduce pollution at its source.



