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MAY 1 0 1991

Mr. Neil Axelford Zoe Chemical Co., Inc. 1801 Falmouth Avenue New York, NY 11040

Dear Mr. Axelford:

Subject: Confidential Statement of Formula and Product Chemistry Data (Submitted in conjunction with request for revised labeling) Meadows Total Release Fogger Insecticide EPA Reg. No. 7885-47 Submission dated June 20, 1988 (Duplicate submitted October 5, 1990)

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

The density (8.49 lbs./gal) of the product, depicted on the Confidential Statement of Formula dated June 20, 1988, is inconsistent with that described in the Product Chemistry data matrix (9.73 lbs./gal). Please clarify this inconsistency.

Submit the data upon which the claim --Flash Point/Flame Extension equals 150 degrees Fahrenheit/ 16 inches-- is based.

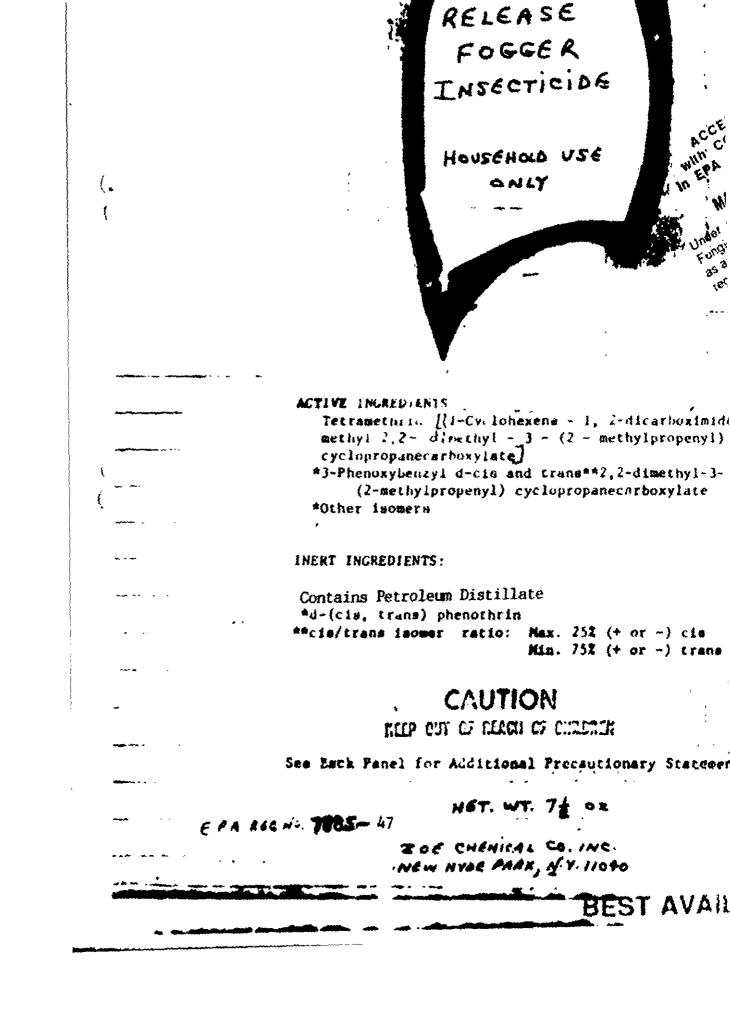
It is understood that deodorized kerosene was deleted from the formulation in the Confidential Statement of Formula dated August 25, 1987 that was conditionally accepted by the Agency in its letter dated June 6, 1988.

The label declaration for sumithrin should be revised to read: "3-phenoxybenzyl-(1RS, 3RS; 1RS, 3SR)-2,2-dimethyl-3-(2-methylprop-1-enyl)cyclopropanecarboxylate".

Delete "general classification" from the Directions for Use paragraph, since the use of this pesticide is not classified.

Sincerely,

Richard F. Mountfort Product Manager (10) Insecticide-Rodenticide Branch Registration Division (H7505C)



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Precentionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Marmful if swallowed. Avoid inhalation of vapors. Avoid contact with skin, eyes or clothing. Wash contaminated skin promptly with soap and warm water. For eyes, flush with plenty of water. Get medical attention if irritation persists. Avoid contamination of food and feedstuffs.

Do not use in commercial food processing, preparation, serving or storage areas. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Cover exposed food.

Remove pets, birds and cover fish aquariums before spraying.

Physical 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.

Directions for Use

General Classification

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

Storage and Disposal

Storago: Store in a cool, dry area away from heat or open flame.

Disposal: Do not re-use empty container. Wrap container and put in trash collection.

This product will kill Flies, Mosquitos, Black Carpet Beetles, Saw-toothed Grain Beetles, Rice Weevils, Small Flying Moths, Spiders, Centipedes, Fleas, Ticks, Wasps, Pill Bugs, Crickets and Silverfish.

Aids in control of Cockroaches and watereves

Cover exposed food, dishes and food-handling equipment. Open cabinets and doors to area to be treated. Shut off fans and air conditioners. Put out all flames and pilot lights. Close doors and windows. Point valve opening away from face and eyes when releasing. Use one unit for each 6,000 cubic feet of unobstructed area. Do not remain in the area during treatment and ventilate thoroughly before re-entry.

TO OPERATE VALVE: To lock value in open position for automatic discharge, press value button all the way down, hooking the catch. Then place togher on stand or table in center of room with value locked open, placing reveral layers of newspaper or pad under fogger. Leave building at once and keep building closed for four hours before airing out. Open all doors and windows and allow to air for 30 minutes. Repeat spraying in two weeks or when necessary.

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