

8536-31

02/12/2007

1/5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 12 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Mardel Belotinsky
Cardinal Professional Products
P.O. Box 782
Hollister, CA 95024-0782

Dear Ms. Belotinsky,
Subject: Premium Grade Card-O-Sect #25
EPA Reg. No. 8536-31
Submission dated 9/21/06

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

The product name Premium Grade must be qualified so that it is not a heightened efficacy claim as follows:
Premium Grade brand

Add a "Note to Physician" at the end of the First Aid Statements. Include in the Note to Physician the following:
Contains petroleum distillate – vomiting may cause aspiration pneumonia.

As this product is a liquid, the Net Contents must be expressed in fluid measures (gallons, fluid ounces, etc) not by weight.

Revise the precautionary statement about applying to food to read as follows:
Do not apply to food or feed.

For containers greater than 5 gal., the Environmental Hazards Statement must read as follows:

This pesticide is toxic to fish, aquatic invertebrates and oysters/shrimp. 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 Pollution 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.

The Physical and Chemical Hazards Statements must read exactly as follows:
Combustible. Do not use or store near heat or open flame.

Add to the Directions for Use the following:

For Indoor Use Only. This product may be used in institutions, food and non-food areas of food handling establishments, and residential areas. Do not use in indoor metered spray systems. Do not use in automatic misting systems.

Add to the Directions for Use a section with the heading "Use in Food Handling Establishments" and move directions and restrictions related to this use under this heading.

Revise the statement about washing facilities and equipment to read as follows:

All surfaces, equipment and utensils where food is handled must be washed with an effective cleaning compound followed by a potable water rinse after spraying and prior to use.

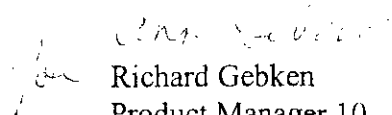
For products applied as space spray, add the following:

Close doors, windows and shut off all ventilation equipment before application.

In the directions for use, replace the word "caution" with "attention", as "caution" is a signal word.

Note that a Notice of Available of EPA's reregistration eligibility document (RED) for products containing resmethrin was published in the Federal Register on July 26, 2006. Additional data and/or labeling changes may be required for products containing resmethrin. A copy of the RED is available at the following website: http://www.epa.gov/oppsrrd1/REDs/resmethrin_red.pdf. If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

Premium Grade Card-O-Sect # 25

ACTIVE INGREDIENT:
 Resmethrin0.5%
 OTHER INGREDIENTS*.....99.5%
 TOTAL:100.0%

*Contains petroleum distillates.

ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 2/12/2007

registered under EPA Reg. No.
 8536-31

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

If swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • 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. • Call a poison control center or doctor for treatment advice.

EMERGENCY PHONE NUMBER: **Infotrac: 1-800-535-5053**

NOTE: Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.



Cardinal Professional Products

P. O. Box 782
 Hollister, CA 95024-0782

EPA Reg. No. 8536-31

EPA Est. 48498-CA-1

NET CONTENTS.....LBS.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
AND DOMESTIC ANIMALS:
CAUTION**

- Harmful if swallowed.
- Avoid breathing vapor.
- Avoid contact with skin, eyes or clothing.
- Wear protective clothing.
- Wash exposed skin with soap and water after handling and before eating.
- Wash all contaminated clothing with soap and water separately from other clothing before reuse.
- Do not apply directly to processed food.
- In commercial food handling facilities, processed food and processing equipment should be covered or removed during application.
- Do not apply as a space spray while food processing is underway.
- Facilities and equipment in federally inspected meat and poultry plants must be washed with an effective cleaning compound and rinsed with potable water after spraying.
- In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use.
- Remove pet birds, and cover fish aquariums before spraying.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS

This formulation is combustible. Extinguish open flame before space spraying. **DO NOT USE, POUR, SPILL, OR STORE NEAR HEAT OR OPEN FLAME.**

DIRECTIONS FOR USE

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

- **SPACE SPRAYING:** Atomize with an Atomizer or Electric Sprayer. To kill Flies, Mosquitoes and Gnats, atomize one pint of CARD-O-SECT # 25 per 10,000 cubic feet of space. Keep doors and windows closed in order to obtain maximum results. Premises should be closed for at least ten minutes after spraying.
- **CONTACT SPRAYING:** Power Spray directly where possible on Roaches, Ants, Earwigs, Grain Mites, Spiders, Sow Bugs, Centipedes and Wasps. Spray with Hand or Electric Sprayer, or Compressed Air Spray Gun.
- **CAUTION:** Use this product as a space spray in food processing plants only when plant is not operating. Foods should be removed, or covered, and all processing surfaces should be covered or thoroughly cleaned before using. Do not remain in treated areas and ventilate the area after treatment is completed.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry area.

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.

WARRANTY

Seller warrants that this product conforms to the chemical description on its label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. Neither this warranty nor any other warranty of MERCHANTABILITY or FITNESS FOR A PARTICULAR PURPOSE, express or implied, extends to the use of this product in a manner contrary to its label.