

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 27 1988

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Ms. Janine Laurencot
 Hercon Laboratories Corporation
 A Subsidiary of Health-Chem Corporation
 200B Corporate Court
 Middlesex Business Center
 South Plainfield, NJ 07080

Dear Ms. Laurencot:

Subject: Amendment - Toxic Inert Warning Statement/Substitute
 Inert Ingredient
 Hercon Insectape Containing Diazinon
 EPA Registration No. 8730-7
 Your Application Dated October 12, 1987 and
 January 26, 1988

The labeling 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 listed below before you release the product for shipment bearing the amended labeling.

1. Revise active ingredient to read as follows:

"Diazinon [0,0-diethyl 0-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate..."

2. Delete "General Classification" from the labeling. Classification for products containing Diazinon will be determined after the products are reregistered.

Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

CONCURRENCES

SYMBOL	INITIALS	DATE	DATE	DATE	DATE	DATE	DATE

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With respect to the Confidential Statement of Formula (CSF) the lower certified limits for active ingredient in the CSF are not the same as the label claim. Lower certified limits must be identical to the claim. Please submit a corrected CSF.

Also we cannot approve your request to substitute barium-calcium-zinc liquid stabilizer for barium-cadmium-zinc liquid stabilizer at this time. We cannot locate the additional data that you say was submitted by Witco Corporation on December 15, 1987. Please have Witco Corporation resubmit this information and direct it to my attention. Note that I am the Product Manager for products containing Diazinon (not Mr. William Miller).

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division

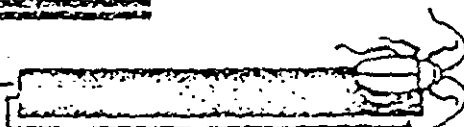
Enclosure

JUL 27 1966

Under the provisions of the Federal
Food, Drug, and Cosmetic Act and
as amended, this insecticide
registered under EPA Reg. No.

8730-7

HERCON



INSECTAPE®

CONTAINING DIAZINON

INSECTICIDAL STRIPS

KILLS ROACHES AND WATERBUGS UP TO SIX MONTHS
AND CLUSTER FLIES UP TO THREE MONTHS
CONTINUOUSLY WITH ONE APPLICATION

THE INSECTICIDE IS IN THE STRIP !
NO LINGERING ODORS AND MESS
OF SPRAYS OR POWDERS!

Active ingredient: 0,0-Diethyl 0-(2-isopropyl-6-methyl-4-pyrimidinyl) phosphorothioate*	10.0%
Inert ingredients	90.0%
	TOTAL 100.0%

*U.S. Patent No. 2,754,243.

THIS PRODUCT CONTAINS THE TOXIC
INGREDIENT, CADMIUM COMPOUND.

CONTENTS

36 1 in. x 4 in. adhesive strips
MINIMUM NET WEIGHT
1.33 oz.

CAUTION

KEEP OUT OF REACH OF CHILDREN

Read directions and cautions on back before use.

HERCON**INSECTAPE**
CONTAINING DIAZINON

KILLS ROACHES AND WATERBUGS
UP TO SIX MONTHS AND
CLUSTER FLIES UP TO THREE MONTHS
CONTINUOUSLY
WITH ONE APPLICATION

Hercon Insectape is a product designed to control cockroaches, waterbugs and cluster flies when placed where these insects crawl, hide or congregate. Insectape® is multilayered in such a way that the insecticide on its surface is replenished continuously whenever it is disturbed by washing, wiping or insect activity. With the Hercon® controlled release system, Insectape® provides protection without the lingering odor and mess of sprays or powders. Length of effectiveness may vary in different situations.

PRECAUTIONARY STATEMENTS

Do not open protective pouch until ready to use. Harmful if chewed or swallowed. Avoid contact with eyes, clothing and food. Wash hands with soap and water after handling. Do not use in edible product areas of food processing plants, restaurants or other areas where food is commercially prepared or processed. Note to Physician: Atropine is antidotal.

DIRECTIONS FOR USE GENERAL CLASSIFICATION

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

Wipe or clean surfaces before applying. To adhere, remove backing paper from strip. Do not place strips in exposed locations where direct contact with children, pets, food or clothing is likely to occur. In very large areas, apply strips as needed as an insufficient number may lead to unsatisfactory control. Depending on the degree of infestation, it may take from a few days to a few weeks before insect control is achieved. For best results, read enclosed booklet for additional directions.

Cockroaches and "waterbugs." Recommended strip placement sites are shown in the booklet. Place strips in warm, dark, out-of-sight locations. When treating a room, place strips in cracks, around pipes, in back of and under dishwashers, refrigerators, sinks and cabinets in the kitchen or bathroom or other dark areas where cockroaches hide. To avoid contact with children, apply strips to underside of overhang of cabinets, dishwasher or washing machine. If cockroach infestation is particularly severe, you may wish to continue the application of conventional sprays or dusts. A package of 36 strips is usually sufficient to treat an average-size kitchen or two other rooms (there are usually more hiding places for cockroaches in the kitchen). Replace strips after 6 months or when effectiveness diminishes.

Cluster flies (also known as attic flies or buckwheat flies): Place strips around windows and door frames. Keep out of reach of children. A package of 36 strips is sufficient to treat three average-size windows; refer to enclosed booklet illustration. Use more strips in severe infestations. Apply strips also in sites where flies are observed to congregate, including sliding glass doors, picture windows, attics, storage spaces, garages, wall spaces, behind pictures, under loose wallpaper and near unscreened louvers and ventilators. Replace strips after three months or when effectiveness diminishes.

WARRANTY

Manufacturer warrants that the product is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty of merchantability or fitness for a particular purpose, expressed or implied, extends to use of this product under abnormal conditions not reasonably foreseeable to manufacturer and user assumes the risk of any such use.

EPA Reg. No. 8730-7

EPA Est. No. 8730 PA 01

"HERCON" and "INSECTAPE" are registered trademarks
of HEALTH-CHEM CORPORATION

Hercon Division
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