

NOV 20 1995

Ms. Kelly Loft  
Realex  
Division of United Industries Corp.  
P.O. Box 15842  
St. Louis, MO 63114

Dear Ms. Loft:

Subject: Label Amendment/Alternate Confidential Statement of  
Formula  
Hot Shot Roach and Ant Killer  
EPA Registration Number 8845-122  
Your submissions dated May 1, 1995 and August 29, 1995

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:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. We assume you have efficacy data to support the fast acting claims and the residual claims for up to four weeks. If so the marketing claims "Kills fast", "Fast Killing", "Kills on contact", "Keeps on Killing", "Keeps on killing up to 4 weeks", "Protect up to 4 weeks" and "Continues to kill up to 4 weeks" are acceptable.

b. Under Precautionary Statements it says "Do not use in commercial food processing, preparation, food storage or serving areas." However on back panel you list use in non-food areas of commercial buildings, restaurants, and

food processing facilities. These statements are conflicting. Therefore limit sites to residential areas only and delete references to commercial sites or retain the commercial sites but revise the "Do not use paragraph xxx" as follows "Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. In the home xxx.

Non food/feed areas are areas of food/feed handling establishments such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, mop closets and storage areas (after canning or bottling).

The confidential statements of formula dated May 1, 1995 (alternate 4 and 5) and April 17, 1995 (alternate 3) have been reviewed and found acceptable.

Sincerely yours,

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

Enclosure

