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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, Rodenticide Act, as amended, is acceptable provided that you:

- 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.
- 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

ACCEPTED
with COMMENTS
in EPA Letter Dated



Roach and Ant Killer

Formula PRWB-1
Pressurized Insecticide Spray

Kills fast • Fast killing • Kills on contact • Keeps on killing • Keeps on killing up to 4 weeks • Protects up to 4 weeks • Continues to kill up to 4 weeks • Non-staining • No oily film • Water-based

Optional Phrases with Fragranced Formula: Fresh Floral / Scent / Perfume • Country Potpourri / Scent / Perfume • Floral Breeze / Scent / Perfume • Spring Fresh Scent • Country Orchard Scent • Orchard Fresh Scent

Activa Ingredients:	
Pyreihrins	0.05%
N-Octyl bicyctoheptene dicarboximida	
Permettinn [1(3-Phenoxyphenyl) methyl (+/-) cis-trans-3-(2,2-	
dichloroethenyl 2.2-dimethylcyclopropanecarboryiale]	0 20%
Related Compounds	0 02%
Inert Ingredients:	99 48%
fcis-trans isomer ratio. Min. 35% (+/-) cis, Max. 65% (+/-) trans	
Keep Out of Reach of Children	
CAUTION	
See Back for Additional Precautionary Statements	

Net Wt. 16 oz. (454 g)

Residually Kills: Roaches, Ants, Spiders, Crickets, Silverfish, Earwigs and other listed insects.

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

STOP. READ ENTIRE LABEL BEFORE USE Directions for Use

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

GENERAL: Use this residual spray as a spot or crack and crevice treatment to control cockroaches, waterbugs, silverfish, ticks, fleas and other insacts fisted below. Apply this product to localized areas where pests are found or may occur. Spray surfaces until wet. Repeat as needed. Gare should be taken to avoid depositing the product ento exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

FOR SPOT TREATMENT

To Xill Ants, Cockroaches, Crickets, Silverfish, Spiders, Sowbugs, Earwigs and Carpet Beetles: Spray areas where these pests are found or may hide, including dark corners of rooms and closets; cracks and crevices in walls; along 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, apply to ant trails, also around doors and windows and wherever else these pests may find entrance. Pepeat 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; nearby cracks and crevices; along and behind baseboards; window and door frames and localized areas of floor and floor coverings where these pests may be present. Old bedding should be removed and replaced with clean, fresh bedding after treatment. DO NOT SPRAY PETS WITH THIS PRODUCT. Pets should be treated with a registered product for flea and tick control in conjunction with this treatment.

Flies and Mosquitoes: Use only out-of-doors as an aid in reducing annoyance from these insects. Spray outside surfaces of window 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) or porches, patios and garages where these insects may congregate. Flies and mosquitoes coming to rest on treated surfaces will be killed. Repeat treatment when necessary.

FOR CRACKS AND CRI To Kill Ants, Cockroaches, C Brown Dog Ticks, Fleas, Earv

small amounts directly into crack
STORAGE AND DISPOS

heat and open flame. Pestici container in trash. Do not incine not reuse empty container. Se tayers of newspaper and discar

PRECAUTIONARY STATE Hazards to Humans and CAUTION: May be harmful it skin. Avoid breathing spray mis being treated. Avoid contact is contact immediately flush skin thoroughly with soap and water or drinking. Avoid contaminate occurs, get prompt medical aid. preparation, food storage or sering surfaces and utensits stathoroughly washed before use

Statement of Practical physician or Poison Control Ce water and induce vomiting by the induce vomiting or give any convulsing person. If in Eyes: attention if irritation persists. If I artificial respiration if needed. If and wash affected areas with so if irritation persists.

removed. Remova pets, birds a

Do not allow children or pets to

dried

Physical and Chemical not use or store near heat or o container. Exposure to tempera

NOTICE: Buyer assumes all accordance with directions.

Questions or comments? Ca Central Time.

Manufactured in the USA for Industries Corp., St. Louis, MO EPA Reg. No. 8845-122