

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

FFB 1 7 2004

OFFICE OF
PREVENTION, PESTICIDES AND
FOXIC SUBSTANCES

Kathie J. Tryson Spectrum Group, Division of United Industries Corp. P.O. Box 15842 St. Louis, MO 63114

Subject:

Label Amendment - Resubmission per PR Notice 2001-1

Hot Shot Roach and Ant Killer Formula PRWB-1

EPA Reg. No. 8845-122

Your Submission Dated December 12, 2003

Dear Ms. Tryson:

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Since MGK has identified a Tox Category III for eyes then the precautionary text must also be changed in accordance with PR Notice 2001-1. Therefore following the second statement under precautionary statements add, "Causes moderate eye irritation."

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703)305-7460.

Sincerely,

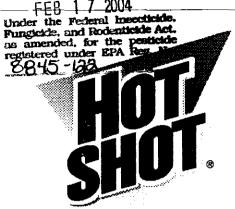
Débanda Weyander for George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

MIT COMMENTS IN EPA Letter Dated EER 1 7 2004



Roach and Ant Killer

Formula PRWB-1

Pressurized Insecticide Spray

Unscented • Non-staining • No oily film • Water-based

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

Active Ingredients:
Pyrethrins 0.05%
N-Octyl bicycloheptene dicarboximide 0.25%
Permethrin*
Related Compounds
Other Ingredients: 99.48%
Total
*cis/trans isomer ratio: Min. 35% (+/-) cis. Max. 65%(+/-) trans

Keep Out of Reach of Children
CAUTION See Back Panel for Additional Precautionary
Statements

NET WT. 16 OZ./453 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. Non-food/feed areas include areas such as (but not limited to) garbage rooms, lavatories, floor drains (to sewers) entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage areas (after canning or bottling).

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. Use this residual spray as a spot or crack and crevice treatment to control cockroaches, waterbugs, silverfish, ticks, fleas and other insects listed below. Apply this product to localized areas where pests are found or may occur. Spray surfaces until wet. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces. Do not use in commercial food processing, preparation, food storage or serving areas. In the home, all food processing surfaces and utensits should be covered during treatment, or thoroughly washed before use, Exposed food should be covered or removed Remove pets, birds and cover fish aquariums before spraying. Do not allow children or pets to contact treated surfaces until spray has dried.

FOR SPOT TREATMENT

To kill 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 trail, also around doors and windows and wherever else these pests may find entrance.

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.

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.

FOR CRACKS AND CREVICES

To kill Ants, Cockroaches, Crickets, Silverfish, Sowbugs, Spiders, Brown Dog Ticks, Fleas, Earwigs and Carpet Beetles: Apply spray in small amounts directly into cracks and crevices.

STORAGE AND DISPOSAL

Store in a cool dry area away from heat and open flame. Disposal: Do Not Puncture or Incinerate! If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

First Aid

If Swallowed: Call Poison Control Center or doctor immediatelyfor treatment advice. Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by the Poison Control Center or doctor. Do not give anything by mouth to an unconscious person. If Inhaled: 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: 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: 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. Call a Poison Control Center or doctor for treatment advice.

Have the product container or label with you when calling a Poison Control Center or doctoror going for treatment.

Physical and Chemical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or comments? Call 800-332-5553

(Optional) Contains No CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Made in the USA for Spectrum Group, Division of United Industries Corp., P.O. Box 142642, St. Louis, MO 63114-0642 EPA Reg. No. 8845-122

EPA Est. No. 9688-MO-1 Form 8845122FA&DCorrection.wpd ©2003