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JUN 16 1998

Mr. William Metzger
United Industries Corp.
8825 Page Blvd.
St. Louis, MO 63114

Dear Mr. Metzger:

Subject: Updated Labeling
Real-Kill Automatic Indoor Fogger II
EPA Registration No. 478-126
Hot Shot Fogger V
~~EPA Registration No. 8845-123~~
Chemsico Tralomethrin Indoor Fogger
EPA Registration No. 9688-78
Chemsico Tralomethrin Insecticide F
EPA Registration No. 9688-119
Your Application Dated September 5, 1997

The amendment 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 indicated below prior to release for shipment of product bearing the amended labeling:

1. Revise the heading "Physical Hazards" to read "Physical or Chemical Hazards". This heading should appear on all labeling and any previously approved labeling with the incorrect heading should be corrected at the next label printing.
2. Per the upcoming final rule for total release foggers add the following statement to Physical or Chemical Hazards: "This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully."
3. Move the user statement "For Household Use Only" to the front panel.
4. Products containing permethrin were never approved for use in the food areas of food handling establishments since permethrin is classified as a category C carcinogen (possible human carcinogen). Therefore as indicated in our October 1, 1997 letter

reinstate ~~under~~ Precautionary Statement or Direction for Use the statement "Do not use in commercial food handling establishments, restaurants or other areas where food is commercially prepared or processed"...

- 5. Delete the optional claim "and their hatching eggs". This claim is only appropriate for products in combination with an IGR like methoprene.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,

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

Enclosure



FOGGER V

[Kills flies, cockroaches, fleas (adult and pre-adult [larvae]), saw-toothed grain beetles, ticks, confused flour beetles, rice weevils, small flying moths, pillbugs, crickets • Kills fleas and their hatching eggs plus neutralizes pet odors and freshens home • With pet odor neutralizer • Kills fast • Fog and return in 2 hours • One unit [can] treats up to 6,000 cubic feet • Water-based • Non-staining • Leaves no odor]

When used as directed, it will not harm drapes, upholstery fabrics, carpeting, bedspreads, clothing, linens, furniture, walls, floor tiles, ceilings, shades or blinds.

One can treats an entire room (up to 25' x 30' with an 8' ceiling) [with an effective bug killing fog that leaves no unpleasant odor.]

Active Ingredients:

Pyrethrins	0.050%
+N-Octyl bicycloheptene dicarboximide	0.400%
Permethrin [(3-Phenoxyphenyl)methyl (+/-) cis-trans-3-(2,2-dichloroethyl) 2,2-dimethylcyclopropanecarboxylate]	0.400%
Related reaction products	0.035%
Inert Ingredients†	99.115%

+MGK 264, Insecticide Synergist. *cis-trans isomer ratio: min 35% (+/-) cis, max 65% (+/-) trans. †Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for additional precautionary statements

NET WT. 6 OZ.

Kills [roaches] [cockroaches], fleas (adult and pre-adult [larvae] [Option: and their hatching eggs], ticks, spiders, houseflies, mosquitoes, small flying moths, silverfish, crickets, confused flour beetles, sawtoothed grain beetles, rice weevils, pillbugs, ants, wasps and other unwanted insects.

For use in rooms, apartments, homes, attics, basements, garages, pet sleeping areas and cabins.

STOP [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 For household use only. *Added*

TO USE THIS PRODUCT CORRECTLY

Turn off ALL ignition sources such as pilot lights (shut off gas valve), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.) Call your utility or management company if you need assistance.

DO NOT use more than one fogger per room. One can treats a room up to 25' ft. x 30' ft. with an 8' ceiling.

DO NOT use in small, enclosed spaces such as closets, cabinets, or under counters or tables. Do not use in a room 5 ft. x 5 ft. or smaller; instead, allow the fog to enter from other rooms.

BEFORE YOU FOG

Cover or remove exposed food, dishes and food preparation equipment. Open cabinets and doors. Shut off fans and air conditioners and turn off all ignition sources as directed above. Remove pets including birds. Cover and turn off fish tanks. Close outside doors and windows.

TO START FOGGING

- Place several layers of newspaper or paper towels on a table, stand or floor in center of room. Cover waxed wood floors and waxed tile floors in the immediate area surrounding the fogger. Newspapers may be used.

Graphic: Valve locking.

- SHAKE WELL BEFORE USING. Tilt can top away from face. Press valve all the way down, hooking the catch.
- Set can on newspaper or paper towels and leave the premises immediately. Do not re-enter treated area for two hours.

AIRING OUT

After two hours, open all doors and windows, turn on air conditioner and fans and air out for 30 minutes. Re-apply every two to four weeks if needed.

NOTE: When treating for fleas or ticks, clean and treat pet sleeping areas. Also treat dogs and cats with a flea and tick control product registered for use on pets before allowing them to enter the treated areas.

STORAGE AND DISPOSAL

Store in cool, dry area away from heat or open flame. Discard container in trash. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Avoid breathing vapor and spray mist. Avoid contact with skin and eyes. Avoid contamination of food and drinking water. All food preparation surfaces and utensils should be covered during treatment or thoroughly washed before use.

First Aid - If Swallowed: Call a physician or Poison Control Center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Never induce vomiting or give anything by mouth to an unconscious person. **If on Skin:** Wash contaminated clothing and wash affected areas with plenty of soap and water. **If in Eyes:** Flush eyes with plenty of water. Call a physician if irritation persists. **If Inhaled:** Remove victim to fresh air. Apply artificial respiration if indicated.

Physical Hazards - Contents under pressure. Do not use near heat or open flame. Do not puncture or incinerate. 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

Contains NO CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Made in the USA for Spectrum Group, Division of United Industries Corporation, P.O. Box 15842, St. Louis, MO 63114-0842

EPA Reg. No. 8845-123

EPA Est. No. 9688-MO-1

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Adapted from most recent EPA Approval 9688-119

Graphic: Food being covered.

Graphic: Newspaper on a stool or furniture covered.

ACCOMMODATIONS in the immediate area surrounding the fogger. Newspapers may be used. with COMMENTS in EPA Letter Dated

JUN 16 1998

[Bracketed Text] = Optional Language

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 8845-123

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