

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

27 JUL 1994

Mr. Edward Piranian
Safeguard Chemical Corporation
411 Wales Avenue
Bronx, NY 10454

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Dear Mr. Piranian,

Subject: Revised, Updated Product Labeling
Safeguard Household Roach/Insect Killer
EPA Registration Number 8848-14
Submission Dated June 2, 1994

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. Three (3) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the product label is enclosed for your records.

1. The footnote to the ingredients statement should read "...0.20% related..." rather than "....20% related....".
2. Delete the term "GENERAL" which appears as a heading to the paragraph which begins "Cover exposed foods....".
3. Revise the statement "Cover exposed foods, dishes,....." to read as follows: Cover or remove exposed food, dishes, utensils, and food contact surfaces and equipment prior to treatment of the area.
4. Revise the statement "Turn off fans and air conditioners..." to read as follows: Turn off all fans and air conditioners and extinguish all flames and pilot lights.
5. Revise the statement "Do not remain in the area...." to read as follows: Do not remain in the area during treatment. Vacate the room or building immediately and allow treated area to remain closed for four hours prior to reentry.
6. The phrase "...double the above dosage" is not clear. Calculate the specific dosage and provide this information explicitly within the text of this label statement.
7. Expand the statement "Remove pets, birds,...." to read as follows: Remove pets and birds, and cover or remove fish aquariums before spraying.
8. Revise the statement "Replace cap and discard...", which appears in the DISPOSAL section of the product label, to read as follows: Replace cap, wrap container in several layers of newspaper, and discard in trash.

CONCURRENCES

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DATE							

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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It is understood that the *petroleum distillates* have been removed from the active ingredient declaration and included in the total percentage for the inert ingredients.

A CONFIDENTIAL STATEMENT OF FORMULA (CSF) was submitted with the package dated August 23, 1993. This CSF was neither acknowledged nor accepted by the Agency. It is noted that the product formulation of record (dated August 7, 1978) for this pesticide contains the inert ingredient *methylene chloride*, which has been banned as a component in pesticide formulations by the Agency under the Clean Air Act. A telephone conversation was subsequently initiated by Daphne Waldo of my team during which she spoke with you regarding the exact formulation which is currently being manufactured and sold. It is our understanding that the *methylene chloride* is no longer a formulation component in the manufactured pesticide product. It is further understood based upon this conversation that the CSF attached to the submission dated August 23, 1993 is the formulation which is currently manufactured by Safeguard and marketed as *Safeguard Household Roach and Insect Killer*.

A pesticide formulation can not be manufactured or marketed until it has been reviewed and accepted by the Agency. However, in this unique case involving *methylene chloride*, rather than submitting this product to the Office of Compliance Monitoring for enforcement purposes, the Agency will acknowledge and accept this new formulation as the formulation of record. Therefore, you may continue to produce and market this revised formula at this time. At no time may you distribute or market a formulation which differs from the formulation of record without submitting an amendment package stating this request to the Agency for review.

The compound *1,1,1-trichloroethane* has been specifically targeted by the Agency, as a result of the provisions of the Clean Air Act, as an chemical which will no longer be acceptable for use as an ingredient contained in pesticide formulations, due to the ozone-depleting nature of this compound. At this time, you may wish to consider reformulating this product to delete this chemical compound from the product and substitute a more appropriate inert ingredient.

Sincerely,

Mr. Marion J. Johnson, Jr.
Acting Product Manager 10
Insecticide-Rodenticide Branch
Registration Division

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DATE								

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SAFEGUARD HOUSEHOLD ROACH & INSECT KILLER

Automatic Continuous Spray
Effectively Kills Insects Listed On Back Panel

**JUST PRESS DOWN TO LOCK
AND LEAVE ROOM**

ACTIVE INGREDIENTS:

Pyrethrins.....	0.40%
*Piperonyl Butoxide, Technical.....	1.00%
N-Octyl Bicycloheptene Dicarboximide.....	1.50%
**INERT INGREDIENTS.....	97.10%
TOTAL	100.00%

*Equivalent to .80% (Butylcarbityl) (6-propylpiperonyl) ether and 20 % related compounds.

****CONTAINS PETROLEUM DISTILLATES**

KEEP OUT OF REACH OF CHILDREN

CAUTION

CONTENTS UNDER PRESSURE.

See Back Panel For Additional Precautionary Statements.

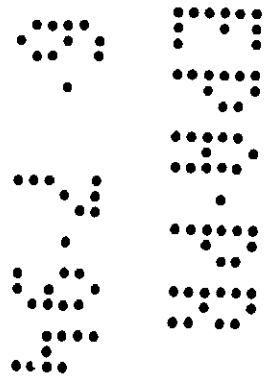
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ACCEPTED
with COMMENTS
in EPA Letter Dated

27 JUL 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the periods
registered under EPA Reg No.

[Signature]



HOUSEHOLD ROACH & INSECT KILLER

495

DIRECTIONS FOR USE

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

AS A TOTAL RELEASE PRESSURIZED SPRAY AND INDOOR FOGGER

To Kill Houseflies, Mosquitoes, Small Flying Moths, Gnats, Black Carpet Beetles, Spiders, Centipedes, Silverfish, Crickets, Firebrats, Bees, Wasps, Hornets and Ants. Aids in the control of waterbugs and cockroaches.

GENERAL

Cover exposed foods, dishes, utensils and food handling equipment and surfaces. Open cabinets and doors to expose areas to be treated. Turn off fans and air conditioners and put out all flames and pilot lights. Close all doors and windows. Point valve opening away from face and eyes when releasing. Use one can for each 6,000 cubic feet of unobstructed area. Use additional units for remote rooms or where a free flow of mist is not assured. Do not remain in the area during treatment, leaving room or building at once and keep the area treated closed for four hours before entering and airing out. After this treatment, open doors and windows and allow to air out for 30 minutes. Repeat spraying in two weeks if necessary.

TO OPERATE VALVE AS A TOTAL RELEASE SPRAY

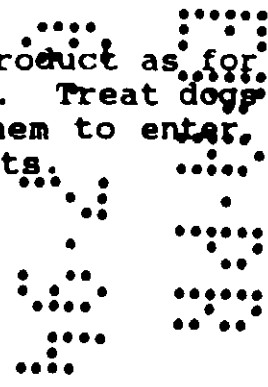
To lock valve for total activity, hold container upright away from you and point valve opening away from face and eyes. Press valve button all the way down until it hooks into and catches on bottom of rim. Then place fogger on stand or table in center of room with valve locked open, placing several layers of newspaper under can. Follow directions in above paragraph.

AS A PRESSURIZED SPRAY FOR SPOT TREATMENT

To kill Houseflies, Mosquitoes, Small Flying Moths, Gnats, Wasps, Hornets and Bees: If operated manually, do not use as a total release pressurized spray. Close all doors and windows. Spray about 5-10 seconds for average room. It is not essential to hit flying insects. The airborne mist will kill insects as they fly through it. For hornets and Wasps, double the above dosage. Sweep up and destroy fallen insects. Repeat treatment as necessary

To kill Ants, Silverfish, Firebrats, Spiders, Centipedes, Crickets and aids in the control of Cockroaches and Waterbugs: Spray hidden places such as baseboards, crevices, openings around sinks and pipes under cabinets and refrigerators. To kill ants, treat doors, around window frames and ant trails. Spray directly on bugs when possible. Repeat as needed.

To kill Ticks: Remove and destroy pet's old bedding. Apply this product as for other insects. Put fresh bedding in pet's quarters after treatment. Treat dogs and cats with a registered tick control product before allowing them to enter. Repeat applications may be necessary to insure contact with all pests.



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HOUSEHOLD ROACH & INSECT KILLER

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. In case of contact, wash contaminated skin promptly with soap and water. For eyes, flush with plenty of water and get medical attention if irritation persists. Avoid contamination of food and feedstuffs.

Do not use in commercial food processing preparation, storage or serving areas. In the home, all food processing surfaces and utensils should be covered during treatment and thoroughly washed before use. Cover exposed food.

Remove pets, birds, and fish aquariums before spraying.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. This product contains petroleum distillate solvent which may present an aspiration hazard. Gastric lavage is indicated if material was taken internally. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

IF ON SKIN OR CLOTHING: Remove contaminated clothing and wash before re-use. Wash skin with soap and warm water. Get medical attention if irritation persists.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

ENVIRONMENTAL HAZARDS

Keep out of lakes, streams and ponds. Do not apply directly to water or to areas where surface water is present. Do not contaminate water by disposal.

PHYSICAL AND CHEMICAL HAZARDS

CAUTION: FLAMMABLE. 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.

STORAGE AND DISPOSAL

DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.

STORAGE: Store in a cool dry area away from heat or open flame.

DISPOSAL: Do not re-use empty container. Replace cap and discard containers in trash. Do not puncture or incinerate.

WARNING: Contains 1,1,1-Trichloroethane, a substance which harms public health and the environment by destroying ozone in the upper atmosphere.

EPA REG. NO. 8848-14

EPA EST. NO. 10806-NJ-1

SAFEGUARD CHEMICAL CORPORATION
NEW YORK, NY 10454
MADE IN U.S.A.

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