

JAN 25 2006

SAFEGUARD CHEMICAL CORPORATION

411 Wales Avenue

Bronx NY 10454

Dear Ms. LaRocco:

Subject: Label Revisions

Product Name: 707 Made Especially for Bedbugs & Fleas

EPA Registration No. 8848-53

Response to Agency's letter dated Sept. 14, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below.

a) You must add the following statement to the First Aid subsection of the label to read:

- IF SWALLOWED:**
- o Immediately call a poison control center or doctor.**
 - o Do not induce vomiting unless told to do so by a poison control center or doctor**
 - o Do not give liquid to the person.**
 - o Do not give anything By mouth to an unconscious person.**

b) Add statements in the **Directions for Use** section to read:

- o Allow treated surfaces to dry before permitting people or pets to return to treated areas.**
- o Infirm residents or patients must be removed prior to treatment. Ventilate rooms for 2 hours before returning patients.**
- o Do not spray food/feed humans or pets. Do not use in commercial food preparation areas or in edible product areas of food processing plants. Do not apply to human, pets, plants, or contaminate feed, foodstuffs, dishes, utensils or food contact surfaces.**
- o Cover and avoid spraying fish aquariums.**

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- c) Remove the statement **"CAUTION"** in the **"PHYSICAL AND CHEMICAL HAZARDS** section. Move the statement **"To avoid possible staining, test first in any inconspicuous place check results the following day to the Physical and Hazards Section.**
- d) In the **STORAGE AND DISPOSAL** section correct the spelling of **"STORAG3E"** to **"STORAGE"**.
- e) Add the statement **"Manufactured by"** above the Company Name and Address.

Enclosed is a copy of your stamped label "Accepted with Comments". Submit three (3) copies of your final printed labeling before you release the product for shipment.

To expedite handling, please return a copy of this letter with your final printed labels. If you have any questions regarding this letter, contact Ms. Pat Quarles @ 703-305-6876.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505

enclosure

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JAN 25 2006

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

~~8848-53~~

707

**MADE ESPECIALLY FOR
BEDBUGS & FLEAS**

ACTIVE INGREDIENTS:

Pyrethrins.....	.10%
*Technical Piperonyl Butoxide.....	.40%
**INERT INGREDIENTS.....	<u>99.50%</u>

TOTAL	100.00%
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*Equivalent to 0.32% (Butyl Carbityl) (6-Propylpiperonyl) ether
and .08% related compounds.

****Contains Petroleum Distillate**

KEEP OUT OF REACH OF CHILDREN

CAUTION

CONTENTS UNDER PRESSURE

SHAKE WELL BEFORE USE

Read other cautions on back panel.

Net Wt. 7 Oz. (196 g)

Left Back Panel

707
MADE ESPECIALLY FOR BEDBUGS AND FLEAS

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Do not use as a space spray. This product is designed for spot application only. Do not spray food, humans or pets. Do not use in commercial food preparation areas or in edible product areas of food processing plants. Do not apply to humans, pets, plants, or contaminated feed, foodstuffs, dishes or utensils. Wash after handling and before eating or smoking. Avoid prolonged and repeated contact with skin. In case of contact, wash with soap and water. Avoid inhalation. To avoid possible staining, test first in any inconspicuous place check results the following day. Cover and avoid spraying fish aquariums.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and other wildlife. Keep out of lakes, streams or ponds. Apply product only as specified on this label.

PHYSICAL AND CHEMICAL HAZARDS

CAUTION: FLAMMABLE. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130 degrees Fahrenheit may cause bursting. **DO NOT USE OR STORE NEAR FIRE OR OPEN FLAME.**

FIRST AID

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 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

NOTE TO PHYSICIAN - Contains petroleum distillate - vomiting may cause aspiration pneumonia

*Have the product container or label with you when calling a poison control center or a doctor, or going for treatment. For information regarding medical emergencies or pesticide incidents, call 1-800-858-7378.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool dry area inaccessible to children and pets away from heat, sparks, open flame or pilot light.

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

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Right Back Panel

707
MADE ESPECIALLY FOR BEDBUGS AND FLEAS

KEEP CAN UPRIGHT WHEN SPOT TREATING. DO NOT BEND CAN SIDEWAYS, OR UPSIDE DOWN.

DIRECTIONS FOR USE

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

FOR SPOT APPLICATION ONLY. DO NOT USE AS A SPACE SPRAY.

Remove protective cap. Hold dispenser upright, point valve opening away from face, and about 8-10 inches from surface being treated. Aim nozzle, press plastic button to release and spray. Spray until moist, do not soak. Repeat as necessary. Windows and doors may be left open while spraying.

BEDBUGS: Spray upholstered furniture in tufts, and especially under and around seams and ends of fabric. Take bed apart. Spray mattress seams, bedsprings, bed frame, and joints. Spray floor, rugs, floorboards, moldings, baseboards and furniture legs. Air premises thoroughly and permit treatment to dry before using.

FLEAS: Spray floors, floor coverings, and other places infested by fleas. Spray sleeping quarters of animal pets, and change bedding after spraying. Do not use on animal or pets. Allow treated surfaces to dry before permitting pets to return to treated areas.

EPA REG. NO. 8848-53
EPA EST. NO. 10806-NJ-1

THE 707 COMPANY DIV. OF
SAFEGUARD CHEMICAL CORPORATION
NEW YORK, NY 10454