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Mr. Michael J. Tragakiss
Waterbury Companies, Inc.
32 Mattatuck Heights
Waterbury, CT 06705

Dear Mr. Tragakiss,

Subject: Deletion of Methylene Chloride From the Formulation
and Updated Labeling
Purge Total Release Insecticide
EPA Registration No. 9444-36
Your Submission Dated May 4, 1989

The labeling 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 listed below before you release the product for shipment bearing the amended labeling:

1. Add the following to the Precautionary Statements after "Evacuate occupants and pets completely from the premises before starting treatment.":

Keep all unprotected persons out of operational areas.

2. Add the following heading before "If Swallowed":

STATEMENT OF PRACTICAL TREATMENT

3. The Statement of Practical Treatment must appear on the front panel of products bearing the signal word DANGER and Skull and Crossbones.

4. The Note to Physician should appear immediately following the last statement of practical treatment (i.e., "If In Eyes"). Please revise the note as follows:

Note to Physician: Vapona and Baygon are cholinesterase-inhibiting pesticides. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

5. The sections "Antidote and First Aid Treatment", "If Poisoning Symptoms Appear", "Poisoning Symptoms", "Solvent presents aspiration hazard...", and "Treatment" are disorganized and confusing. The statements must be incorporated under the Precautionary Statements or the Note to Physician.

LEMaster 4/12/90

6. "Industrial Use" implies use in food/feed areas of food/feed handling establishments. Therefore, the following limitations must be added to the label:

Do not use in the food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

7. Use in food handling establishments can imply use in U.S. Department of Agriculture (USDA) Meat and Poultry Plants. Therefore, either add the statement "Not for Use in USDA Meat and Poultry Plants" or submit an application to USDA requesting use in these areas. If granted, you can then indicate on the label that the product can be used in these areas.

8. Under Physical or Chemical Hazards add "Extremely Flammable" before "Contents under pressure."

9. Since your data matrix does not give a dielectrical breakdown voltage, you must add the following to the use directions:

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

10. Revise the company name and address to reflect the change of ownership of this company number and product registration.

Based on the current Confidential Statement of Formula (CSF) dated May 4, 1989, your product will not meet the label claim for the active ingredient. Note that the lower limit of the active must be the same as the label claim in pure active form. Please revise the label or the CSF so the information agrees.

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Submit five 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 (15)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER. PURGE TOTAL RELEASE INSECTICIDE is poisonous if swallowed, inhaled or absorbed through the skin or eyes. Do not get vapor or liquid on skin or eyes. Do not get on clothing. Wear a full face mask or respirator, jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11. Wear rubber gloves. Also wear clean protective clothing with head and skin surfaces covered to that an bare skin is exposed. In case of contact remove contaminated clothing immediately. Wash or shower thoroughly and put on clean clothing, including shoes. Wash hands, arms and face with soap and water before eating or drinking. Do not allow children or pets to contact treated surfaces until they are dry. Note that this product is not to be applied to carpeting, drapery, wall-to-wall carpeting, materials that may be stained. Avoid excessive wetting of plastics, rubber and painted materials such as walls and floor coverings. Do not eat, drink, smoke or use tobacco products until an uncontaminated meal.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not hit or store near heat or open flame. Exposure to temperatures above 130°F may cause swelling. Never store this product in a car or incinerator.

ANTIDOTE AND FIRST AID TREATMENT. ATROPINE is the emergency antidote for DDVP insecticide poisoning. IN ALL CASES OF SUSPECTED POISONING CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY.

If swallowed: It is preferable to induce vomiting under medical supervision. However, if immediate medical assistance cannot be obtained, give victim one or two glasses of water and induce vomiting by reaching the back of the throat with finger. Repeat until vomit fluid is clear. Never give anything by mouth to a conscious or unconscious person.

If inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.

If on skin: Remove contaminated clothing and wash affected areas with soap and water.

If in eyes: Flush eyes with plenty of water. Get immediate medical attention.

IF POISONING SYMPTOMS APPEAR, NEVER ADMINISTER ATROPINE unless poisoning symptoms appear. (See POISONING SYMPTOMS below.) Keep patient prone and quiet. Start artificial respiration immediately if patient is not breathing. Transport the patient immediately to the nearest hospital.

NOTE TO PHYSICIAN-POISONING SYMPTOMS. Symptoms include weakness, headache, dizziness in chest, blurred vision, nausea, vomiting, pupil dilation, sweating, muscle twitching, diarrhea and abdominal cramps.

Solvent presents aspiration hazard. Gastric lavage is indicated if material was taken internally.

TREATMENT. ATROPINE is the specific therapeutic antagonist of DDVP against parasympathetic nervous stimulation. It reverses the signs of parasympathetic stimulation. Atropine sulfate should be injected at 10 minute intervals in doses of 12 milligrams until complete atropinization has occurred. Morphine is contraindicated. Clear chest by postural drainage. Observe patient continuously for 48 hours.

Repeated exposure to Cholinesterase inhibitors may without warning cause prolonged susceptibility to very small doses of any Cholinesterase inhibitor. Allow no further exposure until tests for Cholinesterase regeneration has been allowed as determined by blood test.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Must be used by licensed pest control operators. Use 1-17 oz. can for every 12,000 cubic feet of space. During handling and operation use face mask or respirator, jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11. All drifts and exhaust outlets must be shut off during fogging. Evacuate occupants and pets completely from premises before starting treatment. Fish bowls must be covered or removed. Heavy plastic must be covered within 2 feet of insect bomb. Unwrapped or unpackaged food must be removed during fogging. After application do not reoccupy premises for at least 2 hours. Before reoccupying, open all doors and windows and ventilate thoroughly for at least one hour. Do not allow children or pets to be or sleep in treated areas until at least 6 hours following treatment. Wash dishes and kitchen utensils thoroughly. Do not contaminate water supply or other foodstuffs.

NOTE: This product may not control hidden crawling insects. It will control only those insects that come in contact with the mist. The more complete control of an infestation of these crawling insects may not be achieved.

Place can in center of area to be treated. Place newspaper under can. Push down 1/2 in. top of valve until it locks. Leave premises immediately. The entire contents will release automatically.

STORAGE & 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.

PESTICIDE DISPOSAL: Pesticide that cannot be used according to label instructions must be disposed of according to applicable federal, state and local procedures.

CONTAINER DISPOSAL: Replace cap and discard empty container in wash, sanitary landfill or by other approved state and local procedures. Do not incinerate or puncture.

PRECAUTION IN USING PURGE TOTAL RELEASE INSECTICIDE: Do not use when there are children or pets in the area. Do not use in areas where children or pets may not be able to reach or handle. Care should be used in handling empty containers.

E.P.A. Reg. No. 9444-36

E.P.A. Reg. No. 2434-04-1

Manufactured by CLINE-BUCKNER, INC., A subsidiary of Waterbury Companies, Inc. Artesia, Ca 90701 Independence, La 70443



purge™ total release insecticide

with Vapona/Baygon®

FOR SALE TO, USE AND STORAGE BY PEST CONTROL OPERATORS ONLY

KILLS EXPOSED STAGES OF FLIES, COCK-ROACHES, FLEAS, TICKS & SILVERFISH. FOR INDUSTRIAL & HOME USE.

ACTIVE INGREDIENTS:

Dichloroovos [2,2-Dichlorovinyl	
Dimethyl Phosphate]	6.50%
Related compounds	.50%
2-(1-methyl-ethoxy) phenol	
methycarbamate	1.00%
INERT INGREDIENTS	92.00%
	100.00%

BAYGON is a reg. TM of the Parent Company Farben Fabriken Bayer GmbH, Germany.



KEEP OUT OF REACH OF CHILDREN DANGER

See additional precautions and antidote information on back panel.

NET WEIGHT 12 oz. / 340 g

Can # 210

ACCOUNTED with COMMENTS in EPA Letter Date

BEST AVAILABLE

9444-36