

MAR 11 1999

Mr. Ruben Mendoza
Registration Specialist
Waterbury Companies, Inc.
P.O. Box 640
129 Calhoun Street
Independence, LA 70443

Subject: Application for Re-registration dated February 15, 1999
Invader II Residual with Baygon
EPA Registration No. 9444-204
Label Amendment

Dear Mr. Mendoza:

The Re-registration Eligibility Decision (RED) for Propoxur was issued before the subject product was registered. Therefore, we have disregarded most of the contents of the re-registration package you submitted, except the revised label. We have treated your submission as a label amendment to comply with labeling requirements specified in the RED.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes and submit one (1) copy of final printed labeling to us before you ship your product bearing the amended labeling:

1. Re-order your precautionary statements as follows:

CAUTION

Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing of spray mist and provide adequate ventilation of area being treated. Contact with skin, eyes, or clothing should be avoided. Personal protective equipment must include: long-sleeved shirt and long pants, chemical-resistant gloves, and shoes plus socks. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Avoid contamination of food, utensils, and food preparation areas. Do not apply this product in a way

that will contact any person or pet, either directly or indirectly. Keep people and pets out of the area during application.

Should illness occur, get prompt medical aid. To Physician -- Atropine Sulfate is antidotal. [Make sure you do not repeat this sentence]

2. Replace "ENVIRONMENTAL HAZARDS" with "ENVIRONMENTAL HAZARDS".
3. Because your product is registered for liquid application, you must add the following statement under Directions of Use:

Entry Restrictions: Do not allow people or pets to enter the treated area until sprays have dried.

The registration of your product will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely,



Rita Kumar, Senior Regulatory Specialist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure: Stamped label

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ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAR 11 1999



CRACK AND CREVICE INJECTION USE ONLY

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals
CAUTION

Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing of spray mist and provide adequate ventilation of area being treated. Personal protective equipment must include: long-sleeved shirt and long pants, chemical-resistant gloves, and shoes plus socks. Contact with skin, eyes or clothing should also be avoided. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Wash thoroughly after using. Avoid contamination of food, utensils, and food preparation areas. Do not apply this product in a way that will contact any person or pet, either directly or indirectly. Keep people and pets out of the area during application. Should illness occur, get prompt medical aid. To Physician — Atropine Sulfate is antidotal.

STATEMENT OF PRACTICAL TREATMENT

If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.
If Swallowed: Call a physician or Poison Control Center. Induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.
If on Skin: Remove contaminated clothing and wash affected areas with soap and water.
If in Eyes: Flush eyes with plenty of water. Call a physician immediately.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on the label.

PHYSICAL OR 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. Do not spray on plastic, painted or varnished surfaces or directly into any electronic equipment such as radios, televisions, computers, etc.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This insecticide is for use only with injection tube and for injecting into cracks and crevices where insects may be hiding, living and breeding. Place injector tip 1/8 inch into cracks, crevices, holes and other small openings where insects may be a problem. Release approximately 1 second spray per spot. In serious infestations, if possible, place spots approximately 12 inches apart. In light infestations or preventative treatment, place spots approximately 3 feet apart. See the additional directions below for effective control of specified insects.

CRAWLING PESTS: Cockroaches, Waterbugs, Spiders, Brown Dog Ticks, Earwigs, Crickets, Sowbugs, Millipedes, and Centipedes—Spray into hiding places such as cracks and crevices, moist areas, openings around pipes and sinks, under refrigerators, behind baseboards, coffee makers, meter boxes and manholes. Spray directly on insects in these locations where possible. Repeat as necessary.

BOOKLICE & SILVERFISH: Spray cracks and crevices in baseboards, doorframes, bookcases and storage areas. Spray directly on insects in these locations where possible. Repeat as necessary.

ANTS: Spray into nests, trails and points of entry around doors, windows, structural cracks and crevices. Spray directly on insects in these locations where possible. Repeat as necessary.

GRAIN WEEVILS, FLOUR BEETLES, CHOCOLATE MOTHS, DRUGSTORE BEETLES (in exposed adult and larval stages) and hibernating stages of BOXELDER BUGS, ELM LEAF BEETLES, CLUSTER FLIES and CLOVER MITES: Contact as many insects as possible when treating infested areas such as cracks and crevices in wall voids, around windows and doorframes, under siding, in machinery, and in dark, secluded areas. Repeat as necessary.

For TERMITES: Inject 5-10 seconds spray into insect tunnels and cavities. This application is not a substitute for mechanical alteration, soil treatment or foundation treatment but is merely a supplemental treatment. For control of above-ground termites in localized areas, apply to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting with a void injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected using a void injector. It is desirable to physically remove carton nest material from building voids when such nests are found. This type of application is intended to be a supplemental treatment for control of drywood and above-ground subterranean termites and other wood-infesting insects. This product is intended to kill workers or winged reproductive forms which may be present in the treated areas.

Localized treatment of wood destroying insects: CARPENTER ANTS and CARPENTER BEES—Locate source of infestation. Inject 5-10 seconds of spray into insect tunnels and cavities. For control of carpenter ants in houses and other structures, apply as a spot, crack and crevice or wall void application. Repeat treatments when necessary. Apply around doors and windows and other places where carpenter ants may enter the premises. Spray into cracks and crevices or through small drilled holes into voids where these ants or their nests are present. Use a sufficient amount of coarse spray to cover the area. For control of carpenter bees in structures, spray the liquid directly into gallery entrance holes. Following treatment, the entrance holes may be left open 24 hours to be certain that returning adult bees are killed. When there is no activity, the hole may be sealed with a suitable sealant.

Applications in Aircraft: This product can be applied in cargo areas but not in occupied aircraft cabins, unless cabins are ventilated for (3) hours before reentering.

APPLICATIONS WITHIN FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS

Limited to Crack & Crevice Treatment Only. Apply a small amount of material directly into cracks and crevices such as expansion joints between different elements of construction or between equipment bases and the floor, wall voids, motor housing, junction boxes or switch boxes, conduits or hollow equipment legs where insects hide. 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. Applications of this product in the food areas of food handling establishments, other than as a crack and crevice treatment, are not permitted.

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.

DISPOSAL: This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. DO NOT PUNCTURE! If recycling is not available, wrap the container and discard in the trash.



ACCEPTED
with COMMENTS
in EPA Letter Dated:
MAR 11 1999
CB
COMPANIES, INC.
P. O. Box 1812
Waterbury, CT 06722
Made in USA

Under the Federal Insecticide, Fungicide, and Rodenticide Act

EPA 204-10-REV 1/99 (PNT1/99)
Revision #2 2/12/99

7444-204

INVADER™ II

Residual

with Baygon

- Provides Rapid Control of Residential and Industrial Pests
- Quick Knockdown

KILLS: Cockroaches, Waterbugs, Spiders, Brown Dog Ticks, Earwigs, Crickets, Sowbugs, Millipedes, Centipedes, Booklice, Silverfish, Ants, Grain Weevils, Flour Beetles, Chocolate Moths, Drugstore Beetles, Boxelder Bugs, Elm Leaf Beetles, Clover Mites, Cluster Flies; WOOD INFESTING PESTS- Termites (Subterranean, Formosan, Drywood), Carpenter Ants and Carpenter Bees.

FOR USE IN Hospitals, Supermarkets, Motels, Hotels, Homes Transportation Equipment (Buses, Boats, Ships, Trains, Trucks, Aircraft), Utilities, Meat Packing and Food Handling Establishments, Schools, Warehouses, Restaurants and Other Commercial Buildings

ACTIVE INGREDIENT:

Propoxur (CAS# 114-26-1)	1.00%
OTHER INGREDIENTS	99.00%
	100.00%

Baygon® is a Reg. TM of the parent company
Farbenfabriken Bayer GmbH, Germany.

Contains No CFCs or Other Ozone Depleting Substances.
Federal Regulations Prohibit CFC Propellants in Aerosols.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Additional Precautionary Statements.

EPA Reg. No. 9444-204

EPA Est. No. 9444-I A-1

NET WEIGHT 20 oz / 567 g