

NOV 14 1991

Mr. David M. Valentine
Nationwide Chemical Products Inc.
P.O. Box 13027
Hamilton, Ohio 45013

Dear Mr. Valentine:

Subject: Label Revisions and Alternate Formulation
Pro Kill Expel Roach & Ant Killer
EPA Registration No. 9591-124
Your Submissions Dated January 9, 1991 and May 10, 1991

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable, provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling change listed below before you release the product for shipment bearing the amended labeling:
 - a. The following statement must be deleted, as directed in our letter of December 20, 1990:

"Equipment and utensils in Federally inspected meat and poultry plants must be washed with an acceptable detergent and rinsed with potable water to remove all traces of contamination."

This statement implies that this product is authorized for use in Federally inspected meat and poultry plants. You may only make that claim if you have submitted an application to the United States Department of Agriculture and received from them an authorization to do so. Mr. John Damare, Branch Chief of the Product Safety Branch, Food Safety and

Inspection Division of the USDA has concurred with our position, the above statement goes hand-in-hand with the authorization statement, and therefore must be removed from this labeling.

3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Additionally, please note that we have also reviewed the Certification With Respect to Citation of Data and the Confidential Statement of Formula (CSF), submitted in response to Agency letters dated December 20, 1990 and March 29, 1991. The Certification With Respect to Citation of Data form, which indicates your choice of the Cite-All method of data support, is acceptable. The revised CSF is now in agreement with existing label text ("Flammable", "Contains Petroleum Distillates") and is also acceptable.

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

Sincerely yours,

DHE

Dennis H. Edwards, Jr.
Product Manager (19)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enc.

**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. Contact with skin, eyes or clothing should be avoided. Do not use as a space spray. Do not use in edible product areas of food processing plants, restaurants or other areas where food is commercially processed or prepared. Do not use in serving areas while food is exposed.

PHYSICAL OR CHEMICAL HAZARDS

Flammable: Contents under pressure. Keep away from heat, sparks or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Turn off pilot lights in area of spraying.

STATEMENT OF PRACTICAL TREATMENT

- IF IN EYES: Flush with water. See physician if irritation persists.
- IF ON SKIN: In case of contact, remove contaminated clothing and wash skin with soap and water.
- IF INHALED: Remove victim to fresh air. Apply artificial respiration if needed.
- IF SWALLOWED: Do not induce vomiting. Seek medical attention immediately.

STORAGE & DISPOSAL

- STORAGE: Store in a cool dry area away from heat and open flame.
- DISPOSAL: Replace cap and discard container in trash. Do not incinerate or puncture.

Our recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer or seller, no guarantee, expressed or implied, is made as to the effects of such results to be obtained if not used in accordance with label directions or established safe practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

Nationwide Chemical Products, Inc.
P. O. Box 13027
Hamilton, Ohio 45013

ACCEPTED
with COMMENTS
in EPA Letter 04/88

NOV 14 1991

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

9591-124

**PRO KILL
EXPEL ROACH & ANT
KILLER**

Kills: Cockroaches, Waterbugs, Ants, Silverfish, Spiders, Crickets, Earwigs, Sowbugs, Brown Dog Ticks, Fleas, Millipedes, Centipedes, Booklice, Wasps, Hornets, Grain Weevils, Flour Beetles, Chocolate Moths, Drug Store Beetles, Boxelder Bugs, Elmleaf Beetles, Clover Mites, Cluster Flies, Carpenter Ants, Carpenter Bees and Termites.

For use in hospitals, supermarkets, motels, hotels, homes, transportation equipment (buses, boats, ships, trains, trucks, planes), utilities, meat packing and food processing plants, food storage areas, restaurants and other food handling establishments, schools, warehouses and other commercial buildings.

Active Ingredients:
O-isopropoxyphenyl methylcarbamate 1.00%
*Inert Ingredients: 99.00%
Total 100.00%

* Contains petroleum distillate

KEEP OUT OF REACH OF CHILDREN

CAUTION

Harmful if swallowed

See rear panel for additional precautions

EPA Reg. No. 9591-124 EPA Est. No. 9591-OH-2

NET CONTENTS 15 OUNCES

DIRECTIONS

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

To Operate: Hold container and spray infested surfaces only.

COCKROACHES, ANTS, CRICKETS, SOWBUGS, MILLIPEDES: Spray in all cracks, around baseboards, under furniture, and in areas where insects hide. Also spray under cabinets, refrigerators, sinks, and other areas infested with these pests. Do not spray food surfaces or household contact treated surfaces until dry.

BOOKLOUSE & SILVERFISH BEETLES: Spray baseboards, door frames, bookshelves, and other areas infested with these insects. Repeat as necessary.

GRAIN WEEVILS, FLOUR BEETLES, DRUG STORE BEETLES: Spray in hibernating stages of BOXELDER BEETLES, CLUSTER FLIES, and many insects as possible in cracks and crevices, in wall frames, under siding, in macadamia nut shells, etc. Repeat as necessary.

BROWN DOG TICKS: Thoroughly spray baseboards, window and door frames, and quarters of household pets and their coverings. Applications should be repeated as necessary and as reinfestation occurs. Repeat in animal quarters following treatment.

FLEAS, ANTS, BROWN DOG TICKS, CRICKETS, MILLIPEDES: Thoroughly spray infestations of these insects in the dwelling, spray infested areas as necessary.

WASPS & HORNETS: Outdoor infestations of these insects in the dwelling, spray infested areas at arms length and depressurize the dwelling. Repeat as necessary.

Localized treatment of wood-boring insects: CARPENTER ANTS, CARPENTER BEES, and other wood-boring insects. Apply a small amount of material to the source of infestation, in tunnels and cavities with extension tubes. Seal entrance openings with wool after spray application.

APPLICATION WITHIN FOOD ESTABLISHMENTS: Limited application of this product is permitted in food processing areas such as expansion joints between equipment, housing, junction boxes or switch boxes, and equipment legs where insects hide. Avoid depositing the product on the material into the air. Avoid contact with food processing surfaces. Any equipment and utensils in food processing areas must be washed with water before use. Equipment and utensils in food processing areas must be washed with water to remove any residue.