

9688-79

7-20-2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 20 2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Kathie J. Tryson
Director, Product Registrations
Chemsico, Div. Of United Industries Corp.
P.O. Box 15842
St. Louis, MO 63114

Subject: Amendment - Add Optional Directions for Carpenter Ants
Chemsico Tralomethrin Insecticide A
EPA Registration No. 9688-79
Your submissions dated January 12, March 16, and March 22, 2000

Dear Ms. Tryson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below. A stamped copy of the label has been enclosed for your records.

1. Under the OPTIONAL MARKETING CLAIMS section, the claim for carpenter ants should be modified to state that the use of this product will kill carpenter ants and may aide in the control of these pests. Efficacy data does not support the claim that application of this product can protect your home from invading carpenter ants. Please delete the statement "Helps protect your home from invading carpenter ants."
2. Under the PRECAUTIONARY STATEMENTS section, revise the second and third sentences to read "Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."
3. As specified in PR Notice 2000-3, the following first aid statements will be required for products placed in toxicity category III and above. You may wish to change your first aid section now to comply with this notice.

"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.

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IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or a doctor.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center 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 mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

4. Under INDOORS, revise the last two sentences of the second paragraph to read: "To control the source of flea infestations, treat your pet with a product registered for animal application. Also, treat your yard with a product registered for yard application.
5. Revise the sentence after OUTDOORS to read: "(As an aid in controlling these insects).
6. Under OUTDOORS, either delete the phrases "Repeat as necessary" and "Repeat as needed" or indicate a time period based on the residual efficacy of your product.
7. Under the OPTIONAL MARKETING CLAIMS, delete the first sentence: "Expanding foam reaches carpenter ants [insects][pests] where they hide." There is no evidence that the expanding foam will actually reach carpenter ants where they hide.
8. Under the HOW TO USE section, delete the statement "Spray heavily into areas vulnerable to attack [damage]." This is a subjective statement since you have not quantified what the term "Spray heavily" means.

The alternate confidential statement of formula (CSF) for EPA Reg No.9688-79, dated 01/12/2000 is acceptable. A copy of the CSF has been included in your product file.

Claims for cockroaches, ants, spiders, fleas, ticks and mosquitoes should be supported by existing or additional efficacy data. If these data are cited from the Aventis database, a letter of authorization and certification with respect to data form should be submitted. The MRID numbers of the cited studies should be included with your complete data matrix, including product chemistry and acute toxicity data. In addition, please provide any available synergized formulation data and any available data at very low concentrations.

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,



George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure



TRALOMETHRIN INSECTICIDE A

[Use indoors and outdoors • Water-based • No oily residue • Non-staining • Unscented • Leaves no odor

OPTIONAL PHRASES WITH FRAGRANCED FORMULA:

Fresh Floral/Scent/Perfume • Country Potpourri/Scent/Perfume •
Floral Breeze/Scent/Perfume • Spring Time Scent • Fresh Scent •
Light [Lite] Scent]

ACCEPTED
with COMMENTS
in EPA Letter Dated
MAY 20 2000
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
9688-79

Active Ingredients:

Tralomethrin	0.03%
d-trans Allethrin	0.05%
Other Ingredients	99.92%

Tralomethrin supplied under license from Aventis Environmental Science.

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for additional precautionary statements

NET WT. 11 OZ.

Optional Marketing Language & Directions For A General Use Product

OPTIONAL MARKETING LANGUAGE

[Kills [controls] roaches, ants, crickets, fleas and other listed pests • Kills on contact • Kills fast • Fast killing • Helps protect your home from invading ants • Also stops spiders, roaches, fleas, and brown dog ticks • Kills fast plus continues to kill up to 4 months • Keeps on killing • Keeps on killing with residual power for up to 4 months • Helps protect up to 4 months • Continues to kill up to 4 months • 4 month control

Chemsico Tralomethrin Insecticide A is a highly effective formulation, which kills crawling insects fast. Chemsico Tralomethrin Insecticide A stays on treated surfaces and provides residual insect killing power for up to four months [16 weeks] after the spray has dried. [Alternate statement: Chemsico Tralomethrin Insecticide A also stays on treated surfaces providing insect protection for up to 16 weeks.]



READ ENTIRE LABEL BEFORE USE.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For household use. This product is not for use on pets.*

HOW TO USE

Shake well before using. Spray surfaces until wet, moving the spray rapidly to prevent excessive wetting and waste of product. Point spray away from people, pets and plants. Do not use as a room spray.

Do not allow the spray to contact food or food contacting surfaces. Thoroughly wash dishes, utensils and counter tops with soap and water if they are sprayed with this product. Do not allow people or pets to contact treated surfaces until spray has dried. Remove pets and cover aquariums before spraying.

INDOORS

FOR SPOT TREATMENT ONLY - For control of Cockroaches, Ants, Spiders (including Black Widow Spiders), Crickets, Firebrats, Silverfish and stored product insects (including adults and larvae) such as Confused Flour Beetles, Sawtoothed Grain Beetles, Indian Meal Moths, Rice Weevils, Mediterranean Flour Moths and Red Flour Moths. Direct spray into cracks and crevices in walls, dark corners of rooms, cabinets and closets, along and behind baseboards, beneath and behind sinks, stoves, refrigerators and cabinets, around plumbing and other utility installations, around waste containers and wherever else these pests may find entrance. Residual activity lasts up to four months.

For control of Fleas and Brown Dog Ticks, spray infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and doorframes and localized areas of floor coverings where these pests may be present. Test inconspicuous sample of fabric or rug for staining before use. Old bedding of pets should be removed and cleaned or replaced with clean, fresh bedding after treatment of pet area. **Do not treat pets with this product.** To control the source of flea infestations, treat your pet with a product registered for animal application [such as . . .]. Also treat your yard with a product registered for yard application [: such as . . .].

For control of Carpet Beetles, spray along baseboards and edges of carpeting, under carpeting, rugs and furniture, in closets and on shelves and wherever else these insects are seen or suspected. Test inconspicuous sample of fabric or rug for staining before use.

NOTE: Check carpet manufacturer's warranty and care and maintenance information before using product on your specific brand of carpeting.

OUTDOORS(As an aid in reducing annoyance from these insects)

Flies, Mosquitoes - Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also spray surfaces around light fixtures on porches, in garages and other places where these insects alight or congregate. Repeat as necessary.

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Ants, Brown Dog Ticks, Crickets, Fleas and Earwigs - Thoroughly spray infested weeds or bushy non-crop areas. For ants, thoroughly wet hills and runways. Repeat as necessary.

STORAGE AND DISPOSAL

Store in cool, dry area away from heat or open flame. Securely wrap original container in several layers of newspaper and discard container in trash. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco will reduce exposure. Removing and washing contaminated clothing may reduce exposure.

First Aid

If on Skin: 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. Have the product container with you when calling a Poison Control Center or doctor, or going for treatment.

Environmental Hazards

This pesticide is toxic to fish. Do not apply directly to water.

Physical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperature above 130° F may cause bursting.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or comments? Call 800-332-5553

[Contains NO CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.]

Made in the USA by Chemsico, Division of United Industries Corporation, P.O. Box 15842, St. Louis, MO 63114-0842

EPA Reg. No. 9688-79 EPA Est. No. 9688-MO-1 © 2000

Optional Marketing Language & Directions For A Foaming Carpenter Ant Product

OPTIONAL MARKETING CLAIMS

[Kills carpenter ants • Kills carpenter ants for up to 4 months [16 weeks] • Helps protect your home from invading carpenter ants • Includes an attachable [extension] tube for localized treatment of carpenter ants • Includes an attachable [extension] tube to kill carpenter ants where they hide • Includes an attachable [extension] tube for deep wood penetration [application] • Expanding foam reaches carpenter ants [insects] [pests] where they hide • Expanding foam kills carpenter ants in their tunnels • Non-staining

Chemsico Tralomethrin Insecticide A is highly effective against carpenter ants. The foam expands to where insects hide [and eventually dissipates]. It kills [insects] fast [and keeps on killing [working against] carpenter ants for up to four months.] Spray [the foaming aerosol] into hard to reach areas, such as cracks and crevices in walls, along baseboards, around piping and anywhere insects hide. Chemsico Tralomethrin Insecticide A can be sprayed indoors as a spot treatment and outdoors on wooden surfaces.]

STOP. READ ENTIRE LABEL BEFORE USE.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For use around the home only.*



Do not use on pets. Do not allow people or pets to contact treated surfaces until dry.

HOW TO USE

For spot treatment only. Do not allow the spray to contact food or food contacting surfaces. Thoroughly wash dishes, utensils and counter tops with soap and water if they are sprayed with this product. Remove pets and cover aquariums before spraying.

SHAKE WELL BEFORE USING. Insert attachable [extension] tube into the spray button [tip] [actuator]. Spray heavily into areas vulnerable to attack [damage]. Apply evenly, avoid dripping and runoff. [This product will keep killing carpenter ants for up to four months.]

Treat infested areas and areas likely to be infested, such as wood surfaces, voids and tunnels [channels] in damaged wood, behind veneers, in structural voids, (between stud walls and spaces between wood and foundations), along cracks, and along crawl spaces.

TIPS FOR TREATING CARPENTER ANTS

1. The best way to control carpenter ants is to locate their nest and spray it directly. To help locate the nest, watch the ants to see where they go. Nests outside [outdoors] can be found in trees, old woodpiles, decks, stumps, fences and adjacent buildings.
2. Common nest sites in the home include under cabinets and dishwashers, around pipes, attics, leaky roofs and doors, wall voids and doorjams.
3. To help keep pests from entering your home, spray between cracks and crevices of screens, doors, window frames or wherever these insects may enter.

TO HELP PREVENT FUTURE INFESTATIONS [DAMAGE]:

- ✓ Treat the outside of your home's foundation and treat your yard [with products registered for these uses] [such as...].
- ✓ Trim all trees and bushes [shrubs] so that the branches do not touch the [your] house. Carpenter ants often travel into homes via [from] branches.
- ✓ Fix leaky roofs and plumbing. Carpenter ants need a moist environment to establish a colony and typically nest in softened decayed wood.
- ✓ Seal openings in living trees and remove dead trees and woodpiles - they attract carpenter ants.

For Other Indoor & Outdoor Insects [Pests]

INDOORS

For Cockroaches, Ants, Spiders (including Black Widow

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Spiders), Crickets, Firebrats, Silverfish and stored product insects (including adults and larvae) such as Confused Flour Beetles, Sawtoothed Grain Beetles, Indian Meal Moths, Rice Weevils, Mediterranean Flour Moths and Red Flour Moths - Spray into cracks, crevices, dark corners of rooms, cabinets, closets, along baseboards, around sinks, stoves, refrigerators, cabinets, plumbing and other utility installations. Also treat around waste containers and wherever else these pests are likely to be found.

OUTDOORS

For Ants, Brown Dog Ticks, Crickets, Fleas and Earwigs - Treat outside surfaces of buildings, porches, wooden decks, patios and fences, window frames, doorways, eaves, cracks in foundations and other areas where insects may crawl and hide. Thoroughly spray infested weeds or bushy non-crop areas. For ants, thoroughly wet hills and runways. Repeat as needed.

STORAGE AND DISPOSAL

Store in cool, dry area away from heat or open flame. Securely wrap original container in several layers of newspaper and discard container in trash. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco will reduce exposure. Removing and washing contaminated clothing may reduce exposure.

First Aid

If on Skin: 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. Have the product container with you when calling a Poison Control Center or doctor, or going for treatment.

Environmental Hazards

This pesticide is toxic to fish. Do not apply directly to water.

Physical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperature above 130° F may cause bursting.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or comments? Call 800-332-5553

[Contains NO CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.]

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EPA Reg. No. 9688-79

EPA Est. No. 9688-MO-1

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Optional Marketing Language & Directions for A Foaming Crack & Crevice Product

OPTIONAL MARKETING CLAIMS

[Kills [controls] roaches, ants, crickets, fleas and other listed pests • Kills on contact • Kills fast • Fast killing • Helps protect your home from invading ants • Also stops spiders, roaches, fleas, and brown dog ticks • Kills fast plus continues to kill up to 4 months • Keeps on killing • Keeps on killing with residual power for up to 4 months • Helps protect up to 4 months • Continues to kill up to 4 months • 4 month control • Includes an attachable [extension] tube to kill insects where they hide [live] • Includes an attachable [extension] tube for hard to reach places

Chemsico Tralomethrin Insecticide A is a highly effective formulation [product], which kills crawling insects fast. The foam expands to where insects live [and eventually dissipates]. It kills [insects] fast and keeps on killing [working] for up to four months [16 weeks]. Spray [the foaming aerosol] into hard to reach areas, such as cracks and crevices in walls, along baseboards, around piping and anywhere insects hide.

Chemsico Tralomethrin Insecticide A can be sprayed inside as a spot treatment or on outside surfaces.

[Chemsico Tralomethrin Insecticide A is a highly effective formulation, which kills crawling insects fast. Chemsico Tralomethrin Insecticide A stays on treated surfaces and provides residual insect killing power for up to four months [16 weeks] after the spray has dried. [Alternate statement: Chemsico Tralomethrin Insecticide A also stays on treated surfaces providing insect protection for up to 16 weeks.]

STOP. READ ENTIRE LABEL BEFORE USE.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For use around the home only.*



Do not use on pets. Do not allow people or pets to contact treated surfaces until dry.

HOW TO USE

For spot treatment only. Do not allow the spray to contact food or food contacting surfaces. Thoroughly wash dishes, utensils and counter tops with soap and water if they are sprayed with this product. Remove pets and cover aquariums before spraying.

SHAKE WELL BEFORE USING. Insert attachable [extension] tube into the spray button [tip] [actuator]. Point spray away from people, pets and plants. Apply evenly, avoid dripping and runoff.

INDOORS

For Cockroaches, Ants, Spiders (including Black Widow Spiders), Crickets, Firebrats, Silverfish and stored product insects (including adults and larvae) such as Confused Flour Beetles, Sawtoothed Grain Beetles, Indian Meal Moths, Rice Weevils, Mediterranean Flour Moths and Red Flour Moths - Spray into cracks, crevices, dark corners of rooms, cabinets, closets, along baseboards, around sinks, stoves, refrigerators, cabinets, plumbing and other utility installations. Also treat around waste containers and wherever else these pests may be found. This product will keep killing for up

to four months.

OUTDOORS

For Ants, Brown Dog Ticks, Crickets, Fleas and Earwigs -
Treat outside surfaces of buildings, porches, wooden decks, patios and fences, window frames, doorways, eaves, cracks in foundations and other areas where insect may crawl and hide. Thoroughly spray infested weeds or bushy non-crop areas. For ants, thoroughly wet hills and runways. Repeat as needed.

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STORAGE AND DISPOSAL

Store in cool, dry area away from heat or open flame. Securely wrap original container in several layers of newspaper and discard container in trash. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco will reduce exposure. Removing and washing contaminated clothing may reduce exposure.

First Aid

If on Skin: 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. Have the product container with you when calling a Poison Control Center or doctor, or going for treatment.

Environmental Hazards

This pesticide is toxic to fish. Do not apply directly to water.

Physical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperature above 130° F may cause bursting.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or comments? Call 800-332-5553

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