



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

July 20, 2001

Ms. Glenda Mah  
Chemsico Div. of United Industries Corp.  
P.O. Box 15842  
St. Louis, MO 63114-0842

Subject: Submission of Efficacy Data to Increase Residual Claims  
Chemsico Home Insect Control D  
EPA Reg. No. 9688-87  
Your application dated January 9, 2001

Dear Ms. Mah:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1) Remove the marketing phrase "For the most effective bug [insect] protection [control] all season long, use Chemsico Home Insect Control D along with [our] [other] Chemsico [home and garden] products." per 40 CFR 156.10 (a)(5).
- 2) Remove "New clear formula" or rephrase as "Clear Formula".
- 3) Delete all "Repeat treatment/Retreat as necessary" - type statements and state the minimum allowable time period between applications. This should be based on your efficacy data.
- 4) Please remove all marketing phrases representing your product as "odor free" or "no odor". As mentioned in previous assessments, many people suffer from chemical sensitivities and would not find this claim accurate. You may keep the claim "no lingering odor".

If you have any further questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

A handwritten signature in black ink that reads "George T. LaRocca". The signature is written in a cursive style with a large initial "G".

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



# Home Insect Control D

[Kills roaches • Kills fleas • Kills both adult and pre-adult (larvae) fleas • Kills fleas and their hatching eggs • Kills ticks (including ticks which transmit Lyme disease) • Helps protect your home from invading ants • Also stops spiders, roaches, fleas, and ticks • Kills on contact • Kills fast • Fast killing • Kills ticks on contact • Kills hidden bugs • Kills even hidden bugs • Kills the bugs you see and kills the bugs you don't see • Water-based • Non-staining • No oily residue • No lingering odor • Leaves no odor • No Odor • Odor Free • Use indoors and outdoors • Water-based (Non-staining, [Leaves] no odor) • Sprayer included • Ready-to-use • Economical do-it-yourself pest control • Do-it-yourself pest control • Easy to use ready spray • New Clear Formula • Fast Acting • Indoor & Outdoor Insect Killer • For residual control of nuisance pests for up to 6 months • Fast acting with residual control [for up to six months] • \*Guaranteed results[ or your money back]]

Active Ingredient:  
Tralomethrin ..... 0.03%  
Other Ingredients ..... 99.97%  
Tralomethrin supplied under license from Aventis Environmental Science USA LP

KEEP OUT OF REACH OF CHILDREN  
CAUTION See side for additional precautionary statements  
NET CONTENTS 1 GALLON

## MARKETING LANGUAGE AND DIRECTIONS FOR A GENERAL USE PRODUCT

### OPTIONAL MARKETING LANGUAGE

[Kills both adult and pre-adult (larvae) fleas for up to 8 weeks (2 months) • Kills fleas and their hatching eggs • Breaks the flea life cycle • Keeps killing • Keeps on killing • Continues to kill cockroaches (roaches) and ants for up to 24 weeks (6 months) • Protects for up to (16 weeks) (4 months) (24 weeks) (6 months) • Lasts up to (16 weeks) (4 months) 24 weeks (6 months) • Up to (4 month) (6 Month) Control

Chemsico Home Insect Control D is a highly effective formulation, which kills crawling insects fast. It stays on treated surfaces and provides [residual] insect killing power for up to four (six) months.]

[Chemsico Home Insect Control D [This product] is a highly effective formulation, which kills roaches, ants, spiders and other crawling insects [bugs] fast.] [Chemsico Home Insect Control D [This product] is specially formulated to kill bugs [pests] fast plus keeps killing up to [six] 6 months [24 weeks].] [Chemsico Home Insect Control D [This product] stays on treated surfaces providing killing power for up to six [6] months [24 weeks] after the spray has dried.] [Chemsico Home Insect Control D also stays on treated surfaces providing insect protection for up to 24 weeks.] [This product [formula] is great for indoor and outdoor insect control. It leaves no odor and is non-staining.]

Chemsico Home Insect Control D is highly effective against roaches, ants and other listed insects and kills [controls] for up to 6 months [24 weeks].] [This formula is non-staining and leaves no odor, so it's great for use indoors and outdoors.] [To kill [control] insects inside your home, spray Chemsico Home Insect Control D [this product] along baseboards in your kitchen, bathroom and other living areas. To help prevent insects from entering your home, spray outside surfaces of screens and around door and window frames.] [For the most effective bug [insect] protection [control] all season long, use Chemsico Home Insect Control D along with [our] [other] Chemsico [home and garden] products.]

## OPTIONAL PRODUCT FACT BOX

### PRODUCT FACTS

**What It Does:**  
Kills [Carpenter Ants] Ants, [cockroaches] Roaches, Fleas, Ticks, Spiders, [Crickets, Earwig, Silverfish] and Other Listed Insects  
**Where to Use:** (indoor icon) (outdoor icon)  
INDOORS: In Cracks and Crevices, along Baseboards, [ under Sinks, behind Stoves and Refrigerators and Anywhere Insects May Hide] [Wherever Pests Find Entrance]  
OUTDOORS: [On surfaces of] Outside Surfaces of Screens, Doors and Window Frames, Porches, Patios, Buildings or Wherever Insects May Enter  
**Questions & Comments:** (phone icon) (computer icon)  
Call 1-800-332-5553 or Visit our Website at [www.spectraclde.com](http://www.spectraclde.com)

[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.*

### SHAKE WELL BEFORE USING

#### [SPRAYER INSTRUCTIONS]

[How to prime and care for your sprayer:]

1. After shaking product well, remove cap from container and replace with sprayer hose and cap assembly. Tighten securely.
2. Turn sprayer nozzle one half turn counter-clockwise. Hold sprayer below the level of container and prime by pumping trigger 10 - 15 times until product is dispensed. Adjust nozzle to fine spray or jet stream as needed.
3. To store, turn nozzle to "OFF" position and [store with sprayer above level of liquid in container to prevent leakage] [store sprayer on hook located near bottle handle to prevent leakage].

ACCEPTED with COMMENTS in EPA Letter Dated

July 20, 2001

[Bracketed Text] = Optional language

6  
5

**INDOORS** (Graphic showing Indoor treatment sites.)

Spray areas where cockroaches, Palmetto bugs, ants, clover mites, crickets, firebrats, water bugs, silverfish and spiders are found or normally occur including dark corners of rooms and closets, cracks and crevices in walls; along and behind baseboards; beneath and behind sinks, stoves, refrigerators and cabinets; around plumbing and other utility installations. For ants, apply to ant trails; around doors and windows and wherever else ants may find entrance. For control of carpet beetles, thoroughly spray along baseboards and edges of carpeting, under carpeting, rugs and furniture, in closets and on shelving, and wherever else insects are seen or suspected. For control of fleas and brown dog ticks, thoroughly spray pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames and localized areas of floor and floor covering where fleas and ticks may be present. Pet bedding should be replaced with clean fresh bedding after treating the area. Do not treat pets with this product. To control the source of flea infestations, pets should be treated with a product registered for application to animals.

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

**OUTDOORS** (Graphic showing Outdoor treatment sites.)

Flies, mosquitoes: For use only as an aid in reducing annoyance from these insects. Spray outside surfaces of screens, doors, window frames or wherever insects may enter the room. Also spray surfaces around light fixtures, on porches, in garages and other places where insects alight or congregate. Repeat as needed. Ants, ticks (including ticks which transmit Lyme disease), crickets, fleas and earwigs: For treatment of infestation of these insects in areas where there are weeds or bushy non-crop areas, spray infested areas thoroughly. When treating for ticks, give special attention to areas frequented by pets. For ants, thoroughly wet hills and runways. Repeat as needed.

**PRECAUTIONS:** People and pets should not be allowed in treated areas until spray has dried.

**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.

**PRECAUTIONARY STATEMENTS****Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if inhaled. Avoid breathing vapor or spray mist. Removing and washing contaminated clothing before reuse may reduce exposure.

Avoid contamination of food, feedstuffs and domestic water supplies. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Remove pets, birds and cover fish aquariums before spraying.

**First Aid**

**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. Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

**Environmental Hazards**

This product is toxic to fish and other aquatic organisms. Do not apply directly to water.

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

**Questions or comments?** Call toll free 800-332-5553

\*If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.

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

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EPA Est. No. 9688-MO-1  
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**MARKETING LANGUAGE & DIRECTIONS  
FOR A CARPENTER ANT PRODUCT****OPTIONAL MARKETING CLAIMS**

[Kills carpenter ants • Kills carpenter ants for up to (4) (16 weeks) 6 (24 weeks) months • Up to (4) (16 weeks) 6 (24 weeks) month control • May aid in control of carpenter ants • For use around foundations, outside buildings, porches, wood piles, wooden fences, and decks ]

[Chemsico Home Insect Control D is highly effective against carpenter ants. This ready-to-use formula kills insects when they come in contact with it. Plus it keeps killing carpenter ants for up to (four) (16 weeks) six months (24 weeks) . Chemsico Home Insect Control D can be sprayed indoors as a spot treatment or 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.



People and pets should not be allowed in treated areas until spray has dried.

**HOW TO USE**

1. Remove cap from container and replace with sprayer hose and cap assembly. Tighten securely.
2. **SHAKE WELL BEFORE USING.** Turn sprayer nozzle one half turn counter-clockwise. Hold sprayer below the level of container and prime by pumping trigger 10 - 15 times until product is dispensed. Adjust nozzle to a coarse, wet spray.
3. Spray heavily into areas vulnerable to attack [damage]. Apply evenly, avoid dripping and runoff. Reapply as necessary to maintain effectiveness.
4. Treat infested areas and areas likely to be infested, such as wood surfaces, voids and tunnels [channels] in dam-

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aged wood, behind veneers, in structural voids (between stud walls and spaces between wood and foundations), along cracks, and along crawl spaces.

5. *Do not spray into electrical outlets or utilities. Do not allow people or pets to contact treated surfaces until spray has dried.*
6. To store, turn nozzle to "OFF" position and store with sprayer above level of liquid in container to prevent leakage.

## OPTIONAL CARPENTER ANT LANGUAGE

### [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 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 garage doorjamb.
3. To keep pests from entering your home, spray the outside surfaces 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 and Outdoor Insects [Pests]

### INDOORS

**For cockroaches, palmetto bugs, ants, clover mites, crickets, firebrats, waterbugs, silverfish and spiders** Spray areas where these pests are normally found such as cracks, crevices, dark corners of rooms and closets, along baseboards, around sinks, stoves, refrigerators, cabinets, plumbing and other utility installations.

**For ants**, apply to ant trails, around doors and windows and wherever else ants may find entrance.

**For carpet beetles**, thoroughly spray along baseboards, under carpeting, rugs and furniture, in closets, on shelving, and wherever else insects may be found.

**For fleas and brown dog ticks**, thoroughly spray infested areas such as pet beds and resting areas, nearby cracks, crevices, baseboards, window and door frames and localized areas of floor and floor coverings where these pests may be present. Pet bedding should be replaced with clean bedding after treating. **Do not treat pets with this product.** To control the source of infestations, treat your pet with a product registered for pet use [such as . . .]. Also treat your yard with a product registered for yard use [such as . . .].

*Note: Test inconspicuous sample of fabric or rug for staining before use. Check carpet manufacturer's warranty and care and maintenance information before using product on your specific brand of carpeting.*

### OUTDOORS

**For Ants, Ticks (Including ticks which transmit Lyme disease), 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. When treating for ticks, give special attention to areas frequented by pets. **For ants**, thoroughly wet hills and runways. Repeat as needed.

**For Flies and Mosquitoes** - Spray outside surfaces of screens, doors, and 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 gather. 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.

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

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### First Aid

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