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JUN 16 1998

Mr. William Metzger
United Industries Corp.
8825 Page Blvd.
St. Louis, MO 63114

Dear Mr. Metzger:

Subject: Updated Labeling
Real-Kill Automatic Indoor Fogger II
EPA Registration No. 478-126
Hot Shot Fogger V
EPA Registration No. 8845-123
Chemsico Tralomethrin Indoor Fogger
EPA Registration No. 9688-78
Chemsico Tralomethrin Insecticide F
EPA Registration No. 9688-119
Your Application Dated September 5, 1997

The amendment 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 indicated below prior to release for shipment of product bearing the amended labeling:

1. Revise the heading "Physical Hazards" to read "Physical or Chemical Hazards". This heading should appear on all labeling and any previously approved labeling with the incorrect heading should be corrected at the next label printing.
2. Per the upcoming final rule for total release foggers add the following statement to Physical or Chemical Hazards: "This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully."
3. Move the user statement "For Household Use Only" to the front panel.
4. Products containing permethrin were never approved for use in the food areas of food handling establishments since permethrin is classified as a category C carcinogen (possible human carcinogen). Therefore as indicated in our October 1, 1997 letter

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reinstate under Precautionary Statement or Direction for Use the statement "Do not use in commercial food handling establishments, restaurants or other areas where food is commercially prepared or processed".

5. Delete the optional claim "and their hatching eggs". This claim is only appropriate for products in combination with an IGR like methoprene.

Submit two 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 13
Insecticide Branch
Registration Division (7505C)

Enclosure



TRALOMETHRIN INSECTICIDE F

Optional Marketing Language

Kills both adult and pre-adult (larvae) fleas • Kills roaches • Kills bugs where they hide • Finds even hidden bugs • Kills fast • Fast killing • Kills on contact • Protects for up to 4 weeks • Keeps on killing • Prevents re-infestation for up to 4 weeks • This [one] can treat up to 6,000 cubic feet • Water-based • Non-staining • No odor) • No oily residue • No lingering odor • Unscented

When used as directed, it will not harm drapes, upholstery fabrics, carpeting, bedspreads, clothing, linens, furniture, walls, floor tiles, ceilings, shades or blinds.

One can treats an entire room (up to 25' x 30' with an 8' ceiling) [with an effective bug killing fog that leaves no unpleasant odor.]

Active Ingredient:
 Tralomethrin (1R,3S)[1'RS](1',2',2',2'-tetrabromoethyl)-
 2,2-dimethyl-cyclopropanecarboxylic acid
 (S)-alpha-cyano-3-phenoxybenzyl ester 0.075%
 Inert Ingredients: 99.925%
 TRALOMETHRIN supplied under license from AgrEvo Environmental Health

KEEP OUT OF REACH OF CHILDREN
CAUTION See side for additional precautionary statements
 NET WT. 6 OZ.

Kills [roaches] [cockroaches], [lions, spiders, flies, mosquitoes, silverfish, crickets, ticks and wasps.
 For use in rooms, apartments, homes, attics, basements, garages, pet sleeping areas and cabins.

STOP [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 household use only.*

TO USE THIS PRODUCT CORRECTLY

Turn off ALL ignition sources such as pilot lights (shut off gas valve), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.) Call your utility or management company if you need assistance.

DO NOT use more than one fogger per room. One can treats a room up to 25 ft. x 30 ft. with an 8 ft. ceiling

DO NOT use in small, enclosed spaces such as closets, cabinets, or under counters or tables. Do not use in a room 5 ft. x 5 ft. or smaller; instead, allow the fog to enter from other rooms.

BEFORE YOU FOG

Cover or removed exposed food, dishes and food preparation equipment. Open cabinets and doors. Shut off fans and air conditioners and turn off all ignition sources as directed above. Remove pets including birds. Cover and turn off fish tanks. Close outside doors and windows.

TO START FOGGING

1. Place several layers of newspaper or paper towels on a table, stand or in center of room. Cover waxed wood floors and waxed furniture in the immediate area surrounding the fogger. Newspapers may be used.

Graphic: Valve locking.

2. **SHAKE WELL BEFORE USING.** Till can top away from face. Press valve all the way down, hooking the catch.
3. Set can on newspaper or paper towels and leave the premises immediately. Do not reenter treated area for two hours.

AIRING OUT

After two hours, open all doors and windows, turn on air conditioner and fans and air out for 30 minutes. Re-apply every four weeks if needed.

NOTE: When treating for fleas or ticks, clean and treat pet sleeping areas. Also treat dogs and cats with a flea and tick control product registered for use on pets before allowing them to enter the treated areas. For heavy infestations or fleas in deep pile carpeting, re-apply every two to four weeks if needed.

STORAGE AND DISPOSAL
 Store in cool, dry area away from heat or open flame. Discard container in trash. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION: Harmful if absorbed through skin or if inhaled, Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Avoid contamination of food and drinking water. All food preparation surfaces and utensils should be covered during treatment or thoroughly washed before use.

First Aid - If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists. **If Inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention. **If Swallowed:** Do not induce vomiting because of aspiration hazard. Get medical attention. **If in Eyes:** Flush with plenty of water. Call a physician if irritation persists.

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 15042, St. Louis, MO 63114-0842
 EPA Reg. No. 9688-119 EPA Est. No. 9688-MO-1 © 1997

ACCEPTED with COMMENTS in EPA Letter Dated

JUN 16 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act amended for the pesticide registered under EPA Reg. No. 9688-119

[Bracketed Text] = Optional Language

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USE INSTRUCTIONS LABEL



rearranged-

TRALOMETHRIN INSECTICIDE F

Kills Both Adult and Pre-adult (Larvae) Fleas • Kills Roaches • Kills Bugs Where They Hide • Finds Even Hidden Bugs • Kills Fast • Fast Killing • Kills on Contact • Protects for up to 4 weeks • Keeps on Killing • Prevents Reinfestation for up to 4 weeks • This can treats up to 6,000 cubic feet • Water Based • Non-staining • No Oily Residue • No Odor • No lingering Odor • Unscented

Active Ingredient:
Tralomethrin (1R,3S)3[(1R,S)(1',2',2',2'-tetrabromoethyl)-2,2-dimethylcyclopropyl]carboxylic acid
(S)-alpha-cyano-3-phenoxybenzyl ester 0.075%
Inert Ingredients: 99.925%
TRALOMETHRIN supplied under license from AgrEvo Environmental Health

KEEP OUT OF REACH OF CHILDREN
CAUTION
See side panel for additional precautionary statements *deleted*

Net Wt. 6 oz.

Chemsico Tralomethrin Insecticide F
• Kills Roaches
• Kills Both Adult and Pre-adult (Larvae) Fleas
• Prevents Reinfestation for up to 4 weeks
• Water-Based (Non-Staining, No Odor)
Also kills ticks, cockroaches, flies, mosquitoes, wasps, spiders, crickets and silverfish.
For use in rooms, apartments, homes, attics, basements, campers, boats, garages, pet sleeping areas, household storage areas and cabins. *deleted areas*

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 household use only.
Preparation:

1. Cover exposed food, dishes and food preparation equipment. Open cabinets and doors to area to be treated. Do not use more than one fogger per room. DO NOT use in small, enclosed spaces such as closets, cabinets or under counters or tables. Do not use in a room 5 ft. X 5 ft. or smaller; instead, allow fog to enter from other rooms. Turn off ALL ignition sources such as pilot lights (shut off gas valve, other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.)). Call your utility or management company if you need assistance. Close outside doors and windows.

2. SHAKE WELL BEFORE USING
How to Use:
Step 1:
Place several layers of newspaper or a pad on table, stand or floor in center of room. Tilt top of can away from face (fogger sprays straight up). Press valve all the way down, hooking the catch.

Step 2:
Set fogger on newspaper or pad. Leave treated area for 2 hours.
After 2 hours, open all doors and windows, turn on air conditioners and fans and let the treated area air out for 30 minutes. Use one fogger for each 6,000 cubic feet (a room 25' x 30' with an 8' ceiling). Use additional units for remote rooms or where free flow of mist is not assured. Re-apply after two weeks if necessary. *Four*
To kill Fleas or Ticks: Remove and destroy pet's old bedding. Apply this product as for other insects. Put fresh bedding in pet's quarters after treatment. Treat dogs and cats with a registered flea and tick control

product before allowing them to enter treated area. For heavy flea infestations or for fleas in deep pile carpeting, re-apply after two weeks. *changed to two to four weeks*

STORAGE AND DISPOSAL:
Store in cool, dry area away from heat or open flame. Discard container in trash. Do not incinerate or puncture container.

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION: Harmful if absorbed through skin or if inhaled. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Avoid contamination of food and drinking water. All food preparation surfaces and utensils should be covered during treatment or thoroughly washed before use. Remove pets, birds and cover fish aquariums before spraying. *moved to Directions (Before You Fog)*

STATEMENT OF PRACTICAL TREATMENT - *changed to First aid*
If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists. If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention. If Swallowed: Do not induce vomiting because of aspiration hazard. Get medical attention. If In Eyes: Flush with plenty of water. Call a physician if irritation persists.

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, Div. of United Industries Corp., P.O. Box 15842, St. Louis, MO 63114-0842
EPA Reg. No. 9688-119
EPA Est. No. 9688-MO-1

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