

FEB 22 2007

Ms. Kathie Tryson
CHEMSICO
Division of United Industries Corp.
P.O. Box 142642
St. Louis, MO 63114

Dear Ms. Tryson:

Subject: Child Resistant Packaging
Chemsico Aerosol Insecticide PP
EPA Registration Number:9688-150
Application Dated: October 11,2006

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:

The Technical Review Branch of the Registration Division has finished its review of the toxicity studies submitted by CHEMISCO and concluded that Child Resistant Packaging is not required for this product.

In addition, remove the following marketing claims:

- Made with a botanical Insecticide
- Made with a plant based ingredient
- Kills with plant based ingredient

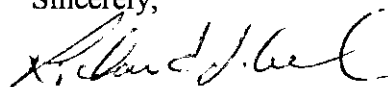
It is the Agency view that these unqualified terms, are misleading health and safety claims and therefore constitute misbranding under 2(q)(1)(A) of FIFRA. For additional guidance you may refer to PR Notice 98-10.

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If you have any question please, contact Melody Banks of my staff on 703/305-5413.

Enclosed is a copy of your label stamped with comments.

Sincerely,



Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division 505P

Chemsico

Aerosol Insecticide PP

[Fast Acting • Quickly kills insect pests on contact • Kills on contact • Kills ants, roaches, spiders, crickets, fleas, moths, flies, mosquitoes and others listed • Quick flush and knockdown of crawling and flying insects • For use as a space spray or crack & crevice application [treatment] • Made with a botanical insecticide from the chrysanthemum flower • Made with a botanical insecticide • Made with a plant based ingredient • Kills with a plant based ingredient • Water-Based • Non-staining*]

ACCEPTED
with COMMENTS
in EPA Letter Dated

FEB 22 2007

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

9688-150

Active Ingredients:	
Pyrethrins	0.3%
Piperonyl butoxide	1.5%
Other Ingredients	98.2%

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for additional precautionary statements

NET WT. 15 OZ. (426 g)

OPTIONAL MARKETING TEXT

[Chemsico Aerosol Insecticide PP is a highly effective formulation [product], which kills insects fast. Use it as a space spray to treat flying insects or as a crack and crevice spray to treat crawling insects.]

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.*

HOW TO USE

1. Shake well before using and during use.
2. Hold container upright with nozzle pointed away from you.
3. Press nozzle down and spray as directed.
4. Spray surfaces until wet, moving the spray rapidly to prevent excessive wetting and waste of product.
5. *Non-staining to most fabrics and surfaces - test on an inconspicuous area before using.

USE PRECAUTIONS

1. Do not allow people or pets to contact treated surfaces until dry.
2. Remove pets and cover fish tanks before spraying.
3. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use.
4. Exposed food should be covered or removed.

[CRAWLING INSECTS]

[For] **Cockroaches [roaches], Paimetto bugs, Waterbugs, Silverfish, Firebrats, Crickets, Pillbugs, Spiders, Centipedes and Sowbugs** – Spray into hiding places such as cracks and crevices, along baseboards, around [and behind] sinks, stoves, refrigerators, cabinets, plumbing and wherever else insects may hide or enter. Spray directly on insects where possible.

[For] **Ants** – Spray trails, nests and points of entry into buildings. Spray ants where possible.

[For] **Bedbugs** - Spray mattresses, concentrating on tufts, folds and seams. Take bed apart and spray into all joints. Also treat baseboards, moldings and floor. Allow items to thoroughly dry before use.

[For] **Fleas and Brown dog ticks** – Thoroughly spray pet bedding and other resting areas. Spray nearby cracks, crevices, and baseboards. Treat the entire inside surfaces of doghouses and kennels. Make sure items are completely dry before using.

[To control the source of infestations, treat pets with a product registered for pet use. Also treat yards with a product registered for yard use.] **Do not use on pets.**

[For] **Confused flour beetles, Sawtoothed Grain beetles, Granary weevils, Rice weevils, Red flour beetles and Grain mites** – Spray into cracks and crevices, around cartons, containers, and wherever else insects may hide. Spray 30 seconds for each 100 square feet of surface. Also directly spray insects where possible. Keep area closed for 45 – 60 minutes after treating.

[FLYING INSECTS]

[For] **Flies, Mosquitoes, Gnats, Midges, Wasps, Hornets and Flying moths (millers)** - Close all doors and windows. Spray with a slow sweeping motion at the rate of 1 - 3 seconds per 1,000 cubic feet. Direct spray to all parts of the room, especially windows and other light sources, which attract insects. Keep room closed for 10 – 15 minutes after spraying.

Indian meal moths and Angoumois grain moths - Close all doors and windows. Spray 7 to 10 seconds for every 1,000 cubic feet. Use a sweeping motion and direct spray to all parts of the area, especially around stored food product containers, pallets and darkened areas. Give special attention to windows and other light sources, which attract insects. Keep area closed for 15 minutes after spraying.

OPTIONAL MARKETING LANGUAGE AND DIRECTIONS FOR A PRODUCT WITH AN EXTENSION TUBE

[Includes an attachable [extension] tube to kill insects where they hide [live] • Includes an attachable [extension] tube for hard to reach places]

[Chemsico Aerosol Insecticide PP is a highly effective formulation [product], which kills crawling insects fast. Spray into hard to reach areas, such as cracks and crevices in walls, along baseboards, around piping and anywhere insects hide.]

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.*

HOW TO USE

1. Shake well before using and during use.
2. Hold container upright with nozzle pointed away from you.
3. Press nozzle down and spray as directed.
4. Spray surfaces until wet, moving the spray rapidly to prevent excessive wetting and waste of product.
5. *Non-staining to most fabrics and surfaces - test on an inconspicuous area before using.

USE PRECAUTIONS

1. Do not allow people or pets to contact treated surfaces until dry.
2. Remove pets and cover fish tanks before spraying.
3. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use.
4. Exposed food should be covered or removed.

[CRAWLING INSECTS]

[For] **Cockroaches [roaches], Palmetto bugs, Waterbugs, Silverfish, Firebrats, Crickets, Pillbugs, Spiders, Centipedes and Sowbugs** – Spray into hiding places such as cracks and crevices, along baseboards, around [and behind] sinks, stoves, refrigerators, cabinets, plumbing and wherever else insects may hide or enter. Spray directly on insects where possible. When spraying into hard to reach areas, such as cracks, crevices, baseboards, and around piping where insects hide, use the attachable [extension] tube. To use the attachable [extension] tube, simply insert it into the spray button [tip] [actuator].

[For] **Ants** – Spray trails, nests and points of entry into buildings. Spray ants where possible.

[For] **Bedbugs** - Spray mattresses, concentrating on tufts, folds and seams. Take bed apart and spray into all joints. Also treat baseboards, moldings and floor. Allow items to thoroughly dry before use.

[For] **Fleas and Brown dog ticks** – Thoroughly spray pet bedding and other resting areas. Spray nearby cracks, crevices, and baseboards. Treat the entire inside surfaces of doghouses and kennels. Make sure items are completely dry before using.

[To control the source of infestations, treat pets with a product registered for pet use. Also treat yards with a product registered for yard use.] **Do not use on pets.**

[For] **Confused flour beetles, Sawtoothed Grain beetles, Granary weevils, Rice weevils, Red flour beetles and Grain mites** – Spray into cracks and crevices, around cartons, containers, and wherever else insects may hide. Spray 30 seconds for each 100 square feet of surface. Also directly spray insects where possible. Keep area closed for 45 – 60 minutes after treating.

[FLYING INSECTS]

[For] **Flies, Mosquitoes, Gnats, Midges, Wasps, Hornets and Flying moths (millers)** - Close all doors and windows. Spray with a slow sweeping motion at the rate of 1 - 3 seconds per 1,000 cubic feet. Direct spray to all parts of the room, especially windows and other light sources, which attract insects. Keep room closed for 10 – 15 minutes after spraying.

Indian meal moths and Angoumois grain moths - Close all doors and windows. Spray 7 to 10 seconds for every 1,000 cubic feet. Use a sweeping motion and direct spray to all parts of the area, especially around stored food product containers, pallets and darkened areas. Give special attention to windows and other light sources, which attract insects. Keep area closed for 15 minutes after spraying.

STORAGE AND DISPOSAL

Storage: Store in a cool area away from heat or open flame. **Disposal:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency [or 1-800-CLEANUP] for disposal instructions.

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

CAUTION: Wash thoroughly with soap and water after handling.

First Aid

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

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.

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

Questions or comments? Call 1-800-332-5553

[***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.]

[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 142642
St. Louis, MO 63114-0642

EPA Reg. No. 9688-150

EPA Est. No. 9688-MO-1

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OPTIONAL DIRECTIONS FOR A WASP & HORNET PRODUCT

[Kills on contact · Water-based · **Non-staining · No oily residue · Long lasting
***Guaranteed Results or Your Money Back]

OPTIONAL FACT BOX**PRODUCT FACTS****What it Does:**

Kills Wasps, Hornets, Yellow Jackets, Scorpions

Where to Use: (icon outdoor)

Outdoors Where Insects Live and Breed

Questions & Comments: (icon phone and icon computer)

Call 1-800-332-5553 or visit our Website at www.spectracide.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. **Never use indoors.**

OPTION 1 - PARAGRAPH FORM

SHAKE WELL BEFORE EACH USE. Aim spray away from person. Push button to spray. If it's windy, stand with the wind at your back to avoid spray drift.

WASPS, HORNETS AND YELLOW JACKETS:

Application should be made in late evening when insects are least active. Spray liberally, soaking the nest. Chemsico's powerful spray will also kill insects that return to the nest over the next few days. Wait at least 24 hours before removing the nest.

OTHER PESTS:

Scorpions: Stand at a safe distance and spray to cover the scorpion.

Do not use this product in or on electrical equipment due to possibility of shock hazard.

****This product is non-staining to most home siding depending on age and cleanliness. Before using in areas where the spray may contact home siding, test in an inconspicuous area and recheck in a few hours.**

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OPTION 2 – SIMPLIFIED DIRECTIONS

1. Apply at sunset when insects are least active (graphic-sunset)
2. Stand a safe distance from the nest. Don't stand directly underneath.
3. Shake can well before each use. Aim spray away from person. Push button to spray. (graphic-hand w/can)
4. Spray the nest until soaked. (graphic-nest). Chemsico's powerful spray will also kill insects that return to the nest over the next few days.
5. Wait at least 24 hours before removing the nest.
6. **Scorpions:** Stand at a safe distance and spray to cover the scorpion.

***This product is non-staining to most home siding depending on age and cleanliness. Before using in areas where the spray may contact home siding, test in an inconspicuous area and recheck in a few hours.*

USE TIPS

- If it's windy, stand with the wind at your back to avoid spray drift.
- Do not use this product in or on electrical equipment due to possibility of shock hazard.

STORAGE AND DISPOSAL

Storage: Store in a cool area away from heat or open flame. **Disposal:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or [1-800-CLEANUP] for disposal instructions.

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

CAUTION: Wash thoroughly with soap and water after handling.

First Aid

Have the product container or label 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 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.

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

Questions or comments? Call 1-800-332-5553

[***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.]

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

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