



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 2, 2001

Ms. Kathie J. Tryson
Chemsico Div. of United Industries Corp.
P.O. Box 15842
St. Louis, MO 63114

Subject: Amendment to Add Non-Flammable Claim to Label
Chemsico Insecticide NT
EPA Reg. No. 9688-159
Your application dated August 23, 2000

Dear Ms. Tryson:

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) Your basic CSF has been approved. However, the data requirements for corrosion characteristics (830.6320) and viscosity (830.7100) are data gaps and remain unsatisfied. Please submit this information with your final printed labeling.
- 2) You may keep your "NEW!" claims on your label only for a period of 6 months from the date of this letter since you have a new formulation.
- 3) Please remove your "Leaves no odor" claim. As we mentioned in our previous correspondence many people suffer from chemical sensitivities and would not find this claim accurate.
- 4) While we will allow the "non-flammable" claim, you must delete the front panel marketing statements of "Non-flammable", "Non-flammable dry fogger", "Non-

flammable dry fogger-no need to extinguish pilot lights”, and “Contains a non-flammable propellant” since we consider such highlighted statements as implied safety claims. The term “Non-flammable” can appear as a sub-statement to the ingredient statement, or on a back or side panel. The phrase must not be highlighted or emphasized (such as inordinately large type size or contrasting color) so as to constitute a misleading safety claim.

- 5) Please add the following underneath your First Aid Statement per PR Notice 2001-1 (we regret that we missed this in our previous correspondence:)

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

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

Sincerely,

Macy Lynn Keigwin
for George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)



Insecticide NT

For indoor household use only

[New! • Kills both adult and pre-adult (larvae) fleas • Kills fleas • Kills fleas and their hatching eggs • Kills roaches • Kills roaches, fleas, spiders, ants and other listed [household pests] • Kills bugs where they hide • Finds even hidden bugs • Kills hidden bugs • Deep reaching fog penetrates cracks & crevices [where bugs hide] • Deeper reaching [dry fog] formula • Deep reach [fogger] • Kills fast • Fast killing • Kills on contact • One [each] can treats up to 6,000 cubic feet • Non-staining • Low odor • No oily residue • No lingering odor • Leaves no odor • Unscented • [New] Dry-fog technology • Leaves no mess • No-mess [fogger] [technology] • Fogging made easy • Non-flammable • Non-flammable dry-fogger • Non-flammable formula – no need to extinguish pilot lights • Contains a non-flammable propellant]

Active Ingredients:

Tetramethrin	0.2%
Permethrin	0.5%
Piperonyl butoxide	1.0%
Other Ingredients	98.3%

KEEP OUT OF REACH OF CHILDREN

CAUTION See back for additional precautionary statements

NET WT. 6 OZ. [170 g]

OPTIONAL MARKETING LANGUAGE

[Chemsico Insecticide NT's new dry-fog technology creates a deep reaching fog that penetrates cracks and crevices killing bugs where they hide. This new technology also makes fogging easier because there's no mess to clean up after returning home. When used as directed, it will not harm drapes, upholstery fabrics, carpeting, bedspreads, clothing, linens, furniture, walls, floor tiles, ceilings, shades or blinds.]

[Kills ants, cockroaches [roaches], fleas [adult, pre-adult (larvae)], spiders, flies, mosquitoes, silverfish, waterbugs, crickets, ticks, palmetto bugs, and wasps.]

For use in apartments, homes, cabins, attics, basements, rooms, garages, and pet sleeping areas.

One can treats an entire room (up to 25' x 30' with an 8' ceiling)(with an effective bug killing fog)]

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.

BEFORE YOU FOG

Cover or remove exposed food, dishes and food preparation equipment. Open cabinets and doors. Shut off fans and air conditioners. Remove pets including birds. Cover and turn off fish tanks. Close outside doors and windows.

TO START FOGGING

- 1. SHAKE WELL BEFORE USING.** Tilt can top away from face. Press valve all the way down, hooking the catch. Do not inhale the spray mist.
- 2. Set can in center of room and leave the premises immediately.** Do not re-enter area for one hour.

AIRING OUT

After one hour, open all doors and windows; turn on air conditioner and fans, and air out for 30 minutes. Re-apply in 2 to 4 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.

Storage and Disposal

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with skin or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

First Aid

IF SWALLOWED: Call a Poison Control Center or doctor immediately for treatment advice. Have 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 doctor.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a Poison Control Center or doctor for treatment advice.

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 800-332-5553 or visit our web site at www...

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

EPA Reg. No. 9688-159

EPA Est. No. 9688-MO-1 ©2000

ACCEPTED
with COMMENTS
in EPA Lower Detail

MAR - 2 2001

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this product is registered under EPA Reg. No. 9688-159

9688-159