

9688-193

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115

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 9 2004

Ms. Kathie Tryson
Chemsico
United Industries Corporation
PO Box 142642
St. Louis, MO 63114

Dear Ms. Tryson:

Subject: Label amendment
Chemsico Roach Control I
EPA File Symbol 9688-193
Your submission dated Sept. 15, 2003

The label amendment to indicate quick kill and kills in (24) hours, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) as amended, is acceptable subject to the comments listed below:

1. Submitted data supports a quick kill claim only against the most common species of cockroach, the German cockroach. Therefore, add a statement to the label indicating that all quick kill, kills within hours, or kills within 24-hours claims are for the German or small cockroach.
2. Please submit an efficacy study on a large species of cockroach, the American cockroach. Upon submission and review of acceptable efficacy data for the large or American cockroach, you can remove the statement required above.
3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. A copy of the efficacy review is also enclosed for your perusal. If you have any questions, please call me at (703) 308-8291.

Sincerely,



Rita Kumar
Senior Regulatory Specialist
Insecticide-Rodenticide Branch
Registration Division (7505C)
E-mail: kumar.rita@epa.gov

Enclosure

MASTER LABEL:

This Master Label contains optional marketing phrases and other statements that are applicable to different sizes and alternate brand names of this product.

CHEMSICO

Roach Control I

For indoor household use only.

Kills roaches for up to 3 months • Lasts for up to 3 Months • Kills [both] small and large roaches • Contains [12] [18] [24] Child-Resistant Bait Stations • Contains [12] [18] [24] baits • Nothing to Activate • Easy To Use • No Clean-Up • Leaves no mess • Kills roaches where they breed • Kills roaches you see • Kills [hidden] roaches [you don't see] • Kills roaches that eat the bait • Kills [tough] [hard] to find roaches [behind walls] [you can't see] • Keeps on Killing for up to 3 months • Kills common [household] roaches • Works on Common Household Roaches • Use in kitchens and baths • Use near walls, in closets and cabinets, under sinks and refrigerators] • Quick Kill Formula • Kills In Hours • Kills in 24 Hours • Works in 24 Hours

Active Ingredient:
Indoxacarb 0.10%
Other Ingredients: 99.90%

Do Not Allow Children or Pets to Play with the Bait Stations

CAUTION See back for additional precautionary statements

CONTAINS **12** — 0.07 oz. Bait Stations

TOTAL NET WT. 0.84 oz. (23.8g)

[Bracketed Text] = Optional Language

CARTON

Optional Marketing Language

[Chemsico Roach Control I kills roaches that enter the station and eat the bait. The active ingredient is also carried back to the nest, where it will kill roaches you do not see.

- Roaches eat bait, then return to where they breed, carrying the active ingredient with them.
- Roaches die.

[Roaches eat the bait and return to [where they breed] [the nest]. The roaches die leaving a killing residual for the remaining roaches to consume.] [They eat the bait and crawl away to die.] [Guaranteed to work or your money back.]

- [(graphic) **Roaches enter bait station** and eat the bait.
- [(graphic) **Roaches take the bait back to the nest.**
- [(graphic) **Roaches share the bait, killing other roaches and destroying the nest!**

OPTION A LABEL FORMAT

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.

1. Break bait apart from plastic frame before using.
[Alternate: Open pouch and break bait stations apart from each other.]
2. Place bait where you have seen roaches or in out-of-the-way places near walls, in cabinets, under sinks and refrigerators and in closets. Use at least 10 bait stations in the kitchen and 2 in each bathroom. Heavily infested areas may require additional baits.

[Alternate: Place bait stations where roaches have been seen or in out-of-the-way places near walls, in cabinets, under sinks and refrigerators and in closets. Recommended locations: Use at least 10 bait stations in the kitchen and at

ACCEPTED
EPA Letter Dated
APR 9 2004
the Federal Insecticide

9688-193

3/5

least 2 in each bathroom. Heavily infested areas may require additional bait stations. To apply to vertical surfaces, use the stick-up tape provided.]

- For continued control replace baits every 3 months, sooner if infestation is heavy.

[Alternate: Replace baits every three months for continued control or sooner if infestation is heavy.]

STORAGE AND DISPOSAL

Storage: Store in a cool, dry place inaccessible to children and pets. **Disposal: If empty:** Do not reuse this container. 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 bait stations.

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

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

[**Satisfaction Guarantee:** If you are not completely satisfied with this product, send the proof of purchase and your name, address and original cash register receipt showing price, date and place of purchase for full refund to: Chemsico, P.O. Box 142642, St. Louis, MO 63114-0642]

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OPTION B SIMPLIFIED LABEL FORMAT

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.

Diagram of rooms with bait placement arrows in out of the way locations, near walls, in cabinets, under sinks and refrigerators and in closets.

- Use all [12] [18] [24] baits. Break baits apart. Place all baits where roaches are found as shown in the diagram. [Use enclosed stickers as needed.]
- Do not use sprays around baits. Sprays contaminate baits and reduce effectiveness.
- Replace all baits every 3 months or sooner if roaches return.

STORAGE AND DISPOSAL

Storage: Store in a cool, dry place inaccessible to children and pets. **Disposal: If empty:** Do not reuse this container. 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 bait stations.

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BAIT STICKER

[To apply to vertical surface use the stick-up tape provided.] See outer carton for complete directions and precautions.

CHEMSICO ROACH CONTROL I

Active Ingredient:
Indoxacarb 0.10%
Other Ingredients: 99.90%

Do Not Allow Children or Pets to Play with the Bait Stations

CAUTION: Wash thoroughly with soap and water after handling bait stations.

NET WT. 0.07 OZ. (1.98g)

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