

9688-229

12/13/2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC 13 2006

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. William H. Metzger
Chemsico/United Industries Corp.
P.O. Box 142642
St. Louis, MO 63114-0642

Subject: Label Amendment to Add Residual and Market Claims

EPA Registration No. 9688-229
Chemsico Home Insect Killer L
Your submission dated July 24, 2006

Dear Mr. Metzger:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided you revise the label according 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.

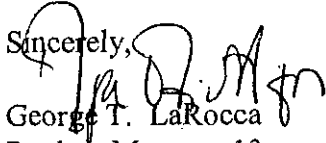
The Agency reevaluated the data cited in support of the desired claims and concluded that only one of the four studies, MRID 4655804, is pertinent to the residual claim on "non-porous surfaces." The study supports a claim of "up to 5 months control on non-porous surfaces" for German cockroaches only, and a claim of "up to 7 months control on non-porous surfaces" for crickets (not a pest of public health concern). A copy of the Efficacy Review Memo is enclosed for your records.

1. Residual claims are acceptable only for "up to 5 months control on non-porous surfaces for German cockroaches" and "up to 7 months control on non-porous surfaces for crickets."
2. Kill claims, without any residual claims, are acceptable only for
 - o Ants (with the exception of Fire, Harvester, and Pharaoh's Ants)
 - o Cockroaches
 - o Fleas

- Mosquitoes
 - Spiders (with the exception of Black Widow and Brown Recluse spiders)
 - Crickets
 - Earwigs
 - Silverfish
 - Firebrats
 - Other pests, NOT of public health importance
3. The following claims are NOT acceptable
- “[kills] and keeps on killing”
 - “protects”
 - “continues to kill”
 - “keeps killing [up to]”
 - “kills up to...”
 - “works up to”
 - “controls”
 - “control indoors on non-porous surfaces”
 - “Lasts up to”
 - “Up to...control”
 - Any other residual claims

Please note that storage stability and corrosion characteristics data are still outstanding. You must generate and submit these data.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,

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

Enclosures

Chemsico

Home Insect Killer L

[Kills roaches • Kills fleas • Helps protect your home from invading ants • Also stops spiders, roaches and fleas • Kills on contact • Kills fast • Fast killing • Kills [even] hidden bugs • Kills the bugs you see and kills the bugs you don't see • Kills roaches, ants and spiders • Kills home invading pests [insects] • Use indoors and outdoors • Sprayer included • Ready-to-use • Easy to use ready spray • Clear Formula • Clear Formula – Non-staining, No odor • Non-Staining Clear Formula • No Odor Clear Formula • Fast Acting • Indoor & Outdoor Insect Killer • No lingering odor • No oily residue • Unscented • Leaves no odor • No Odor • Odor Free • Non-Staining • Water-based • Water-based (Non-staining, [Leaves] no odor) • Non-staining formula that leaves no odor • **Guaranteed results [or your money back] • For use around foundations, outside buildings, porches, wood piles, wooden fences, and decks • Kills on Contact] Kills on Contact [and] [plus] [Keeps [On] Killing] [for up to 2, 3, 4, 5 months on non-porous surfaces indoors] • [Protects] [Continues to kill] up to 2, 3, 4, 5 months on non-porous surfaces indoors • Keeps killing up to [2, 3, 4, 5 months on non-porous surfaces indoors] • Works up to 2, 3, 4, 5 months on non-porous surfaces indoors • [Kills] [controls] [roaches] [cockroaches] [ants] [carpenter ants] [crickets] [up to 2, 3, 4, 5 months on non-porous surfaces indoors] • Keeps killing [controlling] ants (including carpenter ants) for up to 7 months on non-porous surfaces indoors • Up to [2, 3, 4, 5 months] Control indoors on non-porous surfaces

Active Ingredient:
 Lambda-Cyhalothrin0.01%
 Other Ingredients 99.99%

KEEP OUT OF REACH OF CHILDREN
CAUTION. See side [back] for additional precautionary statements.

NET [CONTENTS] 1 GALLON (3.7L)

[Bracketed Text] = Optional language

MARKETING LANGUAGE AND DIRECTIONS FOR A GENERAL USE PRODUCT

OPTIONAL MARKETING LANGUAGE

[Chemsico Home Insect Killer L [This product] is an effective formulation, which kills roaches, ants and other crawling insects [bugs] fast.] [This product [formula] is great for killing indoor and outdoor insects. It leaves no odor and is non-staining.]

[This formula is non-staining and leaves no odor, so it's great for use indoors and outdoors.] [To kill insects inside your home, spray Chemsico Home Insect Killer L [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.]

Keeps killing • Keeps on killing • Continues to kill cockroaches [roaches] and ants indoors for up to [20] weeks [5] months] * • Protects for up to [8, 12, 16, 20] weeks [2, 3, 4, 5 months] indoors * • Lasts up to [16,20] weeks [4, 5 months] indoors * • Up to [2, 3, 4, 5] month Indoor Control] *

[Chemsico Home Insect Control L [This product] is an effective formulation, which kills roaches, ants and other crawling insects [bugs] fast.] [Chemsico Home Insect Control L [This product] is specially formulated to kill bugs [pests] fast plus keeps killing up to [2, 3, 4, 5] months [8, 12, 16, 20 weeks] indoors. *] [Chemsico Home Insect Control L [This product] stays on treated surfaces providing killing power for up to five [5] months [20 weeks] indoors after the spray has dried *.] [Chemsico Home Insect Control L also stays on treated surfaces providing insect protection for up to [20] weeks indoors *.] [This product [formula] is great for indoor and outdoor insect control. It leaves no odor and is non-staining.]

[Chemsico Home Insect Control L is effective against roaches, ants and other listed insects and kills [controls] for up to 5 months [20 weeks] indoors *.] [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 L [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.]

* on non-porous surfaces.

ACCEPTED
with COMMENTS
In EPA Letter Dated
 DEC 13 2006
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
 9688-229

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[OPTIONAL PRODUCT FACT BOX]

PRODUCT FACTS

What It Does:

Kills [Carpenter Ants] Ants, [cockroaches] Roaches, Fleas, Spiders, [Crickets, Earwigs, 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.xxx.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.*



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

[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].
4. 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.

[OPTIONAL DIRECTIONS FOR TRIGGER SPRAYER PRODUCT]

[Bracketed Text] = Optional language

HOW TO USE

1. Shake well before each use. .
2. Adjust nozzle to narrow fan spray, to prevent excessive wetting and waste of product. Spray just enough to cover area to be treated.
3. 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.

INDOORS [Graphic showing Indoor treatment sites.]

Spray areas where **cockroaches, Palmetto bugs, ants*, clover mites, crickets, cigarette beetles, confused flour beetles, red flour beetles, rice weevils, saw-toothed grain beetles, dermestid beetles, firebrats, water bugs, silverfish, earwigs, box elder bugs, centipedes, millipedes, pillbugs, sowbugs, 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. Reapply after three weeks if necessary. **Pillbugs, sowbugs, and spiders** must be sprayed directly to be killed.

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

*Argentine, Southern, Field, Allegheny Mound, Florida Carpenter, Black Carpenter, Cornfield, Honey, Pavement, Nuisance

To kill 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.

To kill fleas, 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 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: 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 [Graphic showing Outdoor treatment sites.]

Ants*, 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 fleas, give special attention to areas frequented by pets. For ants, thoroughly wet hills and runways.

*Argentine, Southern, Field, Allegheny Mound, Florida Carpenter, Black Carpenter, Cornfield, Honey, Pavement, Nuisance

ALTERNATE MARKETING LANGUAGE & DIRECTIONS

INDOORS [Graphic showing Indoor treatment sites.]

Spray areas where **cockroaches, Palmetto bugs, ants, crickets, 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. Repeat application after eight weeks or earlier if re-infestation occurs. **For ants**, apply to ant trails, around doors and windows and wherever else ants may find entrance.

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.

Ants, 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 fleas, give special attention to areas frequented by pets. For ants, thoroughly wet hills and runways.

[Note: Following appears on both types of products]

STORAGE AND DISPOSAL

Storage: Store in cool dry area away from heat or open flame.

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. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

FIRST AID

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for 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 1-800-332-5553][or visit our website.]

[**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 142642
St. Louis, MO 63114-0642

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