

JUN 21 1991

Mr. Howard Rapps
Rite-Off Inc.
1545 Fifth Industrial Ct.
Bay Shore, NY 11706

Subject: Label Submission
Rite-Off Industrial Concentrate Insecticide
EPA Registration No. 9852-27
Submission Dated July 2, 1990

Dear Mr. Rapps:

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. Five copies of the finished label must be submitted prior to releasing the product for shipment.

1. Delete the Deodorized Kerosene ingredient and it's percentage from the Active Ingredient Statement and add it's percentage to the Inert Ingredient percentage total. Retain Petroleum Distillates as a substatement to the ingredient statement.
2. Add the Heading, Subheadings, and appropriate comments as seen below, preceding the HUMAN HAZARD STATEMENT.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
CAUTION**

It is not required that you highlight HARMFUL IF SWALLOWED, although we do not object if you do so.

3. Put the electrical hazard comment under the HAZARD TO HUMANS AND DOMESTIC ANIMALS heading, CHEMICAL HAZARDS statement.

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4. Revise the Storage And Disposal section to be consistent with PR Notices 83-3 and 84-1. Several of the current statements are inconsistent with use of a pressurized container.
5. Expand the reference to ventilating rooms to include- in hospitals, remove patients before treating. Ventilate rooms for 2 hours before returning patients.

The formula dated May 4, 1988 is acceptable and has been included in our files. It is understood that the use of Methylene Chloride in this formulation is no longer consistent with the terms of it's registration.

Sincerely,

Rfm
Richard F. Mountfort
Product Manager (10)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

PM 10

9852-27

SPECIMEN

DO NOT USE THIS PRODUCT IN OR ON ELECTRICAL EQUIPMENT DUE TO THE POSSIBILITY OF SHOCK HAZARD.

Hold container upright with nozzle away from you. Press valve down and spray as directed. Keep nozzle at least 36 inches from surfaces or fabrics to avoid possible staining. Remove pets, birds and cover fish aquariums before spraying.

Flies, Mosquitoes, Gnats, Wasps and Small Flying Bees: Close all doors and windows and fill the room with mist. Direct spray to all parts of room, especially windows and other light sources which attract these insects. Keep nozzle in constant motion. Keep room closed for 10 to 15 minutes after treatment. Repeat treatment as necessary.

Beetles, Water Bugs, Silverfish, Crickets, Spiders, Centipedes and Saw Flies: Spray into hiding places such as cracks and crevices, behind drapes, cabinets, along baseboards and floors, around drains and plumbing, hiding insects with spray whenever possible. Repeat treatment as necessary.

Ants - Carpet Beetles: Spray walls, nests and points of entry. Spray on ants where possible. Repeat as necessary.

Indian Meal Moth, Angoumois Grain Moth: Close doors and windows, direct spray into all parts of room, especially around stored food product containers, pallets and damaged areas. Spray 7 to 10 seconds for each 1,000 cubic feet of space. Keep area closed for 15 minutes following treatment. Repeat application weekly or as needed.

Flies, Weevils, Granary Weevil and Grain Mites: Spray into cracks and crevices, processing and handling equipment, around cartons or containers and other areas where these insects tend to congregate. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. Repeat applications as necessary.

Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves and carpets. Repeat treatment as necessary.

Bedbugs: Spray mattresses, particularly around tufts and seams. Take beds apart and spray into all joints. Treat baseboards, moldings and floors. Repeat treatment as necessary.

Flies: Spray sleeping quarters, bedding, floor and floor covering where pets are kept. Repeat as necessary. Use only a recommended pet spray on pets.

HAZARDS TO HUMANS - CAUTION

HARMFUL IF SWALLOWED: Avoid contamination of feed and foodstuffs. Vacate premises after treatment and ventilate before reoccupying. Avoid inhalation of spray mist. Avoid contact with skin and eyes.

When using the product in food processing plants, foods should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. When using this product in these areas, apply only when facility is not in operation.

CHEMICAL HAZARDS: Contents under pressure. Do not puncture. Do not expose container to temperatures above 120° F. Never throw container into fire or incinerator. Do not use or store near heat or open flame.

STORAGE & DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Pesticide waste is toxic. Improper disposal of excess pesticide, spray mixture, or residue is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Replace cap and discard containers in trash. Do not incinerate or puncture.

RITE OFF INC.

1545 5th Industrial Ct
Bay Shore NY 11706
Product number 812

RITE OFF

Industrial Concentrate Insecticide

Provides Rapid Control of Flies, Mosquitos, Gnats, Small Flying Moths (Millers) and accessible structures. Roaches, Ants, Water Bugs, Silverfish, Grain Mites, Spiders

Industrial Strength Low Dosage Required

For use in schools, hospitals, institutions, dairies, supermarkets, hotels; restaurants, drive-ins, motels, drug stores, food and animal quarters.

ACTIVE INGREDIENTS:

Pyrethrins 0
Piperonyl Butoxide, Technical* 4
Deodorized Kerosene 15
INERT INGREDIENTS 80

*Equivalent to 3.2% of (butylcarbityl) (6-propylpiperonyl ether and to 0.8% of related compounds.

CONTAINS PETROLEUM DISTILLATE

NET WT. 12 OZ.

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EPA EST. NO. 9852-N.Y.-1

CAUTION:
KEEP OUT OF REACH OF CHILDREN
(See Back Panel For Additional Cautions.)

BEST AVAILABLE COPY