

FEB 24 1995

Ms. Janet K. Jones
3M Animal Care Products
3m Center, Building 270-2N-03
St. Paul, Minnesota 55144-1000

Dear Ms. Jones:

Subject: Label Revisions, Amended CSF
Duratrol™ Yard Spray Concentrate
EPA Registration No. 10350-12
Your Submissions Dated November 18, 1994 and
January 18, 1995

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.

1. The front panel statement, "No messy mixing or measuring" is not appropriate for the directions for use on yards, in kennels and dog houses, or for fire ant treatments. We understand that this statement is intended to be used only with a particular formulator's product which is sold strictly in a hose end sprayer and whose labeling does not include these directions. Therefore, this statement must appear as "optional" on the master label, by enclosing it in parentheses, and it may not be included on any label which carries the directions for yard treatments, etc.

2. The instructions for perimeter treatments, localized sprays, and treatments for scorpions do not specify type of sprayer or mixing instructions, therefore, they must directly precede the hose end sprayer information. We understand that these sites are intended for the distributor's product which will be sold and used strictly with a hose end sprayer, thus requiring no other type of application equipment.

3. Since one of your distributors markets this product in a hose end sprayer, which cannot be opened or accessed at all by the consumer, the instruction to triple rinse the container in the Storage and Disposal section is not appropriate. Please revise the container disposal section by creating two sets of directions, one which includes "triple rinse" and another for the

2911

hose end sprayer which cannot be opened. Your distributor may market the product without the "triple rinse" container instructions, but both sets of instructions should appear on the master label.

Please make the revisions we have noted, and submit five copies of revised final printed labeling, amended to also include the claims accepted with our February 3, 1995 letter. A stamped copy of the label included in this submission is enclosed for your records.

We have also reviewed the Confidential Statement of Formula (CSF), dated January 18, 1995. The CSF has been revised to reflect the new producer, add the appropriate CAS numbers, update the supplier information, and document the certified limits, calculated according to the nominal method. The CSF is acceptable and has been added to our file for this product.

Sincerely,

DHE

Dennis H. Edwards, Jr.
Product Manager 19
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

39 11

MASTER LABEL
Front Panel

DURATROL™ YARD SPRAY CONCENTRATE

BEST AVAILABLE COPY

Contains Microencapsulated Dursban®
Insecticide for residual control of fleas and ticks on lawns,
concrete and kennels.

ACTIVE INGREDIENT:

Chlorpyrifos: 0,0,-diethyl 0-(3,5,6-trichloro-
2-pyridyl)-phosphorothioate.....1.70%

INERT INGREDIENTS:.....98.30%

TIMED RELEASE

Kills Adult and Pre-Adult Fleas

[Kills Fleas Dead Plus Kills Hatching Eggs]

- Home Foundation Insecticide
- Ready to Use...Simply attach to a garden hose and spray!
- Unique microencapsulated Dursban® puts a shield on your home's masonry foundation to prevent insects from invading
- Stops and kills over 20 problem insects (see list on back panel)
- Provides protection for up to 4 weeks, even if it rains
- No messy mixing or measuring required

EPA Reg. No. 10350-12
EPA Est. (G)54487-GA-1
EPA Est. (L) 6175-LA-1

Lot number prefix (G) or (L)
indicates appropriate establishment
number.

Net Contents: 30 fl. oz. (887 ml)

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements

11/18/94

with CONFIDENTIALITY
in EPA Letter Dated

FEB 24 1995

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
amended for the protection
intended under EPA Reg. No.
10350-12

4) 11

**PRECAUTIONARY STATEMENTS:
CAUTION**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

May be harmful if swallowed. Avoid breathing spray mist. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Avoid contamination of feed and food utensils. **DO NOT SPRAY DIRECTLY ON HUMANS OR PETS.** NOTE: Kittens and puppies less than 12 weeks old may be sensitive to insecticide. Avoid treating bedding or other key rest areas where they may have prolonged direct contact with product. Keep children and pets out of treated areas until spray has dried.

STATEMENT OF PRACTICAL TREATMENT

If swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching finger to back of throat. Never give anything by mouth to an unconscious person.

If on skin: Remove contaminated clothing and wash skin with soap and water.

If in eyes: Flush eyes with plenty of water. If irritation persists, call physician.

Note to Physician. Chlorpyrifos is a cholinesterase inhibitor, treat symptomatically. Atropine only by injection is an antidote.

ENVIRONMENTAL HAZARDS: This product is toxic to fish, wildlife, and birds. Do not apply directly to water. Do not contaminate lakes or streams by cleaning of equipment or disposal of wastes. Do not contaminate water when disposing of equipment wash waters. Do not use on azaleas, camellias, poinsettias, roses, and variegated ivy because of possible injury to these plants.

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container out of the reach of children. Do not freeze or store above 120° F.

UNUSED PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility

EMPTY CONTAINER DISPOSAL: Do not reuse container. Triple rinse, then wrap original container in several layers of newspaper and discard in trash or dispose of in sanitary landfill.

"Duratrol" is a trademark of 3M
"Sectrol" is a trademark of 3M
"Dursban" is a trademark of DowElanco

Made in U.S.A. by
3M Animal Care Products
3M Health Care
St. Paul, MN 55144-1000

Duratrol™ Yard Spray Concentrate is a concentrate formulation containing microencapsulated Dursban® insecticide for residual control of fleas and ticks in lawn and kennel areas including concrete surfaces. The microcapsules provide a "timed-release" mechanism for up to 4-weeks control of fleas on turf, even when it rains. Also kills many other yard and kennel insects (see Directions for Use). Use a product registered by EPA for use on pets to control the source of your flea infestation. For a total flea control program, ask your veterinarian about Duratrol™ Household Flea Spray and Sectrol™ Pet Spray and Foam. [For a complete flea control program, or for particularly heavy flea infestation, use (product name) in conjunction with other (product names) products (Dog Spray, Fogger, Carpet and Room Spray.)] [For a total flea and tick control program, treat your pet, protect your pet and treat your home with (System) Shampoo, Repellent, Home Spray and Fogger.]

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Outdoor Insects Controlled

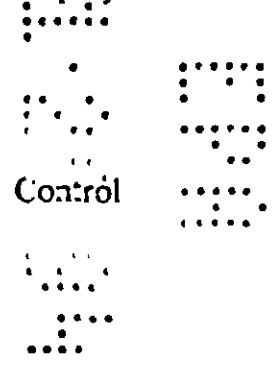
- | | |
|----------------|----------------------------|
| Ants | Flies |
| Bees | Grasshoppers |
| Beetles | Hornets |
| Carpenter ants | Millipedes |
| Chiggers | Scorpions (see How To Use) |
| Clover mites | Silverfish |
| Cockroaches | Sowbugs |
| Crickets | Spiders |
| Cutworms | Ticks |
| Earwigs | Wasps |
| Fleas | Yellowjackets |

How To Spray

Shake bottle before and during spraying to keep contents from settling. Apply the spray directly to the target area such as cracks and crevices, along sidewalks or patios, around windows and door frames, or other areas where pests may be present. Do not spray windows as washing will be required due to water residue.

When To Treat

Use whenever insects are active and a problem, or to prevent house infestations. Control may require one week. Repeat applications every 30 to 90 days.



How To Use

Use as either a perimeter treatment or as a localized spray to control listed insects.

PERIMETER TREATMENTS help prevent infestations of building. When making perimeter treatments, apply this product where pests are active or may find an entrance. For example, treat a band of soil 6 to 10 feet wide around and adjacent to buildings and treat the building foundation to a height of 2 to 3 feet. Thoroughly and uniformly wet the band area, using a smooth back-and-forth motion.

LOCALIZED SPRAYS provide control of insect pests on outside surfaces of buildings and other outdoor areas where pests congregate. Treat by applying the spray directly to the target area such as cracks and crevices, along sidewalks or patios, around (not on) windows and door frames, or other areas where pests may be present.

SCORPIONS: Remove accumulations of lumber, firewood, and other materials which serve as hiding areas. Before stacking firewood or lumber, apply product to surfaces immediately below such materials. Perimeter treatments may also be helpful in reducing pests immigrating from surrounding areas.

IN YARDS:

To control fleas, ticks, and other insects such as ants, chiggers, cockroaches, crickets, cutworms, grasshoppers, mosquitoes, sow bugs, and spiders: Use 2 fl. oz. (4 Tbsp.) of concentrate in 1 gallon of water for every 160 sq. ft. of area to be treated. This bottle (30 fl. oz.), diluted in 15 gals of water, treats up to 2400 sq. ft. Use a garden hose sprayer adjusted to a coarse, low-pressure spray. Apply uniformly, using a smooth back-and-forth motion. Spray directly on insects where possible. Repeat treatment as necessary to maintain effectiveness.

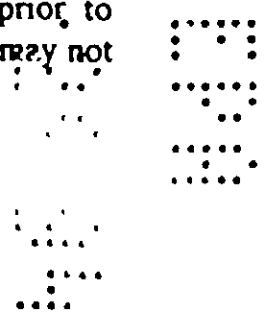
FOR KENNELS AND DOG HOUSES:

Mix 20 fl. oz. of concentrate and water to make 1 gal. of spray. Apply evenly, but not to runoff, to buildings, resting areas, and floors. Replace pet bedding. Do not apply directly to pets or pet bedding.

TO CONTROL FIRE ANTS:

Mix 8 fl. oz. of concentrate and water to make 1 gal. in a sprinkler can. Stir occasionally during use to keep product mixed properly. Thoroughly wet mound and surrounding area to a 4 ft. diameter. Apply during cool weather, 65° - 80° F., or in early morning or late evening. Apply to new mounds as they appear and do not disturb mounds prior to treatment. If possible, treat all mounds in the vicinity and treat all colonies which may not as yet have constructed a mound.

BEST AVAILABLE COPY

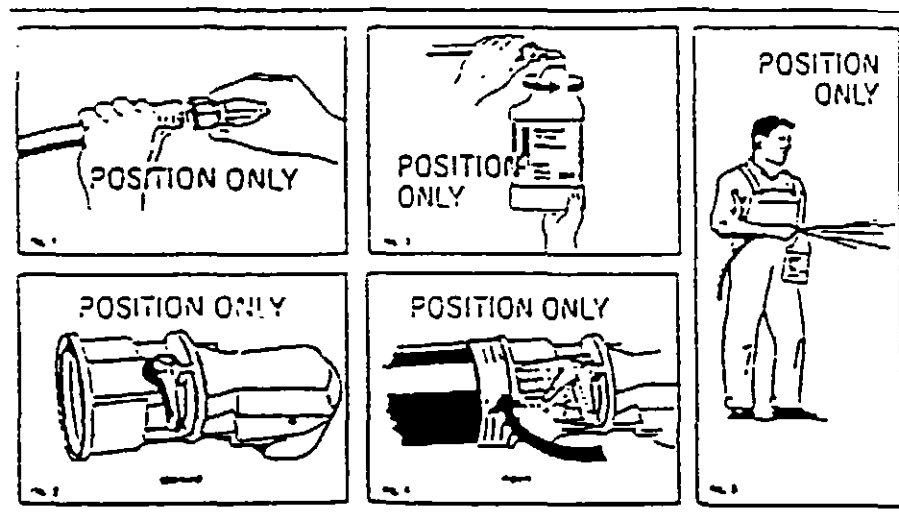


7911

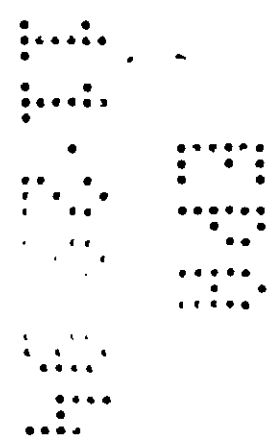
SHAKE WELL BEFORE USE AND FREQUENTLY DURING USE!

How to use the Duratrol hose end sprayer with this product:

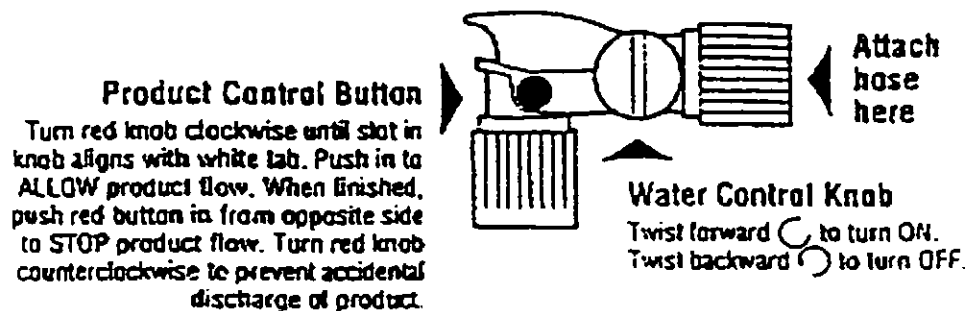
Screw the Hose End Sprayer snugly onto your hose (fig. 1). Make sure the flow switch is in the closed position (fig. 2) Connect the hose to a faucet and turn the water pressure on. Invert the bottle and shake for 20 seconds. Thorough mixing is essential to ensure proper performance. Remove the cap from the bottle. Save the cap. Screw the bottle snugly into the sprayer (fig. 3). Point sprayer away from you. Move the flow switch to the open position to begin spraying (fig. 4). Hold the sprayer at waist level (fig. 5) and slowly sweep the area to be treated. Move at a steady pace. With average water pressure, the bottle should be empty in about 5 minutes. You can stop spraying at any time by returning the flow switch to the closed position. Unscrew the bottle from the sprayer and replace cap on bottle. Unscrew sprayer and rinse before storing. Follow directions on this label for disposal of unused insecticide. **Shake the bottle well before restarting application.** Follow label directions for disposal of empty container. Please note label precautions.



SHAKE WELL BEFORE USING!



[Easy to use:



1. Make sure the ON/OFF Water Control Knob is in the OFF position.
2. Shake well before applying.
3. Connect spray nozzle to hose with convenient swivel end.
4. Turn the red knob on the Product Control Button to align with the white tab, then push the button in all the way. Avoid squeezing bottle after this, as contents may spray through nozzle opening.
- (4. Push the Product Control Button in all the way. Avoid squeezing bottle after this, as contents may spray through nozzle opening.)
5. Turn water on at faucet.
6. When ready to spray, point nozzle toward lawn, then turn Water Control Knob to ON position.
7. When finished, push (red) Product Control Button to OFF position to stop product flow. Turn Water Control Knob to OFF and turn off faucet. Turn Water Control Knob to ON to release water pressure, then turn OFF again.
8. To prevent accidental discharge when not in use, turn red knob so it is not aligned with white tab and cannot be pushed in. Store out of reach of children.
- (8. Store out of reach of children.)]

BEST AVAILABLE COPY

[HOSE END SPRAYER INSTRUCTIONS FOR USE:

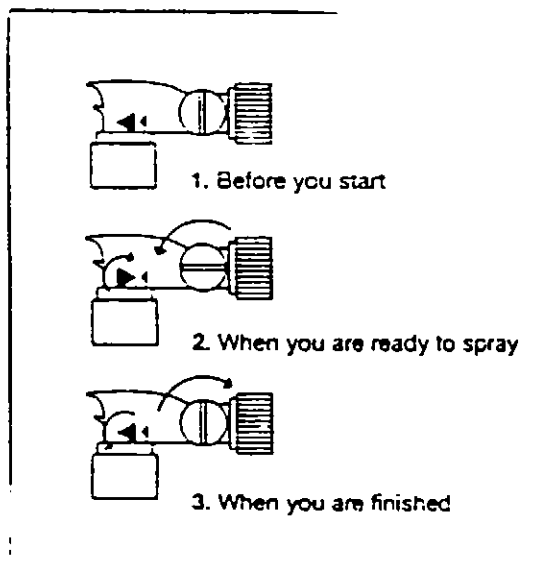
- (1) Before removing cap, invert bottle and shake for 20 seconds. Thorough mixing is essential to ensure proper performance.
- (2) Screw the Hose End Sprayer onto your hose.
- (3) Remove cap from the bottle. Save the cap.
- (4) Screw the bottle snugly into the sprayer.
- (5) Point sprayer away from you. Turn faucet on to begin spraying.
- (6) To start flow of insecticide, place finger over the hole on the right side of the sprayer.
- (7) Hold sprayer at waist level and slowly sweep the area to be treated. Move at a steady pace. With average water pressure, the bottle should be empty in about five (5) minutes.
- (8) To stop flow of insecticide, remove finger from hole to break sprayer action.
- (9) When finished, unscrew the bottle from sprayer and replace cap on bottle.
- (10) Unscrew sprayer from hose and rinse before storing. Shake bottle well before restarting application.]

[HOSE END SPRAYER INSTRUCTIONS FOR USE:

- (1) Invert bottle and shake for 20 seconds. Thorough mixing is essential to ensure proper performance.
- (2) Screw the Hose End Sprayer onto your hose.
- (3) Point sprayer away from you. Turn on faucet to begin spraying.
- (4) To start flow of insecticide, turn Water Control Knob to the ON position.
- (5) Hold sprayer at waist level and slowly sweep the area to be treated. Move at a steady pace. With average water pressure, the bottle should be empty in about five minutes.
- (6) To stop flow of insecticide turn Water Control Knob to WATER position and turn off faucet.
- (7) When finished, turn Water Control Knob to OFF position and unscrew sprayer.

Shake bottle well before restarting application]

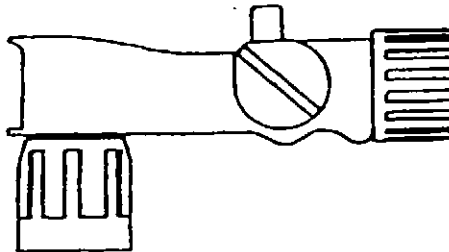
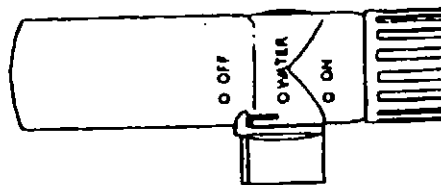
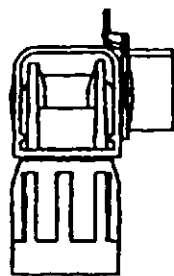
[



HOW TO USE THIS SPRAYER

- 1. Before you start, the blue knob should be pointed away from the triangle on the spray head. If it cannot be turned, push it out from the back. The red knob should be in the OFF position.
- 2. Shake the container well and attach it to your garden hose.
- 3. Turn on the water from the faucet.
- 4. When you are ready to spray, turn the blue knob so that it points at the triangle on the spray head and push it in.
- 5. Turn the red knob one-quarter turn and begin spraying.
- 6. When you are finished spraying or if you have to stop spraying at any time, turn the red knob back to the OFF position.
- 7. Push the blue knob out from the back and turn it. This seals the container.
- 8. Turn off the water from the faucet.
- 9. Turn the red knob ON then OFF, to drain the water from the hose
- 10. Unhook the container from the hose and store it carefully or throw it away.]

10 9 11



1. Make sure water control knob on hose sprayer is in the OFF position.
2. Hold by handle and shake vigorously, turning bottle as you shake.
3. Attach hose to spray nozzle.
4. Bend safety tab down and turn control to "water".
5. Slowly turn on water supply to a moderate rate of flow.
6. Point nozzle toward lawn, turn water control knob to "ON". Product will automatically mix with the water. Slowly sweep the area to be treated. Hold bottle level and move at a steady pace. With average water pressure, the bottle will empty in about five (5) minutes. Treats up to 2,400 square feet.

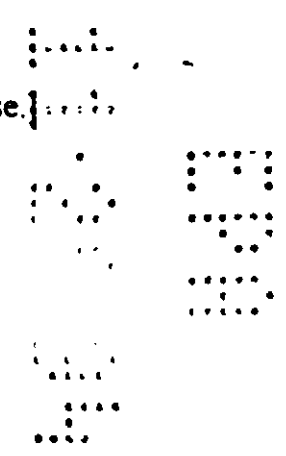
Important Information:

The ABC's of Flea & Tick Control

- A. Treat Your Pet with (System) Flea & Tick Conditioning Shampoo for Dogs to kill fleas and ticks while conditioning your dog's coat.
- B. Protect Your Pet with (System) Flea & Tick Repellent to keep fleas and ticks from re-infesting your pet. For continuous protection, use the (Product name) Collar.
- C. Treat Your Home with (System) Home Flea & Tick Killer or Home Fogger containing (Product name) an Insect Growth Regulator (IGR). Both are guaranteed to kill fleas and ticks plus protect your home from re-infestation of hatching eggs for 210 days. Treat the yard around your home with (System) Yard & Kennel Spray to kill fleas and ticks outside for up to 4 full weeks.

Be sure to read full directions and precautions on the label of each product you use.

BEST AVAILABLE COPY



11 3 11

NOTICE - LIMITED WARRANTY:

3M guarantees only that the product, if used as directed, will perform as described on this label. 3M makes no other guarantees, warranties or promises, express or implied, for the product. The purchaser's sole and exclusive remedy shall be limited to product replacement or refund for the returned product at 3M's option. 3M will replace any product found by 3M to be defective.

The foregoing warranty is in lieu of all other warranties, expressed or implied, including the warranty of merchantability or fitness for a particular purpose. 3M shall not be liable for any damages, including indirect, special, incidental and/or consequential damages, regardless of the legal theory asserted, including negligence and/or strict liability arising out of the use of, or the inability to use, or the performance of the product.

Some states do not allow the exclusion or the limitation of incidental or consequential damages, so the above limitation or exclusion may not apply to you.

This warranty gives you specific legal rights, and you may also have other rights which vary from state to state.

For any warranty questions, contact Animal Care Products /3M.

