JAN 27 1994

Ms. Christina M. Lawe...
Manager, Federal Registrations
Roussel Uclaf Corporation
95 Chestnut Ridge Road
P.O. Box 30
Montvale, NJ 07645

SUBJECT: APPLICATION FOR LABEL AMENDMENT

FORD'S COMMERCIAL SPRAY EPA Reg. No.: 10370-25

Submission: December 20, 1993

Dear Ms. Lawes:

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

- o Submit a revised Confidential Statement of Formula (CSF) to reflect the changes made to the ingredients statement on your label. It is understood that the revised CSF, when accepted, will supersede previously accepted ones.
 - a. Revise your Confidential Statement of Formula and/or label to correspond to the nominal concentration of the product in accordance with 40 CFR 156.10(g)(5), 40 CFR 158.175, and PR Notice 91-2. The certified limits are intended to encompass the active ingredient percentage declarations on the label.
 - b. Each of the formulation components including the inert ingredients, must be listed in column 10, and the associated information provided in columns 11, 12, 13a, 13b, 14a, 14b, and 15 for each component.
 - c. Give the name and address of the suppliers of active and inert ingredients.

CONCURRENCES		
SYMBOL Rodaine		
SURNAME 7505C		***************************************
DATE \$ 1/2-7/94		
EPA Form 1320-1A (1/90)	Printed on Recycled Paper	OFFICIAL FILE COPY

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- d. Supply the CAS numbers for the intentionally added inerts in the product formulation.
- e. Verify that the Flash Point/Flame Extension for your product is 150°F.
- O Change "Hazards To Humans" statement to read "Hazards To Humans And Domestic Animals."
- o Center the signal word "Caution" under the revised "Hazards To..." statement.

A stamped copy of the draft label is enclosed for your records.

Sincerely,

Robert S. Brennis

Acting Product Manager 10

Insecticide & Rodenticide Branch

Registration Division (7505C)

Enclosure

Ford's

COMMERCIAL SPRAY

- CONTAINS 0.2 POUNDS OF SBP-1382 PER GALLON
- FOR INDOOR USE IN ULV, MECHANICAL MISTING SPRAYERS, OR THERMAL POGGERS
- * FOR HOMES, STORES, INSTITUTIONS, RESTAURANTS, FOOD PROCESSING PLANTS, WAREHOUSES, INDUSTRIAL INSTAL-LATIONS, AND HORSE STABLES

ACTIVE INGREDIENTS:

+ † Resmethrin [5-phenylmethyl)-3-furanyll methyl 2,2-dimethyl-3-(2-methyl-1-propernyl)

NERT INGREDIENTS:***

Contains aromatic petroleum hydrocartiers and petroley m distillates
petroley m distillates
Cis/trans isomers ratio: max. 30% (+/-) cis and min. (+/-) trans

† U.S. Patent No.'s 3,465,007 and 3,542,928

◆Roussel Uclaf Corporation's SBP-13€2® brand of resmethrin insecticide. ◆Registered Trademark of Roussal Uclaf Corporation.

EPA REG. NO. 10370-25

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting because of aspiration hazard. Call a physician.

IF IN EYES: Flush with plenty of water for at least 15 minutes. Get medical attention if irritation persists.

IF ON SKIN: Wash off with soap and water.

See Side Panel For Additional **Precautionary Statements**

ACCEPTED with COMMENTS in EPA Letter Dated

JAN 2 / 1994

Under the Federal Inscetteide. Fungicide, and Resenticide Act as amended, for the pesticide registered under EPA Reg. No. 103/0-25



Roussel Uclaf Corporation 95 Chestnut Ridge Road Montvale, New Jersey 07645 25s 110090 k

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS Hazards To Humans

CAUTION

Harmful if swallowed. Avoid breathing vapor. Avoid contact with skin, eyes, or clothing. Wear protective clothing. Wash exposed skin with soap and water after handling and before eating. Wash all contaminated clothing with soap and water, separately from other clothing, before re-use.

Physical Or Chemical Hazards

Extinguish open flame before space spraying. This formulation is combustible. DO NOT USE, POUR, SPILL OR STORE NEAR HEAT OR OPEN FLAME.

Add Attachment 1

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food or feed by methods of storage or disposal. Open burning open dumping, including burial, are prohibited.

Pesticide Disposal: Pesticide spray mixture, or rinsate that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticides, or butied in a safe place away from water supplies.

Container Disposal: Properly identify all used containers. Triple rinse (or equivalent) and offer for recycling, reconditioning or disposal in approved landfill, or bury in a safe place. A container size of 30 gals, or more may be resealed and offered for reconditioning.

General: Consult Federal, State or Local disposal authorities for approved alternate procedures.

This concentrate is designed for use undiluted in ULV sprayers such as the Leco Mini ULV or Micro-Gen, which give particles of aerosol size. It can also be diluted with oils which meet food additive regulation 172-884 for use in mechanical fogging equipment such as the Microsol or Challenger machines which give larger particles. It can also be diluted with it as specified and applied as a contact spray.

In food handling areas, food should be removed or covered previous to treatment. All food processing surfaces should be covered or thoroughly cleaned before using. Apply of hear facility is not in operation.

Before application, remove plants and animals from area to be treated. Remove horses before spraying stables. Use of this product in horse stables is restricted to stables housing horses that will not be used for food.

For ULV use in mechanical aerosol generators such as the LECO Mini ULV or Micro-Gen. Apply undilunded the rate of Q.S.fl. oz. of concentrate per 1000 cubic feet of space. Direct output from aerosol generator upwards toward upper corners of room and ceiling. This undiluted spray may be applied in facilities. operating under USDA poultry, meat, rabbit and egg products inspection program.

Extinguish all flames in the area to be treated. Shut off all air conditioning or ventilating equipment

Vacate room before application. Leave closed for one hour after spraying. Ventilate room thoroughly before reentry.

SPACE SPRAY - To kill Adult And Accessible Stages Of Insect Pests Of Stored Foods: Grain Weevils, Flour Beetles, Sawtootbed Grain Beetles, Angoumois Grain Moths, Mediterranean Flour Moths, Indian Meal Moths, Grain Mites, Carpet Beetles And Spider Beetles. Direct output into corners, under pallets, hitting as many of the insects as possible and then treat as a space spray upward toward upper corners of room and ceiling.

TO KILL Housefiles, Mosquitoes and Gnats, treat as a space upray directing output toward upper comers of room and ceiling.

CONTACT SPRAY - Use undiluted to kill Roaches, Silverfish, Earwigs, Ants, Spiders, Crickets, Centipedes, Sowbugs, Millipedes, Carpet Beetles: Apply the spray as a coarse wet spray into all cracks and crevices in woodwork, walls, floors, beneath sinks and other insect harborages contacting as many insects as possible.

TO KILL Wasps and Hornets, contact application should be made in late evening when insects are at rest. Spray liberally into hiding and nesting places, contacting as many insects as possible. Repeat as necessary.

FOR MECHANICAL MISTING EQUIPMENT such as the Microsol or Challenger Machine:

Diluting Instructions - Dilute to 0.5% SBP-1382 by adding 1 fl. oz. of the 3.0% concentrate to 5 fl. oz. of petroleum distillate.

Dilute to 0.25% SBP-1382 by adding 1 fl. oz. of the 3.0% concentrate to 11 fl. oz. of petroleum distillate.

Dilute to 0.20% SBP-1382 by adding 1 fl. oz. of the 3 0% concentrate to 14 fl. oz. of petroleum distillate.

Dilute to 0.10% SBP-1382 (which would be used for flying insects only) by adding 1 fl. oz. of the 3.0% concentrate to 29 fl. oz. of petroleum distillate.

For most effective results against flying insects, operate spraying dispenser adjusted to deliver a fine mist. For flying insects, use either 0.10% or 0.25% SBP-1382.

TO KILL HOUSEFLIES, MOSQUITOES, GNATS, WASPS, HORNETS AND SMALL FLYING MOTHS: Close all doors and windows. Point nozzle upward, direct the spray mist to all parts of the room, especially windows and other light sources which attract these insects. Fill the room with mist, then leave the treated area. Keep the room closed for at least 15 minutes. Ventilate the room before reentry. Repeat as necessary.

To kill crawling insects, adjust spray to produce large wetting type spray particles and use either 0.25% or 0.50% SBP-1382.

TO KILL ROACHES, EARWIGS, GRAIN MITES, SOWBUGS. SPIDERS, SILVERFISH, CRICKETS, CENTIPEDES AND GRAIN INSECTS (ADULT AND ACCESSIBLE STAGES OF CONFUSED FLOUR BEETLES, RED FLOUR BEETLES, SAW-TOOTHED GRAIN BEETLES. SHINY SPIDER BEETLES, CARPET BEETLES. GRAIN WEEVILS, ANGOUMOIS GRAIN MOTHS, INDIAN MEAL MOTHS): Spray thoroughly into hiding places such as cracks, crevices, moist areas openings around dides and sinks, under

refrigerators, baseboards, storage areas and other insect harborage areas. Spray directly on insects where possible. Repeat as necessary.

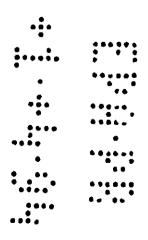
TO KILL WASPS AND HORNETS - Contact application should be made in late evening when the insects are at rest. Spray liberally into hiding and nesting places, contacting as many insects as possible. Repeat as necessary.

TO KILL ANTS - Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary.

THERMAL APPLICATIONS, INDOORS - Use 0.2% SBP-1382 for the control of houseflies, mosquitoes and gnats in warehouses, restaurants and industrial institutions. Shut off ventilating systems, air ducts, air conditioning equipment and close off room or area to be treated.

Extinguish all flames and pilot lights. Apply as a drying fog at the rate of 1-1/3 fluid ounces per 1000 cubic feet of space. Direct nozzle of thermal applicator toward the upper corners of the room and along the ceiling. Close off room for at least one-half hour. Do not remain in treated areas. Ventilate the area before reentry.

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



Attachment 1

Environmental Hazards

This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of equipment wash waters.

