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DEC 07 1990

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Mr. Douglas Raymond
Regulatory Affairs
Sprayon Products
Division of Sherwin-Williams Company
26300 Fargo Avenue
Bedford Heights, OH 44146

Dear Mr. Raymond:

Subject: Active to Inert Ingredient Substitution
Your Label and Your Confidential Statement of
Formula Dated March 30, 1990
EPA Registration No. 10900-53

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the following comments:

1. Submit a revised Confidential Statement of Formula. Please provide the density of the product, the flashpoint of the product with the propellant, and the pH of the product.
2. Change the Physical or Chemical Hazards statement to read:

~~Keep away from flames, heat, and electrical~~
Extremely flammable. Contents under pressure.
surfaces. Do not puncture or incinerate
container. Exposure to temperatures above
130 °F may cause bursting

3. Your labeling makes reference to areas that may be designated as U.S. Department of Agriculture (USDA) meat and poultry processing plants. You must qualify your site designation to exclude USDA meat and poultry processing plants.

If you wish not to include the qualification, submit a separate application with USDA to obtain approval in such processing plants. After USDA approval, submit a revised label with wording changed to reflect USDA acceptance for EPA approval.

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CONCURRENCES

SYMBOL	SURNAME	DATE						

You may submit your USDA application to:

Mr. Charles Edwards
Compound Evaluation Laboratory
Scientific Services, FSQS
Food Ingredient Assessment Division
U.S. Department of Agriculture
Building 306, BARC - East
Beltsville, MD 20705
(301) 344-2566

4. Replace:

Cover exposed food.

with:

Cover carefully or remove exposed food. Food contact surfaces and equipment must be washed with an effective cleaning compound followed by a potable water rinse after treatment.

5. Replace "See a physician" after the "If In Eyes" section with "Get medical attention if irritation persists."

6. Add "Get medical attention if irritation persists" after the "If On Skin" section.

A stamped copy of the label is enclosed for your records. Submit five (5) final printed labels.

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure