9 DEC 1994

Ms. Lisa R. McClellan Specialty Division Division of the Sherwin-Williams Company 31500 Solon Road Solon, Ohio 44139

Dear Ms. McClellan,

Subject:

Label Revision

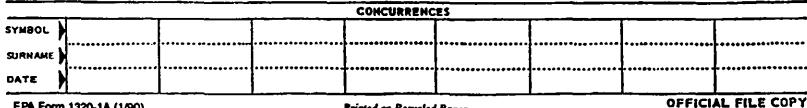
876 Institutional Insecticide

EPA Registration Number 10900-63

Submissions Dated August 11, 1994 and August 29, 1994

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. Three (3) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the product label is enclosed for your records.

- 1. In the section titled Food Areas, revise the statement "All food processing surfaces..." to read as follows: All food processing surfaces, shelving, utensils, etc. should be covered or removed prior to treatment, or thoroughly washed with an effective cleaning compound followed by a potable water rinse prior to use.
- 2. Revise the precaution Hazards to Human and Domestic Animals to read as follows: Hazards to **Humans and Domestic Animals.**
- 3. The precautionary paragraph which appears on the label accepted 15 April 1993 must be reinstated. It is not appropriate to revise this statement to "reflect the true toxicology data on file with the EPA", as put forth in your letter dated 11 August 1994. If you wish to revise this statement, you must provide the specific MRID Numbers of the studies which you are citing to support the label revision. This precautionary paragraph may not be revised until the appropriate information is received, reviewed, and found acceptable by the Agency.
- 4. The company name and address must appear on the product label.
- 5. The heading STATEMENT OF PRACTICAL TREATMENT must be reinstated on the product label, and the heading FIRST AID must be deleted.
- 6. Include the following statement as the first sentence in the STORAGE AND DISPOSAL section: Do not contaminate water, food, or feed by storage or disposal.



EPA Form 1320-1A (1/90)

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7. Expand the Storage section of the STORAGE AND DISPOSAL statement as follows:

Storage: Store in a cool, dry area inaccessible to children and pets. Keep container closed.

- 8. Each of the separate sections of the product label (such as TO KILL FLYING INSECTS, TO KILL WASPS AND HORNETS, and TO KILL GRAIN INSECTS are some examples) which put forth directions for use of this product should also contain a rate of product application. The section titled TO KILL FLEAS & TICKS ON DOGS, CATS & PREMISES contains the rate phrase "...at the rate of two seconds per linear foot...". Ensure that an application rate as well as a reapplication interval (i.e. repeat as necessary) are included in each separate section of the DIRECTIONS FOR USE.
- 9. Include the following statement on the product label in the section titled TO PROTECT ORNAMENTAL PLANTS: Do not use treated plants for food or feed purposes.

Sincerely,

Mr. Harvey Warnick

Acting Product Manager 10
Insecticide-Rodenticide Branch

Registration Division

CONCURRENCES							
SYMBOL			_		•••••		
SURNAME							
DATE							

ACCEPTED with COMMENTS In FPA Letter Dated 9 DEC 1994

876 Institutional Insecticide

Under the Federal Insections, Fungroide, and Place 19 as amended, for the coregistered under E. 10400-63

ACTIVE INGREDIENTS:

*•+Resmethrin ([5-(phenylmethyl)-3-furanyl] methyl 2,2-dimethyl-

3-(2-methyl-1-propenyl)

cyclopropanecarboxylate..... 0.2%w/w

INERT INGREDIENTS: 99.4% 100.0%w/w

* Cis/trans isomers ratio:

max. 30%(+-) cis and min. 70%(+-) trans

• U.S. Patent Nos. 3,465,007 and 3,542,928.

**Bioallethrin

10900-CA-1

EPA Reg. No. 10900-63 EPA Est. No. 10900-OH-1 33915-MI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautionary statements.

20 oz. (1 lb. 4 oz.) * 566 g net wt.

876 Institutional Insecticide

A Synthetic pyrethroid for controlling the following flying & crawling insects in and around households, greenhouses, buildings, vehicles, boats, kennels & stables:

Flying Insects

hcuseflies mosquitoes gnats (midges) deer flies stable flies flying moths (millers) fruit flies wasps hornets yellow jackets bees

Crawling Insects

cockroaches waterbugs bedbugs fleas ticks ants crickets silverfish earwigs spiders sowbugs centipedes millipedes grain mites grain insects Plant Pests

aphids
thrips
whiteflies
leafhoppers
two-spotted mites
plant bugs
army worms
cutworms

leaf beetles
gypsy moths
lussock moths
oakworms
sawflies
tent caterpillars
red spider mites

spittle bugs
weevils
Japanese beetles
slugs
mimosa webworm
spider mites
budworms

876 Institutional Insecticide

Directions For Use

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes or ornamnetal gardens.

For use indoors and outside premises of hotels, motels, homes, preschools, children's nurseries, day camps, noncommercial greenhouses, lathouses, and seed houses, commercial, industrial, office, institutional and storage buildings, milk handling areas of milk plants, milk storage rooms, egg processing plants, supermarkets, restaurants, bottling plants, canneries, flour and leed mills, bakeries, boats, ship cabins and hospitals. In hospitals, remove patients prior to treatment. Ventilate rooms for two hours before returning patients. Also for use in campers, mobile homes, buses, automobile, trucks, boxcars and ship cargo holds. Also for use in dog kennels and horse stables. In horse stables, not for application if horses will be used for food.

Food Areas: Food 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 the facility is not in operation.

Precautionary Statements Hazards to Human and Domestic Animals

CAUTION

Cover and remove exposed foods. Avoid contamination of cooking utensils and food preparation surfaces. Remove pets and cover fish aquariums before spraying.

FIRST AID: If in Eyes: Wash with plenty of water. Get medical attention if irritation persists. If on Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

PHYSICAL OR CHEMICAL HAZARDS

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Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish. For terrestrial uses, do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark.

STORAGE AND DISPOSAL

Disposal: This container may be recycled in the few but growing number of communities where (steel) aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. (Do not Puncture!) If recycling is not available, wrap the container and discard in the trash.

Storage: Store in a Cool Dry Place. Keep Container Closed.

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Important Note: Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

DIRECTIONS FOR USE (CONTINUED)

Shake well before use. Remove protective cap. Aim spray opening away from person. Push button to spray.

Indoors: For us in household, commercial and institutional building, hospitals, noncommercial greenhouses and lathouses, campers, mobile home, vehicles and boats, as listed above.

TO KILL FLYING INSECTS: houseflies, mosquitoes, gnats (midges), deer flies, flying moths (millers), fruit flies. Close all doors and windows. Point nozzle upward. Direct spray mist to all parts of the room, especially window 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 when treatment is completed.

TO KILL WASPS, HORNETS, YELLOW JACKETS, BEES: Application should be made in late evening when insects are at rest. Spray liberally into hiding and breeding places, especially under attic rafters, contacting as many insects as possible. Repeat as necessary.

TO KILL CRAWLING INSECTS: Fleas, cockroaches, waterbugs, crickets, silverfish, earwigs, spiders, sowbugs, centipedes, millipedes, grain mites and grain insects (adult and accessible stages of confused flour beetles, red flour beetle, sawtoothed grain beetles, shiny spider beetles, carpet beetle, grain weevils, Angoumois grain moths, Indian meal moths). Spray thoroughly into hiding places such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards, storage areas and other insect harborage areas. Spray directly on insects where possible. Repeat as necessary.

TO KILL GRAIN INSECTS: For control of the insect pests listed above, remove infested grain, cereal or flour and destroy. Avoid contamination of other food and foodstuffs in the area by removing before spraying: Spray directly on exposed stages and into cracks and crevices where grain insects may be hiding. In homes, dispose of all infected products, The shelves and drawers should be cleaned and thoroughly sprayed so as to contact all pests, and covered with shelf paper after allowing shelves to dry. Any utensils that are contacted with spray should be washed before using. Repeat as necessary.

TO KILL SPIDERS: Spray directly on these pests and use repeated applications to the webbing and all cracks and crevices which harbor spiders.

TO KILL ANTS: Spray doors, around window frames, and trails and hills.

TO KILL BEDBUGS: Apply as a spot treatment to cracks and crevices around baseboards, floorboards, bedboards and walls. First, thoroughly clean and air mattresses and springs. Then spot treat only areas that may harbor bedbugs, concentrating on tufts, folds and seams. Repeat as necessary. For persistent infestations, consult professional applicator.

TO KILL FLEAS & TICKS ON DOGS, CATS & PREMISES: Apply directly to animals along back, under forelegs, and other areas except scrotum and anus. Part hair to contact skin and insure good coverage. Hold nozzle about one foot away while spraying. Apply until hair is thoroughly moist. Do not spray directly in eves or mouth of animal. Repeat within 24 hours of first treatment, if necessary. To reduce reinfestation, thoroughly spray the animal's bedding and other resting areas until the surface is slightly moist. Treat these areas at the rate of two seconds per linear foot at a distance of 12 to 18 inches. Also spray the entire inside surface of dog houses. Repeat as necessary, thoroughly spraying finors, crack, crevices, and bedding. Hit as many insects directly as possible.

TO PROTECT ORNAMENTAL PLANTS in noncommercial greenhouses and lathouses, homes, commercial and institutional buildings, and for indoor landscaping: 3pray directly on insects as directed below to kill aphids, exposed thrips, whiteflies,

leafhoppers, plant bugs, spittlebugs, two-spotted mites, red spider mites, spider mites, cutworms and slugs on the following plants.

African violet coleus asparagus fern Jacob's ladder pothos ageratum gold-dust croton fuchsia lilac cup flower lobellia amwranth geranium snapdragon daisy heliotrope false aralea marigold silver vase hibiscus begonia daphne mayten tree toyon Christmas cactus dracaena impatiens nasturtium verbena chrysanthemum dumbcane ivy petunia umbrella tree cockscomb fatshedera iade philodendron wax plant zinnia

Contact Spray for pests listed above: Hold container 18 inches from the infested plants. Spray in short bursts from one to three seconds or spray at the rate of one linear foot of growth per second. Direct spray to all sides covering foliage until slightly moist. Avoid heavy wetting. Repeat as necessary to obtain control. If application is made indoors, remove infested plants from living and eating areas prior to spray application. Spray several plants at once and in an area not likely to come in contact with pets, children or food. When leaves dry,, plants can be returned to original position. If plant removal is not possible, remove or cover exposed food and food handling surfaces, including utensils. Shut off ventilating systems, air ducts and air conditioning equipment. Avoid spray contact with surrounding surfaces in area. Leave the sprayed area after treatment and ventilate.

Use with caution-on African violet, ash, azalea, Reiger begonia, browallia, caenothus, camellia, columnea, cotoneaster, cyclamen, cypress, plumosa fern, gloxinia, impatiens, juniper, non-bearing mulberry and quince, oxalis, jade and primrose. As with all plants listed above, especially carnations, chrysanthemums and roses, there exists a wide variety of species and cultivars and, therefore, a wide variety of susceptibility to injury. To ascertain possible phytotoxicity, spray a few plants as described above, wait 24 hours and check for possible injury.

Outdoors: For use around residential, commercial and institutional buildings, hospitals, gardens, noncommercial greenhouses, yards, patios, mobile homes, campers, boats, and swimming pools for controlling household and plant pests listed below:

To kill: houseflies, mosquitoes, gnats (midges), deer flies, stable flies, flying moths (millers), fruit flies - Spray resting areas to reduce annoyance from these pests. Follow precautions listed above for ornamental plants. Hold container 18 to 24 inches from shrubs, bushes, and grassy areas. Spray these areas with a slow sweeping motion at the rate of from 1 to 3 per cubic yard of space, while moving away from the treated areas. Treat open porches and patios in a similar manner. Spray only when the air is still. Allow spray to dissipate before occupying the treated area. Repeat as necessary.

Wasps, hornets, yellow jackets, bees - Same is directed above for indoor use. APPLICATION SHOULD BE MADE LATE IN THE EVENING WHEN INSECTS ARE AT REST. Aim spray at nest openings in ground, bushes, and in cracks and crevice; which may harbor nests, saturating nest openings and contacting as many insects as possible. Repeat as necessary.

Ants and fleas - same as directed for indoor use.

Crickets, silverfish, earwigs, spiders, sowbugs, centipedes and millipedes - name as directed above for indoor use. TO PROTECT ORNAMENTAL PLANTS - Spray directly on insects as directed below to kill: aphids, exposed thrips, whitefiles, leafhoppers, Japanese beetles, plant bugs, spittlebugs, two-spotted mites, red

spider mites on:

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althea	forsythia	mimosa	pine	also:
white birch	hemlock	non-bearing citrus	pyracantha	mimosa webworm
cypress	holly	and cranberry	rhododendron	on
dogwood	locust	oak	spi rea	mimosa
euonymous	maple	palm	spruce	

viburnum toyon

To kill army worms, budworms, leaf beetles, gypsy moths, tussock moths, oakworms, sawflies, tent caterpillars, and weevils on the above plants; also slugs on roses; spider mites on chrysanthemums; cutworms on gladiolus and petunia. To kill aphids, exposed thrips, adult whiteflies, leafhoppers, plant bugs and Japanese beetles on:

African violets	chrysanthemum	fatshedera	ivy	philodendron
ageratum	coleus	geranium	marigold	queen sago
begonia	daisy	honeysuckle	nasturtium	roses
broadleaf acacia	daphne	iris	peony	snapdragon
	-		- •	tobira
				zinnia

Contact spray direction for above pests: Hold container 18 inches from the infested plants. Spray in short bursts from one to three seconds or spray at the rate of one linear foot of growth per second. Direct spray to all sides covering foliage until slightly moist. Avoid heavy wetting. Repeat as necessary to obtain control. For adult whiteflies and two spotted mites be sure to direct spray to contact these pests. Thoroughly cover the infested area. Use several repeat applications at two-day intervals if necessary.

Use with caution on African violet, ash azalea, Reiger begonia, browallia, caenothus, camellia, columnea, cotoneaster, cyclamen, cypress, plumosa fern, gloxinia, impatiens, juniper, non-bearing mulberry, flowering quince, oxalis, jade, primrose, and rose, including hybrid tea rose, there exists a wide variety of species and cultivars and, therefore, a wide range of susceptibility to injury. To ascertain possible phytotoxicity, spray a few plants as described above, wait 24 hours and check for possible injury.