

DEC 07 1990

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. 10900-66

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. Revise the ingredients statement to read as follows:

Active Ingredients:

Resmethrin	0.568%
Inert Ingredients:	99.432%
	<u>100.000% w/w</u>

3. Add the following Environmental Hazards block:

Environmental Hazards

This pesticide is highly toxic to fish. Do
not apply directly to water or wetlands
(swamps, bogs, marshes, and potholes). Drift

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and runoff from treated sites may be hazardous to fish in adjacent waters. Do not contaminate water when disposing of equipment washwaters.

4. After the statement ". . . and food preparation surfaces," add:

Food contact surfaces and equipment must be washed with an effective cleaning compound followed by a potable water rinse after treatment.

Replace "All food processing surfaces should be covered before treatment or thoroughly cleaned before using" with the above statement.

5. 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, a separate application must be submitted to 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.

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) 344-2500

6. Change the Physical or Chemical Hazards statement to read:

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

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