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28293-121

9/23/98

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Barry Santerre
Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, FL 34762

SEP 23 1998

Subject: Homeowner Exposure Reduction, Label Amendment
EPA Reg No.: 28293-121
Submission Dated Jan 15, 1998

Dear Mr. Santerre:

The revised labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you incorporate the Agency's condition as enumerated in this letter below and submit three copies of your final, printed labeling prior to releasing the product for shipment. A stamped copy of the current label is enclosed.

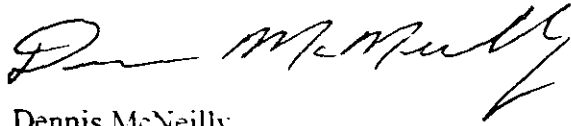
1. The statement on page 3 of the label: "Limit individual spot treatments to an area no larger than 20% of the floor surface." must be deleted. A major objective of the Agency is to limit indoor chlorpyrifos exposure to crack and crevice and spot treatment only. The statement that individual spot treatment are considered to be areas no larger than 2 sq. ft. is correct. The Agency's position, and that of the technical grade chlorpyrifos registrants, is that if an area approaching 20% or more of a floor needs to be treated than other more appropriate products should be used. The Agency believes that mentioning specific treatment sites such as those mentioned in the second paragraph under "Locations Other Than Commercial Food Establishments" is adequate labeling.

2. Please correct the spelling of Clearwater on page 1.

Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions. If these conditions are not complied with, your registration will be subject to cancellation in accordance with FIFRA Section 6(e).

If you have questions, please contact me at (703) 305-5404 or electronically at
McNeilly.Dennis@EPA@mail.EPA.gov.

Sincerely,



Dennis McNeilly
Chemist
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure: Stamped label

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UNICORN DURSBAN-RESMETHRIN SPRAY

Residual Type Insecticide - Remains Effective 4 weeks

Kills Flea Larvae for 6 Weeks

A Quick Acting Surface Spray for Indoor and Outdoor Use
in Homes, Institutions, Restaurants, Food Processing Plants
and other Commercial Facilities and
Recreational Areas.

Kills cockroaches, ants, house flies, mosquitoes, fleas,
waterbugs, palmetto bugs, wasps, hornets, Brown Dog and Lone Star ticks,
silverfish, spiders, crickets, chiggers, small flying moths,
carpet beetles, centipedes, millipedes, earwigs, sowbugs, pillbugs and clover mites.

ACTIVE INGREDIENTS:

*Resmethrin [5-(phenylmethyl)-3-furanyl] methyl 2,2-dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylate	0.10%
Chlorpyrifos [O,O-diethyl O-(3,5,6-trichloro-2-pyridyl) Phosphorothioate]	0.50%

INERT INGREDIENTS:	99.40%
Total:	100.00%

* Cis/trans isomers ratio: Max. 30% (±) cis and
Min. 70% (±) trans

Dursban^(R) is a Registered Trademark of DowElanco

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

SEP 23 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

78293-121

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Rear Panel for Additional Precautions

NET CONTENTS: 1 QUART (32 OUNCES)

MANUFACTURED BY:

Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, Florida 33762

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Keep out of reach of children. Avoid breathing spray mist. Avoid skin and eye contact. Wash thoroughly after handling and before eating and smoking. Do not allow children or pets to contact treated surfaces until spray has dried. Do not spray air in rooms or use on plants. Apply as a surface spray only. Do not allow spray to contact food, feedstuffs, or water supplies. Thoroughly wash and rinse with potable water, dishes and food handling utensils contaminated with this product. In commercial food handling facilities, cover or remove any food or food processing equipment during application. Do not apply while food processing is underway. Remove pets, birds and cover fish aquariums before spraying.

Statement of Practical Treatment

IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water. Wash clothes before reuse.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

NOTE TO PHYSICIAN: Chlorpyrifos is a cholinesterase inhibitor. If symptoms of cholinesterase inhibition appear, atropine only by injection is an antidote.

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

Physical or Chemical Hazards

Do not apply this water-based product in conduits, motor housings, junction and switch boxes or other electrical equipment because of possible shock hazard. If there is need to treat such areas use only oil-base sprays.

DIRECTIONS FOR USE

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

IN FOOD HANDLING ESTABLISHMENTS:

APPLICATION OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS OTHER THAN AS A SPOT AND/OR CRACK AND CREVICE TREATMENT IS NOT PERMITTED.

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Application Within Food Handling Establishments: (places other than private residences where exposed food is held, processed, prepared or served) including, but not limited to, areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing foods, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) and serving areas (when food is exposed and facility is in operation): Use as a crack and crevice treatment in and around both food and non-food areas to control ants, cockroaches, crickets, centipedes, millipedes, earwigs, firebrats, pillbugs, silverfish, spiders, waterbugs and palmetto bugs. Apply in small amounts directly in cracks and crevices, using equipment capable of delivering a pin stream of insecticide, in points between different elements of construction, between equipment and floor, openings leading to voids and hollow spaces in walls, equipment legs and bases.

Do not use this product in conduits, motor housings and junction or switch boxes. Limit spot treatments to floor surfaces where pests have been seen or where they are suspected of hiding. Limit individual spot treatments to an area no larger than 20% of the floor surface. Individual spot treatments should not exceed two square feet. Take extreme care that the product is not introduced into the air. Avoid contamination of food and food processing surfaces.

Application Within Food Serving Areas (facilities where foods are served, such as dining rooms, but excluding areas where food may be prepared or held): Apply as a spot treatment to selective surfaces, such as baseboards, under elements of construction and into cracks and crevices. Avoid treating surfaces likely to be contacted by food. (Do not apply when facility is in operation or foods are exposed.)

LOCATIONS OTHER THAN COMMERCIAL FOOD ESTABLISHMENTS

PESTS INDOORS: Use this product as a spot treatment to control cockroaches, waterbugs, palmetto bugs, ants, crickets, firebrats, silverfish, clover mites, centipedes, millipedes, earwigs, sowbugs and spiders in and around residential, industrial, offices, storage, institutional and commercial buildings, including homes, apartment buildings, hospitals, stores, manufacturing plants, warehouses, kennels, horse stables, hotels, motels, preschools, recreational buildings, campers, mobile homes, buses, automobiles, boats, ship cabins, cargo planes, trucks, boxcars and ship cargo holds. Treat only non-food areas of ships, trucks and boxcars.

Apply as a spot or crack and crevice treatment to areas where these pests are found or may hide, including dark corners of rooms and closets, cracks, crevices, along baseboards, and door sills and frames, behind and beneath sinks, stoves, refrigerators, cabinets and around garbage cans, plumbing and other utility installations. Pests flushed out of hiding should be sprayed directly. Treat ant trails, nests and points of entry. Repeat treatment as necessary. Do not use as a space spray. Remove pets and cover or remove fish bowls before spraying. Do not allow children to contact treated surfaces until surfaces are completely dry.

IN HOSPITALS, remove patients prior to treatment. Ventilate rooms for two hours before allowing patients to return.

Do not treat pets or horses with this product. Do not spray on pet or horse food or feed items.

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To Kill Carpet Beetles. Spray edges of carpeting and under carpeting and rugs. Make localized application to the floor and baseboards. Spray directly into cracks, crevices, closets and infested areas of shelving. Repeat as necessary.

To Kill Fleas, Brown Dog and Lone Star Ticks, clean premises thoroughly before treatment. Apply as a spot or crack and crevice treatment to infested areas. Special attention should be given to cracks, crevices and under carpet and rug edges. Also treat animal sleeping quarters, closets, upholstered furniture (with particular attention to seams), beds, under sofas and other furniture. **In animals sleeping quarters, bedding should be replaced with fresh bedding. DO NOT TREAT PETS WITH THIS PRODUCT.** To avoid reinfestation, pets must be treated simultaneously, with an EPA approved insecticide labeled for use on animals. Application should be repeated as necessary. Humans and pets should avoid contact with treated surfaces (rugs, upholstered furniture, etc) until the spray has dried. Do not use this application in nurseries or any area where infants may sleep.

RESIDUAL SPRAY: Aids in the control of cockroaches, crickets, silverfish, spiders, centipedes, millipedes, earwigs, sowbugs. Kills up to 4 weeks. Apply on baseboards, cracks and crevices, around door and window frames, and other hiding places such as closets, in back of and under appliances, sinks and cupboards in kitchens and bathrooms. In basements, apply in hiding places in cracks and crevices, lower walls and dark places. Spray surfaces until wet, but not to the point of run-off. Treat on a monthly basis or as necessary.

PESTS OUTDOORS: To control ants, clover mites, crickets, earwigs, millipedes, sowbugs, houseflies, mosquitoes, wasps, hornets and small flying moths by application as a residual spray or with a paint brush to outside surfaces of buildings, including porches, screens, window frames, around light fixtures, eaves, patios, garages, refuse dumps and other areas where these pest congregate or have been seen. Do not treat or allow the spray to contact desirable plants (lawns, flowering plants, shrubs, trees, evergreens, etc.) because of possible injury. Repeat treatment as needed to maintain effectiveness.

To help prevent infestation of buildings by ants, crickets, earwigs and sowbugs, (pillbugs), treat a band of soil 5 to 10 feet wide around and adjacent to the buildings also the building foundation to a height of 2 to 3 feet, where pests are active and may find entrance. Use 7.7 ounces of this product per gallon of water and apply as a coarse spray at the rate of about 128 ounces per 100 sq. ft. to thoroughly and uniformly wet the band.

FLEAS, CHIGGERS, ANTS AND TICKS: For treatment of localized infestations of these insects in outdoor areas, spray weeds and bush non-crop areas around the home thoroughly. Avoid spraying desirable plants. For ants, thoroughly wet hills and runways. Repeat applications as infestations warrant and as reinfestations occur.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE AND SPILL PROCEDURES: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

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

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONTAINERS OF GALLON AND SMALLER: Do not reuse container. Wrap container in several layers of newspaper and discard in trash collection.