

28 JAN 1996

Judy De Sadier
Entech Systems Corporation
607 Maria Street
Kenner, LA 70062

Dear Ms. De Sadier:

Subject: Amended Labeling
Resmethrin Insect Spray
EPA Registration Number 40391-4
Submission Dated January 9, 1996

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:

1. Revise the Ingredients Statement so that the percentage of active ingredient and inert ingredients totals 100.0%. The proposed label indicates a total of 99.8%.

2. Add the following statement immediately below the Ingredients Statement as a footnote to the inert ingredients:

"Contains petroleum distillates, xylene or xylene range aromatic solvent."

3. Delete the sentence "NOTICE: This product contains petroleum distillates and may be hazardous to health if inhaled."

4. Revise the Statement of Practical Treatment to read as follows:

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

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

5. Revise the Precautionary Statement to read as follows:
"Harmful if swallowed or inhaled. Avoid breathing spray mist. Wear mask or respirator of a type recommended by the U.S. Bureau of Mines to give adequate protection against this material. Avoid contact with skin, eyes or clothing. Remove contaminated clothing and wash clothing before reuse. Wash skin thoroughly with soap and water after handling."
6. Revise the heading of the Physical Hazards statement to read "Physical or Chemical Hazards".
7. Move the Storage and Disposal section from the Precautionary Statement to the Directions for Use. Add the heading "Storage and Disposal" to this statement.
8. Separate the sentence "It is a violation of Federal law to use this product in a manner inconsistent with its labeling." from the first paragraph of the Directions for Use so that it appears as a separate paragraph at the beginning of this section.
9. Remove the occurrence of the statement "In hospitals, patients . . . cover fish aquariums before spraying." from the Directions for Use as an indoor spray. These directions already appear at the beginning of the Directions for Use section.
10. Revise the sentence "After space spraying . . . food will be handled." to read as follows:
"After space spraying in meat packing plants, bakeries, and other food processing plants, wash all equipment, benches, shelves, etc. where food will be handled thoroughly with an effective cleaning compound followed by a rinse with potable water before reuse."

A stamped copy of the label is enclosed for your records. Submit three copies of final printed labeling prior to releasing product for shipment.

If you have any questions or comments, please contact me at (703) 305-6788.

Sincerely,

RPK

Richard P. Keigwin, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division (7505C)

PRECAUTIONARY STATEMENT

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Do not breathe spray mist. Wear mask or respirator of a type recommended by the U.S. Bureau of Mines to give adequate protection against this material. Wash hands, arms and face with soap and water after handling and before eating or smoking. Wash all contaminated clothing with soap and water before reuse.

ENVIRONMENTAL HAZARD

"Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters."

PHYSICAL HAZARD

Keep container closed. Do not pour, use, spill or store near or open flame.

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

Container Disposal: Triple rinse or equivalent then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not remain in treated areas. Ventilate the area thoroughly before re-entry. In hospitals, patients should be removed from rooms prior to treatment. Rooms should be ventilated for 2 hours after spraying. Do not return patients to room until after ventilation. Remove pets, birds and cover fish aquariums before spraying.

ENTECH

RESMETHRIN INSECT SPRAY

Contains Resmethrin (SPB-1382[®]) 403

An insecticide for control of flying and crawling insects in dairies, meat processing plants, food plants and storage warehouses, hospitals, hotels, restaurants, schools, homes and similar establishments with automatic or manual fogging equipment or sprayers. Authorized by USDA for use in federally inspected meat and poultry plants.

ACTIVE INGREDIENTS:

RESMETHRIN..... 0

INERT INGREDIENTS 99

100

*Cis/Trans isomers ratio: max. 30% (±) cis and min. 70.0% (±) trans.

+ U.S. Patent No. 3, 465, 007

NOTICE: This product contains petroleum distillates and may be hazardous to health if inhaled.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED, Call a physician or Poison Control Center immediately.

DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

DO NOT give anything by mouth to an unconscious person.

IF INHALED, Remove victim to fresh air. Get medical attention.

IF ON SKIN, Remove contaminated clothing and wash affected areas with soap and water. Get medical attention if irritation persists.

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

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

FORMULATED BY: ENTECH SYSTEMS CORPORATION, 607 Main Street
TOWN, STATE: Kenner, LA 70062 (504) 469-5541

EPA Reg. No. 40391-4

EPA Est. No. 40391-L

NET CONTENTS: 1 5 30 55 GALLONS

STATEMENT
DOMESTIC ANIMALS

Use of respirator of a type
approved to give adequate
protection to hands, arms and face
before and after eating or
drinking with soap and water

HAZARD
In areas where surface
water is below the mean high
water mark, by cleaning of equip-
ment and waters.

USE
Do not use, spill or store near

Do not feed by storage or
use of equivalent then offer for
sale and dispose of in a
manner approved by state

Do not use from the use of this
product at an approved waste

USE
Use this product in a manner
approved in treated areas.
Do not re-entry. In hospitals,
before and after treatment
after spraying. Do not
ventilate. Remove pets,
birds and cover fish aquariums
before spraying.

ENTECH

In EPA... listed
JAN 1985

RESMETHRIN INSECT SPRAY

Contains Resmethrin (SPB-1382) 40391-4

An insecticide for control of flying and crawling insects in dairies, meat packing plants, food plants and storage warehouses, hospitals, hotels, restaurants, schools, homes and similar establishments with automatic or manual fogging equipment or sprayers. Authorized by USDA for use in federally inspected meat and poultry plants.

ACTIVE INGREDIENTS:

RESMETHRIN	0.3%
INERT INGREDIENTS	99.5%
	100.0%

*Cis/Trans isomers ratio: max. 30% (±) cis and min. 70.0% (±) trans.

+ U.S. Patent No. 3, 465, 007

NOTICE: This product contains petroleum distillates and may be hazardous to health if inhaled.

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED, Call a physician or Poison Control Center immediately. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia. DO NOT give anything by mouth to an unconscious person.

IF INHALED, Remove victim to fresh air. Get medical attention.

IF ON SKIN, Remove contaminated clothing and wash affected areas with soap and water. Get medical attention if irritation persists.

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

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

FORMULATED BY: ENTECH SYSTEMS CORPORATION, 607 Main St.
TOWN, STATE: Kenner, LA 70062 (504) 469-6541

EPA Reg. No. 40391-4

EPA Est. No. 40391-LA-1

NET CONTENTS: 1 5 30 55 GALLONS

FOR CONTROL OF FLIES, MOSQUITOES, AND GNATS
in homes, hospitals, food establishments, farm buildings and
houses. Close all windows and stop all ventilators. Pilot light
should be extinguished. In hospitals, patients should be removed
from room prior to treatment. Rooms should be ventilated for
hours after spraying. Do not return patients to room until a
ventilation. Remove pets, birds and cover fish aquariums before
spraying. Allow only fine mist or "dry" fog to contact fabric
surfaces that might be affected by the oil base. Direct fine mist
or fog upward toward the center of the room and around
sides until the area is filled with fog or mist particles. Keep area
closed for 10 to 15 minutes. Do not remain in treated areas. Ven-
tilate the area thoroughly before re-entry. Clean up and destr
fallen insects. Resmethrin Insect Spray is acceptable by t
USDA as a pesticide for use in all areas of official establishmen
operating under the Federal meat, poultry, shell egg grading a
egg products inspection programs.

CONTACT AND SPRAY - TO KILL COCKROACHES,
CONFUSED FLOUR & SAWTOOTHED GRAIN BEETLES,
CENTIPEDES, EARWIGS, GRAIN MITES, SOWBUGS, AND
SPIDERS IN SHELTERED SITUATIONS. Adjust spraying
device to deliver a coarse wet spray. Apply as a contact spray
to hit as many insects as possible underneath refrigerators
and around pallets, and in most areas around sinks and pipes.
Apply to storage areas, baseboards, and the inside surfaces
of boxcars and trucks at a rate of 1 gallon to 1,000 sq. ft.
Apply into cracks and crevices, in points between equipment
and floors, equipment legs and bases, conduits, motor hous-
ings, and junction or switch boxes. Prior to application, de-
energize equipment. After application, allow time for oil to
evaporate before starting motors or placing switches in "on"
position. Contact as many insects as possible. Apply as a
space spray at the rate of 1 fl. oz. per 1,000 cu. ft. of room
space. Repeat dosage as necessary for control. Leave the
room closed for 1 hour. Do not remain in treated area. Ven-
tilate the area thoroughly before re-entry. Do not apply directly
to food. In commercial food handling facilities, cover or
remove any food and food processing equipment during
application. Do not apply while food processing is under way.
After space spraying in meat packing plants, bakeries, and
other food processing plants, wash with potable water all
equipment, benches, shelving, etc., where exposed food will
be handled. In the home, all food processing surfaces and
utensils should be covered during treatment or thoroughly
washed before use. Remove pets and birds, and cover fish
aquariums before spraying.