

OCT 16 1995

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Eliot Harrison
Delta Analytical Corporation
7910 Woodmont Avenue
Suite 1000
Bethesda, MD 20814

Dear Mr. Harrison:

Subject: Safer[®] Soap and Pyrethrum Concentrate
EPA Registration No. 42697-34
Response to SOAP SALTS RED

Based on your response to the Soap Salts Reregistration Eligibility Document, the labeling referred to above is acceptable provided that you make the following changes:

1. The precautionary statements must state:

"Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals."

2. The statements of practical treatment must state:

"If on skin: Wash with plenty of soap and water. Get medical attention.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists."

The submitted label includes the following statement of practical treatment:

"If swallowed: Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Do not administer liquids to an unconscious person."

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The need for this statement is not supported by the data submitted; however, you may retain this statement if you choose to do so. If you choose to keep this statement on the label, you must add to it: "Get medical attention."

3. Submit one copy of your final printed labeling before you release the product for shipment.

Please note: This product will be considered for reregistration after other Pyrethrin products have gone through the reregistration process.

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

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

Robert A. Forrest
 Product Manager (14)
 Insecticide-Rodenticide Branch
 Registration Division (7505C)

Enclosure

CONCURRENCES								
SYMBOL								
SURNAME								
DATE								

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ACCEPTED
with COMMENTS
in EPA Letter Dated

OCT 16 1995

Front Panel:

Patented Formula
Quick Knock-down!
Reliable.
Kills Japanese Beetles on Contact!
Kills on Contact!
Use up to day of harvest!

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
42697-34

Safer® Soap and Pyrethrum Insect Killer
Concentrate

Kills: Beetles, Caterpillars, Aphids, Whiteflies, Sawflies,
Scales, Wasps, Hornets, Ants, Fleas, Ticks, Billbugs, Chinch bugs,
Japanese Beetles, Sod Webworms, Sowbugs, Earwigs and other listed
pests.

For use on houseplants, flowers, herbs, berries, fruits,
vegetables, shade trees, evergreens, ornamentals, cacti and
succulents, and lawns, grown in and around the home and home
greenhouses and other interior plantings. Use up to day of
harvest.

For use on pets, pet bedding or favored resting places, nearby
cracks and crevices, along baseboards, moldings and localized areas
of flooring and floor coverings, to kill Fleas, Ticks and other
listed pests.

ACTIVE INGREDIENTS:

Pyrethrins.....0.20%
Potassium Salts of Fatty Acids.....20.00%
INERT INGREDIENTS:.....79.80%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements.

Net Contents: 8 fl. oz., 16 fl. oz., 32 fl. oz., 64 fl. oz.,
1 gallon

General: Safer® Soap and Pyrethrum is a patented formula that
utilizes Safer® Insecticidal Soap to desiccate the cuticle of the
insect, plus pyrethrin to attack the insect's nervous system. The
combination of these ingredients is synergistic (the effect of the
two ingredients together is greater than either used individually).
The result is a more reliable insecticide with the benefit of
immediate kill from pyrethrum.

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Back Panel:

Safer® Soap and Pyrethrum Insect Killer
Concentrate

Precautionary Statements
Hazards to Humans and Domestic Animals:

CAUTION: Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of feed and foodstuff.

STATEMENT OF PRACTICAL TREATMENT (First Aid): If swallowed: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink a large quantity of water. Do not administer liquids to an unconscious person. If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists. If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

This product is 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. Do not contaminate water when disposing of equipment washwaters. Cover fish aquaria before spraying adjacent area.

STORAGE AND DISPOSAL

STORAGE: Protect from freezing. If frozen, thaw and shake well. DISPOSAL: Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash.

DIRECTIONS FOR USE

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

Always use freshly mixed solution. Use soft water wherever possible. Use with caution on new tender foliage, and avoid spraying plants in full sun.

For plant use mix one part concentrate to twenty parts water or 5 fl. oz. (10 Tbsp.) per gallon of water.

Use as directed above on vegetables, including: asparagus, beans, broccoli, Brussels sprouts, cabbage, kale, and oriental vegetables, herbs, lettuce, eggplant, peppers, tomatoes, potatoes, cucumbers, melons and squash to control ASPARAGUS BEETLES, BEAN BEETLES, COLORADO POTATO BEETLES, CUCUMBER BEETLES, FLEA BEETLES, CATERPILLARS (including CABBAGE LOOPERS, IMPORTED CABBAGEWORM, ARMYWORMS, HORNWORMS, DIAMOND BACK MOTH LARVAE), LEAF HOPPERS, PLANT BUGS, PSYLLIDS, APHIDS AND WHITEFLIES. Use up to day of harvest.

Use as directed above on Fruit and Nuts, including: apples, avocados, citrus (grapefruit, lemons, oranges, tangerines, limes), peaches, nectarines, apricots, pears, almonds, pecans, walnuts, kiwi fruit, blackberries, logan berries, raspberries, strawberries and grapes to control JAPANESE BEETLES, FLEA BEETLES, WEEVIL ADULTS, CATERPILLARS (including NAVAL ORANGE WORM, BAGWORMS, LEAFTIERS, CODLING MOTH, and TENT CATERPILLARS), APHIDS, LEAFHOPPERS, PSYLLIDS, SCALE CRAWLERS, and SAWFLY LARVAE. Use up to day of harvest.

Use as directed above on Lawns and Turf Grass: to control CINCH BUGS, LAWN MOTH, SOD WEBWORM, ARMY WORMS, and other miscellaneous pests.

Use as directed above on Ornamental Trees and Shrubs, including: azaleas, camellias, cacti, dogwood, rhododendrons, evergreens, and broad-leaved shade trees to control APHIDS, BEETLES, CATERPILLARS (including GYPSY MOTH LARVAE, TENT CATERPILLARS, WEBWORMS, BAGWORMS and LEAFTIERS), LACE BUGS, BOX ELDER BUGS, LEAFHOPPERS, PSYLLIDS, SAWFLIES, SCALES and WOOLY ADELGIDS.
CAUTION: Do not use on Japanese Maple, horse chestnut, or mountain ash.

Use as directed above on Flowers, including: asters, carnations, chrysanthemums, geraniums, marigolds, petunias, and roses to control APHIDS, BEETLES (including FLEA BEETLES and JAPANESE BEETLES), CATERPILLARS, PLANT BUGS, and WHITEFLIES.
CAUTION: Do not spray blooms or partially open flower buds. Do not use on bleeding heart or gardenias. Test on fuschias and impatiens for varietal sensitivity.

Use as directed above on houseplants: to control APHIDS, CATERPILLARS and WHITEFLIES. Apply when insects or signs of damage are first sighted. Thoroughly moisten all plant surfaces. Repeat treatment at 7 to 10 day intervals or as needed.
CAUTION: Do not use on Crown of Thorns, jade plant, or delicate ferns. Test on begonias, fuschias and impatiens for varietal sensitivity.

Households: Use as directed above in the household or outdoors to control WASPS, HORNETS, ANTS, EARWIGS, TICKS, FLEAS and SOWBUGS. Apply spray directly to the insects, their nests or their hiding places.

To control adult mosquitos: Mix one part concentrate to forty parts water, or 2.5 fl. oz. (5 Tbsp.) per gallon of water. Apply dilute spray in early morning to foliage where mosquitos are resting or as a fine aerial application to evening flying adults.

For use on Pets and premises (Pet areas): Mix one part concentrate with twenty parts water or 6 fl. oz. (12 Tbsp.) per gallon of water. Apply dilute spray to achieve thorough coverage of area infested with FLEAS, TICKS or LICE.

To control fleas, ticks and lice on pets: Begin spraying at tail and progress quickly over the rest of the animal, being sure to cover the entire body including legs and feet. While spraying, fluff the fur so that spray can soak the animal. Repeat as necessary. CAUTION: Do not get spray in the animal's eyes, mouth or ears. Do not spray genital area. Do not spray nursing females or animals under six weeks of age. If animal shows any signs of dermal irritation, discontinue use and bathe animal with a mild shampoo.

To control fleas, ticks and lice on premises: Thoroughly spray infested areas including pet bedding, favored resting places, nearby cracks and crevices, along baseboards, moldings, localized areas of floorings and floor coverings. Place clean bedding in pet's quarters and launder or air dry sprayed bedding. Concurrent treatment of animals and premises will produce best results. Reapply every seven days to kill newly hatched individuals.

Coverage:

<u>Bottle Size</u>	<u>gal. finished product @ 5 oz/gal.</u>	<u>gal. finished product @ 2.5 oz/gal.</u>
8 fl. oz.	1.60 gal.	3.20 gal.
16 fl. oz.	3.20 gal.	6.40 gal.
32 fl. oz.	6.40 gal.	12.80 gal.
64 fl. oz.	12.80 gal.	25.60 gal.
1 gal (128 fl. oz.)	25.60 gal.	51.20 gal.
3 gal.	76.80 gal.	153.60 gal.
5 gal.	128.00 gal.	256.00 gal.
55 gal.	1408.00 gal.	2816.00 gal.

