

FEB 23 1995

Mr. Robert B. Adams
CTX, Inc.
481 Scotland Road
McHenry, Illinois 60050

Dear Mr. Adams:

Subject: Revised Labeling, Confidential Statement of Formula
Chem-Tox Roach & Ant Spray with Baygon®
EPA Registration No. 45385-1
Your Submission Dated December 13, 1994

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

At the next printing of your label, please make the following corrections:

1. Amend the general information in the directions for use ("In addition to rapid initial kill, Baygon Spray...") by changing the reference to "Baygon Spray" to the actual name of this product.
2. Delete the word "Flammable" from the Physical or Chemical Hazards section. According to the Confidential Statement of Formula, the flash point of this formulation is 176°F. Please refer to section 156.10 (i)(iii) of Title 40 of the Code of Federal Regulations, the table in this section, indicates that for flash points > 150°F, "flammable" is not appropriate.
3. No. 16 of the "Precautions" should be located in the Physical or Chemical Hazards section.

The Confidential Statement of Formula (CSF) included in this submission is NOT acceptable. The active ingredients in this product include propoxur, pyrethrins, and piperonyl butoxide, however, the CSF does not list a source for the pyrethrins and

the piperonyl butoxide. Additionally, block no. 17 on the CSF states that the weight of the formulation is 1000 lbs., this is incorrect, the total weight is 1100 lbs. At this weight, the 5.2 lbs. of the technical source for propoxur is insufficient to support the label claim. You must resubmit a revised, corrected CSF within 30 days of the date of this letter.

If you have any questions regarding this letter, you may contact me at (703) 305-6386.

Sincerely,

DHE

Dennis H. Edwards, Jr.
Product Manager 19
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

3 of 4
CHEM•tox™

DIRECTION FOR USE

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

STORAGE AND DISPOSAL

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

Storage:

Store in original container in a locked storage area.

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 by other procedures approved by State and Local authorities. Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area. Handle and open container in a manner as to prevent spillage. If container is leaking invert to prevent leakage. If container is leaking or material is spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to precautionary Statements on label of hazards associated with handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticide above. In spill or leak incidents, keep unauthorized people away.

10/93

Direction for use continued on back panel.

**ROACH & ANT
SPRAY**



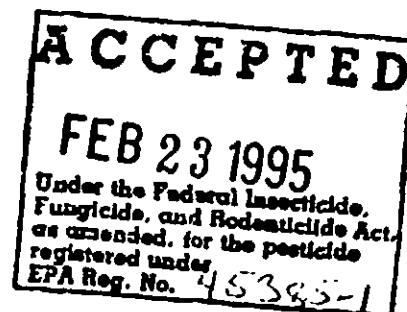
contains **BAYGON®**

**kills: Resistant Roaches plus ANTS, WATER
BROWN DOG TICKS, SILVERFISH, SPIDERS and**

Quick acting Surface Spray for INDOORS and

Net 1 Gallon / 3.785 Liters

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DIRECTION FOR USE continued

APPLICATION: Read the entire directions and conditions of Sale before using.

This spray is a highly effective formulation which provides rapid kill of such crawling insects as listed below, including those resistant to certain chlorinated hydrocarbon and phosphate insecticides:

ANTS, FLEAS, BROWN DOG TICKS, FLIES, FLOEY MITES, HORNETS, CRICKETS, MILLIPEDS, SOW BUGS, EARWIGS, MOSQUITOES, SPIDERS, ROACHES WATERBUGS, WASPS, SAW-TOOTHED GRAIN BEETLE (exposed), SCORPIONS. In addition to rapid initial kill, Baygon Spray stays on treated surfaces and kills insects many weeks after the spray deposit has dried.

HOW TO USE:

This product is ready to use undiluted as it comes from the container, and must be applied with either power-operated or hand pressurized sprayers. This product shall NOT be distributed, sold, or used with finger-operated trigger sprayers. Apply as a coarse spray to surfaces until wet, moving the spray stream rapidly enough to prevent excessive wetting of surfaces and waste of material.

INDOOR USE:

Spray into cracks, crevices, around baseboards, and other places where these insects hide. Apply behind and beneath cabinets, refrigerators, sinks, stoves, and in and around waste containers. For ants, spray trails and places where ants enter premises. Repeat as needed. Do not spray foodstuffs or house plants. Remove pets and cover fish bowls before spraying. Application may be made to floor surfaces along baseboards and around air ducts, however, do not treat entire area of floor or floor coverings. Do not allow children to contact treated surfaces until surfaces are completely dry.

BROWN DOG TICKS:

Spray sleeping quarters of pets, around baseboards, window and door frames, wall cracks, and local areas of floors. Repeat as needed. Fresh bedding should be placed in animal quarters after spraying. Do not spray animals.

OUTDOOR USE:

Spray thoroughly those areas where pests have been seen or found including outside surfaces of screens, doors, window frames, foundations, patios, or other places where insects may enter. For ants, spray runways. For control of wasps and

hornets apply after dark when all of the insects have returned to the nest. Repeat as necessary. Do not spray vegetation

Precautions:

1) Do not use this product indoors as an overall surface spray or as a space spray; take care not to introduce this product into the air during application. 2) Use only in well-ventilated areas. 3) Do not apply where children are likely to frequently contact treated surfaces. 4) Remove or cover fish bowls and remove pets before application. 5) Do not treat pets or plants with this product. 6) Do not allow children or pets in treated areas until spray has dried. 7) If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again. 8) Do not apply directly to carpets or floor coverings and avoid excess wetting of asphalt tile, rubber, and plastic materials because damage may occur. 9) Care should be taken to avoid spotting of walls, wall coverings, and fabrics. 10) Do not apply directly to upholstery or furniture. 11) Do not apply to areas, surfaces, or utensils which contact food or feed. 12) Exposed food should be covered or removed during application. 13) All food processing surfaces and utensils should be covered during application or thoroughly washed with soap and water before use. 14) Do not use in edible products area of food processing plants, restaurants, or other areas where food or feed is commercially prepared or processed. 15) Do not use in serving areas while food is exposed. 16) Do not use this product in conduits, motor housings, or electrical switch boxes.

Condition of Sale: The directions on this label were determined through research to be the directions for correct use of this product. This product has been tested for a range of conditions similar to those conditions that are ordinary and customary in the area where the product is used. Insufficient control of pests may result from failure to follow label directions. In addition, failure to follow label directions may cause injury to animals, man, or the environment. The Seller offers, and the Buyer accepts and uses, this product subject to the conditions that failure to follow label directions are beyond the control of the Seller and are, therefore, the responsibility of the Buyer.

PRECAUTIONS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Avoid breathing of spray mist and contact with skin, eyes, or clothing. Avoid contact with food, dishes, and food preparation areas. Do not contaminate food or feed. Keep out of reach of children. Wash hands, arms and face thoroughly with soap and warm water after handling. Wash contaminated clothing with soap and hot water before reuse. Remove pets and cover fish aquarium before spraying. Do not allow children or pets to contact treated surfaces until they are dry.

STATEMENT OF PRACTICAL TREATMENT

In case of poisoning, call a physician immediately. Have patient lie down and keep quiet. If swallowed - Call a physician or Poison Control Center. Do not induce vomiting. Vomiting may cause an acid burn hazard.

If inhaled - Remove victim to fresh air. Give artificial respiration, preferably mouth to mouth, and keep patient warm. Call a physician.

If on skin - Wash with soap and water. Do not use solvents. Call a physician.

If in eyes - Wash with plenty of water. Do not use solvents. Call a physician.

SYMPTOMS OF POISONING: A sense of "burning" in throat, sweating, constricted pupils, stomach pains, vomiting and diarrhea.

NOTE TO PHYSICIAN: Antidote - Administer atropine sulfate in therapeutic doses. Repeat as necessary to the point of tolerance. Compound inhibits cholinesterase resulting in stimulation of the central nervous system, the parasympathetic nervous system and the somatic motor nerves. Do not give morphine. Watch for pulmonary edema which may develop in serious cases of poisoning even after 12 hours. At first sign of pulmonary edema, the patient should be placed in an oxygen tent and treated symptomatically.