

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



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

SEP 25 2008

CTX-Cenol, Inc.
c/o H. R. McLane
7210 Red Road, Suite 206A
Miami, FL 33143-5321

Dear Mr. McLane:

Subject: Label amendment in response to propoxur RED and efficacy DCI
Chem-Tox Roach and Ant Spray with Baygon
EPA Registration No. 45385-1
Submission Date: September 11, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following changes before you release the product for shipment bearing the amended labeling:

- Change all references to "roaches" and "resistant roaches" so they read "**German roaches.**"
- Change all references to "ants" so they read, "**ants (excluding fire, harvester, carpenter, and pharaoh ants).**" These types of ants require additional data.
- Change all references to "spiders" so they read, "**spiders (excluding brown recluse spiders).**"
- Add the following statements to the front panel:
 - o For use in commercial and industrial buildings, including the non-food areas of food-handling establishments (non-food areas are garbage rooms, entries and vestibules, lavatories, floor drains, offices, locker rooms, boiler rooms, machine rooms, garages, mop closets, storage after canning/bottling, warehouses where food is not exposed, ships, trains, trucks).
 - o "Do not spray product on indoor residential use sites, schools, day care facilities, motels, hotels, and other indoor locations where children may be present."
- Revise the sentence directly above the ingredients statement so it reads, "See side panels for **First Aid** and additional Precautionary Statements."

- Revise and place the following text as a separate section after the Hazards to Humans and Domestic Animals section:

Personal Protective Equipment (PPE):

Applicators and all handlers must wear:

- Long-sleeved shirt and long pants,
- Socks and shoes, and
- Chemical resistant gloves made of barrier laminate, nitrile rubber, neoprene rubber, or viton.

Follow manufacturer's requirements for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

- Revise and place the following text as a separate section after the PPE sections:

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

- Move the last four sentences under the Hazards to Humans and Domestic Animals section and place them under the Directions for Use.
- Under the Note to Physician, revise the first two sentences as follows: "Contains petroleum distillate - may pose an aspiration pneumonia hazard. Contains an N-methyl carbamate that inhibits cholinesterase."
- Under the Directions for Use, delete the following statement: "This spray is a highly effective formulation that provides..." or revise as follows: "This spray provides rapid kill of listed crawling insects."
- Under the Directions for Use, delete the following statement: "In addition to rapid kill, ROACH AND ANT SPRAY with BAYGON stays on treated surfaces and kills insects many weeks after the spray deposit has dried." The data submitted do not support residual or control claims.
- Add the following statements under the Directions for Use: "Will only kill pests present at the time of application. Pests must be directly contacted to be effective. Contact as many pests as possible."
- Delete all references to "wasps," "hornets," "mosquitoes," and "scorpions."

- Under the Indoor Use paragraph, delete the reference to "house plants," as house plants implies residential use.
- Under the Brown Dog Ticks paragraph, add the following text as the first sentence: "For use in kennels." Also, change the word "pets" to "animals."
- Under the Precautions section, replace the word "should" with "must" so the statements are mandatory rather than advisory. Replace "Take care not to" with "Do not."
- Under the Conditions of Sale, insert the following text before the last sentence so it reads, "**To the extent consistent with applicable law**, the Seller offers, and the Buyer accepts..."

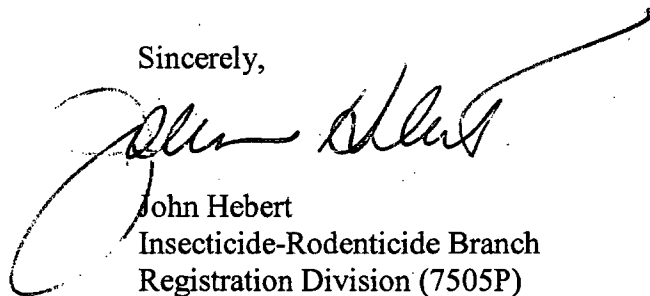
Approval of this labeling amendment does not constitute approval of your application for reregistration of this product. Product reregistration is currently pending and future labeling amendments and/or additional data may be required.

A stamped copy is enclosed for your records. Please submit two (2) copies of your final printed labeling before releasing the product for shipment. The following provisions apply to existing stocks:

- If you formulate your end-use product with technical product purchased prior to January 31, 2009 that IS NOT labeled with the prohibition on indoor residential spray use, then you may label your product with existing stocks for up to 12 months after the date of this amendment letter.
- If you formulate your end-use product with technical product purchased prior to January 31, 2009 that IS labeled with the prohibition on indoor residential spray use, then you may not use existing stocks of labels that allow for indoor residential use. You must use the new, stamped label that is enclosed with this amendment letter.
- If you formulate your end-use product with technical product purchased after January 31, 2009, then you may not use existing stocks of labels that allow for indoor residential use. You must use the new, stamped label that is enclosed with this amendment letter.

If you have any questions regarding this label, please contact Julie Chao at (703) 308-8735 or chao.julie@epa.gov.

Sincerely,



John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed, inhaled or absorbed through skin. Avoid breathing of spray mist and provide adequate ventilation of area being treated. Contact with skin, eyes or clothing should also be avoided. Wear long-sleeved shirt and long pants, chemical-resistant gloves, and shoes plus socks when making application. Wash thoroughly after using. Avoid contamination of food, utensils and food preparation areas. Do not contaminate food or feed. Keep out of reach of children. Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove protective clothing and equipment immediately after handling this product. Wash outside of gloves before removing. Keep and wash protective clothing and equipment separately from other laundry. Remove pets and cover fish aquariums before spraying. Do not apply this product in a way that will contact any person or pet, either directly or indirectly. Keep people and pets out of the area during application. Do not allow people or pets to contact treated surfaces until they are dry.

FIRST AID

IF SWALLOWED - Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES - Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

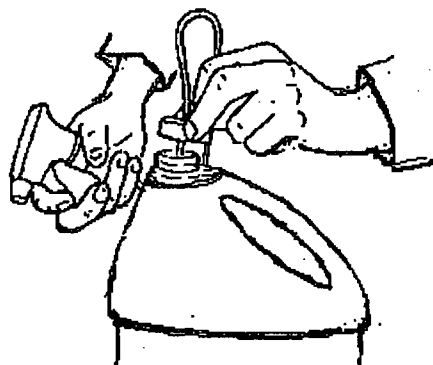
IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have this product container or label with you when calling a poison control center, or doctor, or when going for treatment. You may also call 1-800-858-7378 for emergency medical treatment advice

NOTE TO PHYSICIAN: Solvent presents aspiration hazard. Compound inhibits cholinesterase. Antidote - Administer atropine sulfate in therapeutic doses. Repeat as necessary to the point of tolerance.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and aquatic invertebrates. Birds and small mammals feeding on treated areas may be killed. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply as a landscape treatment (to lawns, shrubs, trees, or garden plants). DCI-4-11-8



OPTIONAL SPRAYER DIAGRAM

CHEM^otox[™]

FOR COMMERCIAL INDUSTRIAL USE ONLY

ROACH & ANT SPRAY

with **BAYGON®**

Kills: RESISTANT ROACHES, plus ANTS, WATERBUGS, BROWN DOG TICKS, SILVERFISH, SPIDERS AND CRICKETS



Quick Acting Surface Spray for INDOORS AND OUTDOORS

KEEP OUT OF REACH OF CHILDREN CAUTION

STOP: Read Label Before Use

See side panels for additional Precautionary Statements.

ACTIVE INGREDIENTS:

Propoxur- CAS[114-26-1]- - - - - 0.500%

Pyrethrins CAS[8003-34-7] - - - - - 0.052%

Piperonyl Butoxide -CAS[51-03-6] - 0.262%

OTHER INGREDIENTS*:- - - - - 99.186%

Total 100.000%

*Contains Petroleum Distillate
BAYGON® is Registered Trademark of
BAYER Environmental Sciences Corp.

EPA REG. NO. 45385-1 - EPA EST. NO. 45385-OH-01

**Net Contents One Quart
(or 1 Gallon / 3.785 Liters)**

**ACCEPTED
With COMMENTS
In EPA Letter Dated:
SEP 25 2008**

**Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:**

45385-1



**CENOL
INCORPORATED
P.O. Box 472
Twinsburg, OH 44087**

Order Code 0-202

FOR COMMERCIAL INDUSTRIAL USE ONLY

CHEM-tox™

ROACH & ANT SPRAY with BAYGON® EPA Reg. No. 45385-1

PHYSICAL OR CHEMICAL HAZARDS

Keep container away from stoves, radiators, or other hot surfaces. Do not spray or store near open flame. Do not use this product in conduits, motor housings, or electrical switch boxes.

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container in a dry, cool, secured area. Do not contaminate water, foodstuffs, feed, or seed by storage or disposal.

PRODUCT DISPOSAL: As a responsible environmental practice, where possible, it is recommended that all of the contents of the container be used, carefully following label directions and precautions. **CONTAINER DISPOSAL: IF EMPTY:** Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. **IF PARTLY FILLED:** Call your local waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

SPILL: In case of spill, absorb liquid with soil, clay or other absorbent material and dispose of according to PRODUCT DISPOSAL- " IF PARTLY FILLED" directions listed above.

DIRECTIONS FOR USE

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

APPLICATION: Read the entire Directions For Use and Conditions of Sale before using. This spray is a highly effective formulation that 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, CLOVER MITES, HORNETS, CRICKETS, MILLIPEDES, SOWBUGS, EARWIGS, MOSQUITOES, SPIDERS, ROACHES, WATERBUGS, WASPS, SAWTOOTHED GRAIN BEETLES (exposed), SCORPIONS.**

In addition to rapid kill, **ROACH AND ANT SPRAY with BAYGON®** 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 may be applied with either power operated or hand pressurized sprayers.

Apply as a course spray to surfaces until moist, moving the spray stream rapidly enough to prevent excess 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 people or pets to contact treated surfaces until surfaces are completely dry. DCI-09-11-09

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

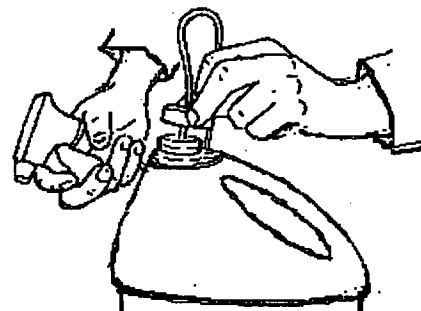
Spray thoroughly those areas where pests have been seen or found including outside surfaces of screens, doors, window frames, foundations, patios, or other places where insects may enter the indoors. For ants, spray ant trails and mounds. For control of wasps, and hornets, apply after dark when all of 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 or pets may 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) If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again.
- (7) Do not apply directly to carpets or floor coverings and avoid excess wetting of asphalt, tile, rubber and plastic materials because damage may occur.
- (8) Care should be taken to avoid spotting of walls, wall coverings and fabrics.
- (9) Do not apply directly to upholstery or furniture.
- (10) Do not apply to areas, surfaces, or utensils which will contact food or feed.
- (11) Exposed food should be covered or removed during application.
- (12) Do not use in edible products areas of food processing plants, restaurants, or other areas where food or feed is commercially prepared or processed.

CONDITIONS OF SALE:

The directions for use 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.



OPTIONAL SPRAYER DIAGRAM

PRODUCT BATCH CODE NO. _____