

SEP 29 1993

Ms. Barbara E. Kairies
Chem-Tox, Inc.
481 Scotland Road
McHenry, Illinois 60050

Dear Ms. Kairies:

Subject: Revised Labeling in Response to Propoxur Data Call-In
Chem-Tox Industrial Insect Spray Contains Baygon
EPA Registration No. 45385-13
Your Application Dated October 12, 1992

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.

Before you release the product for shipment bearing the amended labeling, please make the following additional revisions and corrections:

1. Delete the footnote to the Ingredients Statement which refers to piperonyl butoxide. This product does not contain piperonyl butoxide.

2. Since there are very limited outdoor application sites for this product, the Environmental Hazards statement must be completely revised. It should be simplified to read as follows:

"This product is highly toxic to fish, birds, and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

Any reference to birds feeding in "treated areas" and toxicity to bees should be deleted.

3. Add the heading "Physical and Chemical Hazards" prior to the statement which begins "Keep container away from stoves, radiators, or other hot surfaces..."

4. In the Directions for Use, reference is made to "Baygon Spray." The reference should be to the true product name, ie. "In addition to rapid initial kill, Industrial Insect Spray stays on treated surfaces..."

5. In the paragraph beginning with "How to Use" under the Directions for Use, delete the statement "Direct spray away from people, plants and pets." This statement is inconsistent with the statement "Remove pets and cover fish bowls," which appears in three places on the label. Pointing the spray away from people and pets implies that pets may remain in the treatment areas.

6. Change the word "may" to the word "must" in the sentence regarding application equipment: "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."

Once the label revisions listed above have been made, please resubmit five copies for our files. Additionally, we acknowledge that you have claimed a Generic Data Exemption in your response to the Propoxur Data Call-In. This is acceptable, however, you are also required to submit a current Confidential Statement of Formula (CSF). Please include a copy of the CSF with the revised labels.

Sincerely,

DHE

Dennis H. Edwards, Jr.
Product Manager 19
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

P. 07

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TO

FROM

02:25PM

89-23-1993

CHEM-TOX

Industrial Insect Spray contains Baygon*

KILLS: ANTS, ROACHES, SPIDERS and other CRAWLING INSECTS in and around
Spray only on Surfaces, do NOT use as a Space Spray.

ACTIVE INGREDIENT:

*2-(1-Methylethoxy)phenyl methykarbamate1.00%
+ INERT INGREDIENTS99.00%

*U.S. Patent No. 3,111,539, BAYGON-Reg, US Patent Office Farbenfabriken Bayer A.G. Chemagro Corporation
**Equivalent to 0.21%(butylcarbityl)(6-propylpiperonyl)ether and 0.052% related compounds
+ contains Petroleum Distillate

Keep out of Reach of Children
CAUTION
STOP - Read label before use!

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing of spray mist. Adequate ventilation of area being treated. Contact with skin, eyes, or clothing should also be avoided. Wear protective clothing and gloves. Wash thoroughly after using. Avoid contamination of food, utensils, and food preparation areas. Do not contaminate feed or food. Keep out of reach of children. Wash hands, arms and face thoroughly with soap and warm water after handling. Wash contaminated clothing before reuse. Remove pets and cover fish aquarium before spraying. Do not allow children or pets to contact treated areas until they are dry.

STATEMENT OF PRACTICAL TREATMENT: In case of poisoning, call a physician immediately. Have victim keep quiet. If swallowed - Call a physician or Poison Control Center. Do not induce vomiting. Vomiting may cause more harm. If inhaled - Remove Victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention. If on skin - Wash immediately with soap and warm water. If irritation occurs, get medical attention. If eyes are contacted, flush with plenty of water. Get medical attention.

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SYMPTOMS OF POISONING: A sense of "tightness" in chest, sweating, contracted 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.

ENVIRONMENTAL /PHYSICAL HAZARDS:

This product is highly toxic to fish, birds and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Keep out of lakes, streams ponds, tidal marshes and estuaries. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water by disposal.

This pesticide is highly toxic to bees exposed to direct treatment or to residues on blooming plants where they feed. Do not allow this pesticide to drift to blooming plants if bees are visiting the treatment area. Do not apply this product to, or allow it to drift to, food crops or any desirable vegetation at any time.

Keep container away from stoves, radiators, or other hot surfaces. Do not spray or store near open flame. "Flammable"

DIRECTIONS 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). The 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.

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

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.

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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, CLOVER MITES, HORNETS, CRICKETS, MILLIPEDES, SOWBUGS, 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 may 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. Direct spray away from people, plants, and pets.

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.

EPA Reg. No. 45385-13

EPA Est.No. 45385-1L-01

**Chem-Tox, Inc.
McHenry, IL 60050**

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