



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

March 10, 2004

H.R. McLane
CTX Cenol Corporation
7210 Red Road, Suite 206A
Miami, Florida 33143-5321

Subject: Label Amendment - Updating First Aid Statement per PR Notice 2001-1
and Storage & Disposal per PR Notice 2001-6
CHEM tox Cenol D200
EPA Reg. No. 45385-97
Your Submission Dated December 8, 2003

Dear Mr. Baker:

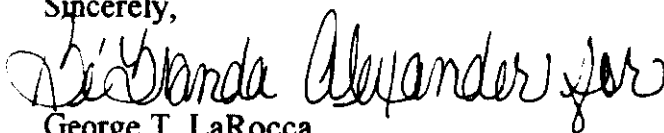
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Revise the last sentence under the third paragraph of the Directions for Use to read, ".... commercially prepared, processed served or stored".
2. Since the product is for outdoor residential use you may replace the second sentence under Environmental Hazards with "Do not apply directly to water".
3. Add the following precaution to the paragraph under Outdoors "Remove all exposed food and cooking utensils. Cover all food handling surface or wash thoroughly after treatment and before use. Do not use on edible crops.
4. Under Termites paragraph delete the last sentence since the recommendation to obtain professional service is already stated in this paragraph.

5. Following the first statement under Hazards to Humans and Domestic Animals add "Wear waterproof gloves when spraying".

Based on the acute toxicity of your product (Toxicity Category IV), you are not required to have a first aid section nor signal word. You may delete these statements if you wish. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in black ink, appearing to read "BeWanda Alexander for", written over the printed name of George T. LaRocca.

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

CENOL D200

INSECTICIDE

For Indoor and Outdoor Use

Ready-To-Use • water- Based • Kills on Contact
Long-Lasting Keeps Killing for up to 16 Weeks
Non-Staining • No Oily Greasy Residue • No Shake
Formula • For Use In and Around Horse Stables • For
Use On House Plants • For Use On Ornamental Plants
• Kills Fleas & Ticks • Kills Home Invading Pests • Kills
Spiders, Centipedes and Scorpions • Kills Roaches,
Ants and Fleas on Contact • Kills Pantry Pests • Kills
Plant Pests • Kills Aphids, Mealy Bugs, Lace Bugs,
Thrips, Leafminers and Mites • Kills Spider Mites •
Kills Japanese Beetles.

Not for Use on Plants Grown for Sale or other Commercial Use.

EPA REG. NO. 45385-97 - EPA EST. NO. 56--OH-01

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panels for additional Precautionary Statements.

ACTIVE INGREDIENT:

Deltamethrin-[CAS 52918-63-5] - - - - 0.02%

OTHER INGREDIENTS: - - - - - 99.98%

Total 100.00%

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Contact with product may result in transient tingling and reddening of the skin. Avoid contact with skin or clothing.

FIRST AID

IF SWALLOWED: Immediately call a Poison Control Center or doctor. Do not induce vomiting unless told to by a poison control center or doctor. Do not give any liquid to the person. 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.

HOT LINE: You may also call 1-800-858-7378 for emergency medical treatment advice.

Net Contents: 1 Gallon = 3.785 Liters

(With or Without Spray Applicator.)



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

Order Code W-200

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAR 10 2004

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

45385-97

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. 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 dump leftover pesticide or rinse water into drains or sewers. **BEE WARNING:** This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the proposed treatment area.

Physical or Chemical Hazards

Do not apply this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. D200 is Ready-To-Use. **General Information (for unit furnished with a sprayer, hold container upright and turn nozzle to "on" position) For the Refill Container or product without sprayer attached,** place CENOL D200 Insecticide in a suitable trigger or pressure sprayer and apply according to directions for use.). Do not spray up into air. Apply this product only to surfaces as a spot and crack & crevice treatment. Hold approximately 12 inches from surface to be sprayed. Squeeze trigger to spray until surface is slightly moist. CENOL D200's long-lasting action keeps on killing for up to [30, 60, 90, 120, days; 4, 8, 12, 16 weeks; 1, 2, 3, 4 months] after you spray. Contact kill gives you immediate results when spraying insects directly, while residual activity kills insects when they return to treated areas. CENOL D200 will not stain surfaces or fabrics.

CENOL D200 is intended to be used in and around residences and their immediate surroundings such as, (but not limited to), Apartments, Atriums, Attics, automobiles, basements, bathrooms, boats, Cabins, Campers, Carports, Cat sleeping quarters, Clothes Storage, Condominiums, Decks, Dens, Driveways, Garages, Gazebos, Homes, Kitchens, Lanais, Living rooms, Parlors, Patios, Pet sleeping areas, Play Rooms, Porches, Recreational Vehicles, Rooms, Solariums, Storage Areas, Sun rooms, Utility Rooms, and Verandas. Do not use in commercial food handling establishments, restaurants or other places where food is commercially prepared, processed or served.

FOR USE INDOORS: Cockroaches, (including adult and immature stages of both non-resistant and organophosphate and carbamate resistant strains), ants, boxelder bugs, centipedes, crickets, firebrats, fleas, palmetto bugs, silverfish, sowbugs, ticks and waterbugs: Apply as a spot and crack & crevice treatment to areas where these pests crawl and hide; especially in hidden areas around sinks and storage areas, behind baseboards, around doors and windows, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves drawers, bookcases, and similar areas.

Cover all food handling surfaces and cover or remove all food and cooking utensils or wash thoroughly after treatment. Exposed food should be covered or removed. Repeat as necessary but not more than once per week.

ROACHES: Spray in cracks and crevices, around baseboards and other hiding places.

ANTS: Spray around ant trails, doors and windows and other places where ants enter the house. Repeat as necessary but not more than once per week.

CARPENTER ANTS: For effective control, locate and treat nests and surrounding areas. Apply around doors and windows and other places where ants enter premises and where they crawl and hide. Spray into infested wood through existing openings.

Continued on label unit 2 of 2.

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Directions for Use (Continued)

FOR USE INDOORS continued:

TICKS: (Including ticks that may cause Lyme disease) and **Fleas on Surfaces:** Remove pet bedding and destroy or clean thoroughly. Spray pet resting quarters. Adult fleas and larvae contacted by spray will be killed. Put fresh bedding down once spray has dried. Do not spray animals directly. For best results, pets should be treated with an appropriate flea and / or tick control product registered with EPA for use on pets before allowing them to return to the treated area. Spray rugs and carpets where infestations are bad. Delicate fabrics should be tested for staining in an inconspicuous area prior to use.

SPIDERS: Apply along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

CENTIPEDES, GROUND BEETLES, PILLBUGS, SOWBUGS, SCORPIONS AND TICKS: Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

SILVERFISH, CRICKETS, SPIDERS: Apply to areas infested by these pests.

FLYING INSECTS: Houseflies, Gnats, Mosquitoes, and small flying moths: Spray localized resting areas, such as under eaves, porches, inside surfaces of window and door frames, surfaces around light fixtures and cords, railings, etc. and anywhere these insects may rest. Insects coming to rest on treated surfaces will be killed. Spray nesting areas. Insects coming to rest on treated surfaces will be killed.

CORSE STABLES: To control *Stable Flies, Horn Flies, house flies, Face Flies, Horse Flies, Deer Flies, mosquitoes, and gnats.* Apply thoroughly to surfaces until wet. Insects coming to rest on treated surfaces will be killed or repelled. Repeat treatment as necessary but not more than once per week. Do not spray animals or humans, or apply to animal feed or watering equipment.

PANTRY PESTS - Grain Beetles (Rusty, Merchant and Saw-toothed), Flour Beetles (Red and Confused), Cigarette Beetles, Clover Mites, Drugstore Beetles, Elm Leaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths. Treat exposed stages. Remove all food stuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow to dry prior to replacement of shelf paper, food and utensils. Wash any exposed food handling surfaces and utensils before use.

Carpet Beetles: (Black, Furniture and Varied): Spray on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Webbing Clothes Moths: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on clothes. Do not apply to clothing.

Bedbugs: Remove linens and wash before reuse. Lightly spray mattresses, especially tufts, folds and edges. Apply to the interior of the frame. Allow to dry before remaking bed.

OUTDOORS:

Point sprayer away from face. Hold sprayer on a slant downward angle, approximately 12 inches from surface to be sprayed. Spray with wind if breeze is blowing. Do not contaminate fish ponds or apply directly to water.

PESTS ON OUTSIDE SURFACES OF BUILDINGS: For control of building infestation of ants, clover mites, crickets, and Sowbugs (Pillbugs). Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. Apply to outside surfaces of buildings where insects tend to congregate. Spray areas including, (but not limited to), screens, window frames, eaves, porches, patios, garages and refuse dumps. Repeat treatment as necessary but not more than once per week.

CRAWLING INSECTS: ants, cockroaches (including Asian cockroaches), centipedes, crickets, mole crickets, water bugs and silverfish. Spray infested surface of patio or picnic area. Also spray legs of tables and chairs.

WARRANTY STATEMENT

Our recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such, or the results to be obtained if not used in accordance with directions or established safe practices. The buyer must assume all responsibility for, including injury or damage, resulting from its misuse as such, or in combination with other materials.

Directions for Use (Continued)

FOR USE OUTDOORS:

Ants: Spray freely around ant trails and hills. Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray freely on and around debris. Repeat as necessary but not more than once per week.

Lone Star Ticks, Dog Ticks, Crickets and Fleas: Apply thoroughly to infestation in bushes, grass or weeds. Retreat weekly if necessary.

Wasps, Hornets, Yellow Jackets and Bees: Spray nests and other surfaces where bees may rest. Aim spray at nest openings. Applications should be made late in the evening when insects are at rest.

FLYING INSECTS: House flies, gnats, mosquitoes and small flying moths: Spray outside surfaces of windows and door frames and other areas where these pests may enter the home. Also spray localized resting areas such as under eaves, porches, surfaces around Light Fixtures and cords, railings, etc. where these insects may rest. Insects coming to rest on treated surfaces will be killed.

TERMITES, CARPENTER ANTS AND CARPENTER BEES: (For localized control only.) Apply Cenol D200 to voids or channels in damaged wood of a structure, or to cracks, crevices and spaces in and between wooden portions of a structure or between wood portions of the Foundation in locations vulnerable to attack such as crawl spaces. Retreat if needed but not more than once per week. For termites, the purpose of such applications is to kill workers or winged forms which may be present in the treated areas at the time of application. Not recommended as sole protection against termites. For active infestations; get a professional inspection. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but are merely a supplement. For severe termite infestation, contact a professional pest control operator in your area.

HOUSE PLANTS: To control aphids, Japanese beetles, lace bugs, leafminers, mealy bugs, mites and spider mites on house plants. Prior to spraying, remove plants from living and eating areas. Put in an area not likely to come in contact with pets, children or food. Plants can be returned to original location when leaves dry. If plants cannot be moved, cover or remove exposed food and food handling surfaces. Avoid spraying surrounding areas. Apply spray to upper and lower surfaces of foliage. Avoid wetting blossoms if possible. Repeat applications as necessary but not more than once per week.

FOR CONTROL OF ORNAMENTAL GARDEN INSECTS:

For use on roses, dahlias, asters and other ornamentals to kill Japanese beetles hit by spray, as well as whiteflies, aphids, army worms, lace bugs, mealy bugs, exposed thrips, pavement ants, spiders, spider, and red mites, clover mites and leafminers. May be used on plants, as well as a multipurpose spray in small ornamental gardens and for spot treatments to prevent insects from spreading into large garden areas. May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, delphiniums, dogwood, English ivy, euonymus fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, rubber plants, snapdragons, stocks, wandering Jew, and zinnias. When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Be cautious about wetting tender foliage, young plants and new foliage. Do not spray plants when temperatures exceed 90°F. DO NOT apply to vegetable plants or other plants used for food. Spray insects directly, whenever possible. Repeat treatment as necessary but not more than once per week.

STORAGE AND DISPOSAL

PESTICIDE 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.

PESTICIDE 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: Do not reuse this container. Place in trash or offer for recycling if available.

IF PARTLY FILLED: Call your local waste agency or 1-800-253-2687 for disposal instructions. Never place unused product down any indoor or outdoor drain. **SPILL:** In case of spill, absorb liquid with absorbent material such as soil or clay etc. sweep up and dispose of material according to PESTICIDE DISPOSAL - **IF PARTLY FILLED** - directions above. 12-08-03