

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

45987-2

1/21/2003

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JAN 21 2003

Kim Davis  
 Rod Products Company, Inc.  
 c/o RegWest Company  
 30856 Rocky Road  
 Greeley, CO 80631-9375

Dear Ms. Davis:

Subject: Revised Labeling - Corrected Net Contents Statement; Updated Disposal Directions;  
 Revised Precautionary Statements  
 Rodspray Fly, Cockroach & Ant Killer  
 EPA Registration No. 45987-2  
 Your Submissions Dated December 13, 2002 and January 6, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) Delete the claims "Kills Odor-Causing Germs & Viruses Carried by Flies and Roaches" and "Kills Odor-Causing, Insect-Carried Germs & Viruses". Although it is acknowledged that there are instances where a claim such as "kills odor-causing bacteria" may not require efficacy data, the claims above will suggest to the user that this product is effective against germs and viruses. Since germs and viruses are considered to be public health pests, these claims must be substantiated by the appropriate efficacy data.
- 2) The Agency has noted the existence of certain label statements that are considered to be implied safety claims or otherwise inappropriate for pesticide products. Accordingly, the following claims must be deleted:
  - a) Delete the claim "Non-Irritating Orange Fragrance Asthma Sufferer's Love." At your option, the claim "Orange Fragrance" may be retained.
  - b) Delete the claims "Use Around Food, Children, Pets & Fish" and "Use with Confidence Around Food, Children, Pets & Fish".

DK: 305-7546: IRB/PM04

		CONCURRENCES						
SYMBOL	7505C							
SURNAME	D. KENNY							
DATE	1/21/03							

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

Daniel C. Kenny  
Product Manager (04)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

# Rodspray Fly, Cockroach & Ant Killer

Kills Ants, Roaches, Flies & Fleas Fast

~~Kills Odor-Causing Germs & Viruses Carried by Flies & Roaches~~

~~Non-Irritating Orange Fragrance Asthma Sufferer's Love~~

~~Use Around Food, Children, Pets & Fish~~

Made with Pure Orange Peel Extract

Kills & Repels These Insects:

Cockroaches, Ants, Fire & Worker Ants, Flies, Mosquitoes, Fleas in Carpets, Spiders,  
Wasps, Hornets & Yellow Jackets, Flour Beetles in Food Closets, Gnats & "No-Seeums," Ticks

**Active Ingredients:**

d-Limonene .....	4.015%
gamma-lactone .....	0.024%
Peach aldehyde .....	0.049%
<b>Other Ingredients</b> .....	<b>95.912%</b>
<b>Total</b> .....	<b>100.000%</b>

Contains a botanically-derived insecticide  
Contains mineral spirits

Keep Out of Reach of Children

**CAUTION**

Read Directions on Back Before Using

Net Contents: \_\_\_\_ oz. [gal(s).] ( \_\_\_\_ liters)

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
JAN 21 2003  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
45987-2

{Back Panel}

## Rodspray Fly, Cockroach and Ant Killer

Kills & Repels Ants, Roaches & Fleas Indoors & Outdoors

~~Use with Confidence Around Food, Children, Pets & Fish~~

Kill Insects in Kitchens, Schools, Hospitals, Apartments, Restaurants and Food Factories

~~Kills Odor-Causing Insect Carried Germs & Viruses~~

### DIRECTIONS FOR USE

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

**Two-Way Sprayer:** Turn nozzle to **stream** for crack and crevice applications. Turn nozzle to **spray** for surface applications or to kill flying insects.

#### Indoors

**Ants, Roaches & Flies:** In a well-ventilated room, spray away from your face sufficiently to wet, kill and then repel crawling ants, roaches and other listed insect pests (and odor-causing microorganisms they might carry) in homes, restaurants, hospitals, schools, food processing establishments and elsewhere. Spray kitchen cabinets, drawers, closets, under sinks and into wall and floor cracks and crevices in both edible and non-edible product areas of Federally-approved meat, poultry and egg producing establishments. Kill flies and mosquitoes in air and on all surfaces attracting them using the wide spray nozzle setting. Reapply as needed.

**Fleas:** Hold container tilted down away from your face and with a sweeping side-to-side motion and the wide spray nozzle position kill adult fleas hidden in carpets, rugs and dog and cat bedding and under furniture. 16 oz. will kill fleas on contact over a 200 sq. ft. area. Reapply as needed. Before spraying, test a corner of fabric for compatibility.

**Outdoors**

**Crawling & Flying Pests:** Hold container upright and spray away from your face sufficiently to wet, kill and then repel crawling ants, including fire ants, roaches, spiders and flies, "no-seeums," and mosquitoes in air and on surfaces. Thoroughly spray and wet ant trails on sidewalks, paths and buildings and one foot on either side. Spray ground holes where ants live. Spray garbage cans, dumpsters and manure piles to kill flies, roaches and ants and their eggs, larvae and pupae on contact. Using the narrow spray position standing as far away as possible, squirt liquid into hornet, wasp and yellow jacket nests. Do not spray plants or animals.

**Barbeques & Picnics: Control Pesky Insects Outdoors:** Lightly spray tables, BBQs and grills, paths and grass a few minutes or so before your party starts and food is served. Spray all surfaces you wish to keep free of flying and crawling insects. Reapply as needed.

**Storage and Disposal**

**Storage:** Store container in a dry place inaccessible to children. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Made in USA for  
**Rod Products Co., Inc.**  
Boca Raton, FL 33432  
[Comments or Suggestions:] (561) 742-0080

**EPA Reg. No. 45987-2**  
**EPA Est. 44673-CA-1** {or appropriate facility number(s)}

U.S. Patent 5,563,991; other US & Foreign patents pending  
© \_\_\_\_\_ Rod Products Co., Inc.

This product has been accepted by the U.S. Department of Agriculture for use according to label directions in official Federal meat, poultry and egg product establishments.

[ ] Denotes alternate/optional language  
{ } Denotes language that does not appear on the market label