

45987-2

7/13/2004

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JUL 13 2004

Dear Ms. Davis:

Subject: Revised Labeling - Revised Ingredient Statement
Rodspray Fly, Cockroach & Ant Killer
EPA Registration No. 45987-2
Your Submission Dated June 18, 2004

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 claim "Kills Odor-Causing, Insect-Carried Microorganisms" wherever it appears in the labeling. This claim suggests to the user that this product is effective against germs and viruses. Since germs and viruses are considered to be public health pests, the claim must be substantiated by the appropriate efficacy data before it may appear on the labeling.
- 2) Delete the kitchen scene graphic that appears on the labeling. It is understood that this graphic contains a scene including children and food. Pictures of children are unacceptable anywhere on the labeling unless the product is specifically registered for direct application onto children or the product is registered for use in swimming pools. In addition, pictures depicting for food or food contact utensils are unacceptable even if food handling area treatments are allowed on the label. Therefore, the graphic depicting children and food must be removed.

A stamped copy is enclosed for your records. This labeling supersedes all previously approved labeling for this product. 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 (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure
DK: 305-7546: IRB/PM01

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	D. Kenny							
DATE ▶	7/13/04							

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Rodspray Fly, Cockroach & Ant Killer

Kills Ants, Roaches, Flies & Fleas Fast

~~Kills Odor Causing, Insect Carried Microorganisms~~

Orange Fragrance

Made with Pure Orange Peel Extract

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL 13 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
45987-2

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" and Ticks

{Graphic}
Ants & Fire Ants
& Worker Ants

{Graphic}
Roaches

{Graphic}
Flies

Kills & Repels:

{Graphic}
Gnats &
"No-Seeums"

{Graphic}
Wasps

{Graphic}
Hornets &
Yellow Jackets

{Graphic}
Flour Beetles in
Food Closets

& Mosquitoes Ticks Spiders

Use Around Food, Children, Pets and Fish

~~{Kitchen scene graphic}~~

Active Ingredient:

d-limonene	4.015%
Other Ingredients	<u>95.985%</u>
Total	100.000%

Contains a botanically-derived insecticide
Contains mineral spirits

Keep Out of Reach of Children

CAUTION

Read Directions on Back Before Using

Net Contents: ____ fl. oz. [gal(s).] (____ liters)

{Back Panel}

Rodspray Fly, Cockroach and Ant Killer

Kills & Repels Ants, Roaches, Flies & Fleas Indoors & Outdoors

Use around food, children, pets & fish

Kill insects in kitchens, schools, hospitals, apartments, restaurants & food factories

~~Kills odor causing, insect carried microorganisms~~

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, with nozzle pointing away from your face, spray to sufficiently 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 and closets, under sinks and into wall and floor cracks and crevices. Use in both edible and non-edible product areas of Federally-approved meat, poultry and egg producing establishments. Kill flies and mosquitoes in the air and on all surfaces attracting them using the wide-spray nozzle setting. Reapply as needed.

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

Outdoors

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

Barbeques & Picnics: Control Pesky Insects Outdoors: Lightly spray tables, BBQs, 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 cool, dry place. **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.

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 producing establishments.

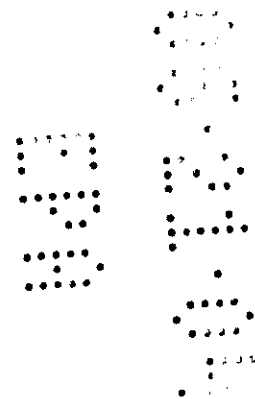
Made in USA [for]
Rod Products Co., Inc.
Boynton Beach, FL 33437
[Comments or Suggestions:] (561) 742-0080
[www.bugsrdone.com]

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

U.S. Patents 5,653,991 & 5,814,325
© ____ Rod Products Co., Inc. [EnviroMan, Inc.]

{Recycle Logo}
Recyclable

{Enviroman Logo}
For a healthier earth



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