

45-987-2

11-22-2006

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

DEC 22 2006

Ms. Kim Davis  
RegWest Company, LLC  
30856 Rocky Road.  
Greeley, CO 80631-9375

Authorized agent for Rod Products

Dear Ms. Davis:

Subject: Label amendment  
Rodspray Fly, Cockroach and Ant Killer  
EPA File Symbol 45987-2  
Your submission dated July 12, 2006

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 comments:

You did not submit the graphic referred to on the front panel. Please note that there must not be any children or food in the graphic with woman spraying cartoon bugs. As indicated to you earlier in our letter dated July 13, 2004 that 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 food or food contact utensils are unacceptable even if food handling area treatments are allowed on the label.

Submit two (2) copies of the final printed label before you release the product for shipment bearing the revised labeling. A stamped copy of the label is enclosed for your records. Please do not hesitate to call me at (703) 308-8291, or e-mail if you have any questions about this letter.

Sincerely yours,

*Rita Kumar*

Rita Kumar  
Senior Regulatory Specialist  
Insecticide-Rodenticide Branch  
Registration Division (7505C)  
E-mail: [kumar.rita@epa.gov](mailto:kumar.rita@epa.gov)

Enclosure

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# Rodspray Fly, Cockroach & Ant Killer

Kills Ants, Roaches, Flies & Fleas Fast

Orange Fragrance

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" 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

{Woman Spraying 'Cartoon Bugs' Graphic}

**Active Ingredient:**

d-limonene .....	4.015%
<b>Other Ingredients</b> .....	<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)

ACCEPTED  
with COMENTS  
in EPA Letter Dated:

DEC 22 2006  
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, Flies & Fleas Indoors & Outdoors

Use around food, children, pets & fish

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

Orange Fragrance

### DIRECTIONS FOR USE

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

Use caution when walking on hard floors until any applied spray has dried.

[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 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:** To keep pesky insects away, lightly spray tables and outdoor furniture, BBQs, grills, paths and grass a few minutes or so before your party starts and food is served. Do not spray open flames or hot coals [and reapply as needed]. 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  
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{Recycle Logo}  
Recyclable

{EnviroMan Logo}  
For a healthier earth

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