

45987-2

8/24/2009

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 24 2009

Kim Davis, Reg West Company, LLC
Consultant/Agent for:
Rod Products Co., Inc.
30856 Rocky Road
Greeley, CO 80631-9375

Dear Ms. Davis:

Subject: Label amendment to add mandatory petroleum distillate first aid section
Rodspray Fly, Cockroach, and Ant Killer
EPA Registration No. 45987-2
Rodspray Indoor-Outdoor Crawling Insect Killer
EPA Registration No. 45987-9
Submissions Dated: June 9, 2009

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

- On page 1, both directly above the logo and above the "Directions for Use" section, delete **both** phrases that say: "Use Around Food, Children, Pets and Fish" as these statements are inappropriate on labels unless the product is registered for direct application to these sites.
- On page 2, delete the logo that reads: "EnviroMan For a Healthier Earth," as phrases and logos that imply improved health, safety, etc are considered false and misleading and are unacceptable on pesticide labels.

Submit one copy of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records. If you have any questions regarding this label, please contact Autumn Metzger at (703) 305-5314 or metzger.autumn@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Hebert".

John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

2 of 3

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"

& Mosquitoes Ticks Spiders

{Graphic}
Wasps

{Graphic}
Hornets &
Yellow Jackets

{Graphic}
Flour Beetles in
Food Closets

Use Around Food, Children, Pets and Fish



**ACCEPTED
With COMMENTS
In EPA Letter Dated:**

AUG 24 2009

**Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:**

45987-2

Active Ingredient:

d-limonene 4.015%

Other Ingredients* 95.985%

Total 100.000%

Contains a botanically-derived insecticide

*Contains petroleum distillates

Keep Out of Reach of Children

CAUTION

See back panel for First Aid statements. Read Directions on back panel 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

Orange Fragrance

DIRECTIONS FOR USE

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

Restrictions: Do not spray plants, animals or food. 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.

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:** Non-refillable container; do not reuse or refill this container. Clean container promptly after emptying, then offer for recycling if available; otherwise place in trash. **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.

First Aid

If Swallowed: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so 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.

Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

Made in USA [for]

Rod Products Co., Inc.

Boynton Beach, FL 33437

[Comments or Suggestions:] (561) 742-0080

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



[] Denotes alternate/optional language

{ } Denotes language that does not appear on the market label