

45987-9

8-29-2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

AUG 29 2007

Ms. Kim Davis  
CC, APC, Manager  
Consultant/Agent  
c/o RegWest Company, LLC  
30856 Rocky Road  
Greeley, CO 80631-9375

RE: Minor Label Changes  
EPA Reg. No.: 45987-9  
Date of Submission: July 13, 2007

Dear Ms. Davis:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 13, 2007, for the product Rodspray Indoor-Outdoor Crawling Insect Killer. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

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United States <b>Environmental Protection Agency</b> 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number  <b>Notification</b>
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**Application for Pesticide – Section I**

1. Company/Product Number <b>EPA Reg. No. 45987-9</b>	2. EPA Product Manager PM # <b>1</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) <b>Rodspray Indoor-Outdoor Crawling Insect Killer</b>		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to:  EPA Reg. No. _____  Product Name _____
5. Name and Address of Applicant (Include ZIP Code) <b>Rod Products Co., Inc.</b> <b>c/o RegWest Company, LLC</b> <b>30856 Rocky Road</b> <b>Greeley, CO 80631-9375</b> <input type="checkbox"/> Check if this is a new address		

**Section – II**

<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <b>02/12/2007</b> <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.
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**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

**Submit notification of label revision (additions) per PR Notice 98-10 and final printed labeling. Refer to the Reference Label for an illustration of the additions.**

*This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.*

**Section – III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify): _____	
*Certification must be submitted		If "Yes" Unit Packaging Wgt.    No. Per Container	If "Yes" Packaging Wgt.    No. Per Container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input type="checkbox"/> Paper glued <input type="checkbox"/> Other _____					

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).		
Name  <b>Kim Davis, CC, APC, Manager</b>	Title  <b>Consultant/Agent</b>	Telephone No. (Include Area Code) <b>(970) 353-0611</b> <b>kim@regwest.com</b>
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <b>(Stamped)</b>
2. Signature 	3. Title  <b>Consultant/Agent</b>	
4. Typed Name  <b>Kim Davis, CC, APC, Manager</b>	5. Date  <b>July 13, 2007</b>	

July 13, 2007



Ms. Sherada Hobgood  
Document Processing Desk – **NOTIF**  
Office of Pesticide Programs – **7504P**  
**U.S. Environmental Protection Agency**  
2777 South Crystal Drive  
One Potomac Yard, Room S-4900  
Arlington, VA 22202

Dear Ms. Hobgood:

**Subject:** Rod Products Company, Inc.  
Rodspray Indoor-Outdoor Crawling Insect Killer  
EPA Reg. No. 45987-9

On behalf of **Rod Products Co., Inc.** RegWest Company, LLC is submitting the attached documents as notification of label revision for subject product. RegWest will act as sole agent in this endeavor.

Attached are the following documents:

1. Application for Pesticide: Other (Notification)
2. One **Reference Label** (illustrating the additions)
3. Two **New Labels** (incorporating the additions)
4. Two final printed labels (distributor labeling)

We are adding a conversion to the 15 oz. treating 200 sq. ft (12 oz. treats 160 sq. ft.) and adding verbiage to allow for future conversions. In addition, we are adding and alternate "Comments or Suggestions" option. Both these changes are being done to support our supplemental distributor's label.

The labels submitted herewith satisfy the condition of the February 12, 2007 registration notice to submit two copies of final printed labeling. We must use our distributor's labeling as we are not currently marketing it ourselves.

Please contact me at 970-353-0611 or kim@regwest.com if you have any questions or require additional information.

Regards,  
**RegWest Company, LLC**



Kim Davis, CC, APC, Manager  
Consultant/Agent

Attachments

pc: RPC – Rod, R.  
Sergeant's – Kane, S.

30856 Rocky Road  
Greeley, CO 80631-9375  
970-353-0611  
970-353-0613 Fax  
Kim@regwest.com

AUG 29 2007

# Rodspray Indoor-Outdoor Crawling Insect Killer

Kills Ants, Fleas & Spiders  
Orange Fragrance  
Made with Pure Orange Peel Extract

**Kills:**

Ants (excluding carpenter ants, but including Pharaoh Ants, Harvester Ants and Fire Ants), Fleas in Carpets, Spiders (except black widow and brown recluse) and Flour Beetles in Food Closets

**Kills:**

{Graphic}  
Ants & Fire Ants

{Graphic}  
Fleas

{Graphic}  
Spiders

{Graphic}  
Flour Beetles

[New!]

Use Around Food, Children, Pets and Fish  
[{Woman Spraying 'Cartoon Bugs' Graphic}]

**Active Ingredient:**

d-Limonene .....	4.015%
<b>Other Ingredients</b> .....	<b>95.985%</b>
Total .....	100.000%

Contains a botanically-derived insecticide  
Contains mineral spirits

**Keep Out of Reach of Children**

### CAUTION

See back panel for additional precautionary statements.

Net Contents: \_\_\_\_\_ oz. (\_\_\_\_ grams)

{Back Panel}

## Rodspray Indoor-Outdoor Crawling Insect Killer

Kills ants, fleas and spiders indoors and outdoors.

Use around food, children, pets and fish

Kill insects in kitchens, schools, hospitals, apartments, restaurants and 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.

**Two-Way Spray:** Press button *very lightly* to get a narrow stream for insects hiding in cracks and crevices. Press *firmly* for a fine mist to spray surfaces where the listed insect pests crawl. Pests must be directly sprayed in order to be killed.

#### Indoors

**To Kill Listed Crawling Pests:** In a well-ventilated room, with nozzle pointing away from your face, directly spray pests that you see. May be used in structures such as homes, restaurants, hospitals, schools and food processing

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establishments. Specific sites where these pests may be found include kitchen cabinets, drawers and closets, under sinks and in wall and floor cracks and crevices. May be used in both edible and non-edible product areas of Federally-approved meat, poultry and egg producing establishments.

**To Kill Fleas:** Before spraying, test a corner of fabric for compatibility. Hold container tilted down away from your face and with a sweeping side-to-side motion spray carpets, rugs, dog and cat bedding and under furniture. Fleas contacted with the spray will be killed. One 15 oz. container treats 200 sq. ft. [One 12 oz. container treats 160 sq.ft. {or other appropriate conversion based on container size}]

### Outdoors

**To Kill Listed Crawling Pests Outdoors, Including Barbeque and Picnic Areas:** Hold container upright. Spray away from your face sufficiently to wet ants and spiders that you see. Specific areas where you see these pests include outside buildings, windows, doors and sidewalks. Do not spray plants or animals.

### Storage and Disposal

**Storage:** Store container in a cool, dry place. **Disposal:** Do not puncture or incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

### PRECAUTIONARY STATEMENT

#### Physical or Chemical Hazards

Contents under pressure. Do not use near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

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 33474

[Comments or Suggestions:] (561) 742-0080 [Comments or Suggestions, please write: {address}]  
[www.bugsrdone.com]

**EPA Reg. No. 45987-9**  
**EPA Est. 44673-CA-1** {or appropriate facility number(s)}

U.S. Patents 5,653,991 & 5,814,325  
© 2007 EnviroMan, Inc.

{Recycle Logo}  
Recyclable

{Logo}

Contains no CFCs which deplete the earth's protective ozone layer.

{Enviroman Logo}  
For a healthier earth

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

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**STORAGE AND DISPOSAL**

**STORAGE:** Store container in a cool, dry place.  
**DISPOSAL:** Do Not Puncture or Incinerate! If empty, Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions.

**PRECAUTIONARY STATEMENT**

**PHYSICAL OR CHEMICAL HAZARDS**  
Contents under pressure. Do not use near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

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.

Comments or Suggestions, please write:  
Sentry Consumer Response  
P.O. Box 540399, Omaha, NE 68154-0399  
www.sergeants.com

Made in USA for  
Sergeant's Pet Care Products, Inc.  
Omaha, NE 68130

EPA Reg. No. 45987-9-2517; EPA Est. 11623-GA-1

U.S. Patents 5,653,991 & 5,814,325



Recyclable

Contains no CFCs which depletes the earth's protective ozone layer.

AMAN P001429-1

**SENTRY.**

# Natural Defense™

Household Spray



**Kills**

- Fleas
- Ants (excluding carpenter ants, but including pharaoh ants, harvester ants and fire ants)
- Spiders (except black widow and brown recluse)
- Flour Beetles

Made with Pure Orange Peel Extract  
Use Around Children, Pets, Fish and Food

ACTIVE INGREDIENT:	
d-Limonene	4.015%
OTHER INGREDIENTS	95.985%
TOTAL	100.000%
Contains a botanically-derived insecticide	
Contains mineral spirits	

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

See Back Panel for Additional Precautionary Statements

NET WT 1.2 OZ (340 g)

**Sentry®**  
**Natural Defense™**  
**Household Spray**

Kills ants, fleas and spiders indoors and outdoors. Use around children, pets, fish and food. Kills insects in kitchens, schools, hospitals, apartments, restaurants, and 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.

**TWO-WAY SPRAY:** Press button very lightly to get a narrow stream for insects hiding in cracks and crevices. Press firmly for a fine mist to spray surfaces where the listed insect pests crawl. Pests must be directly sprayed in order to be killed.

**INDOORS:**

**To Kill Listed Crawling Pests:** In a well-ventilated room, with nozzle pointing away from your face, directly spray pests that you see. May be used in structures such as homes, restaurants, hospitals, schools and food processing establishments. Specific sites where these pests may be found include kitchen cabinets, drawers and closets, under sinks and in wall and floor cracks and crevices. May be used in both edible and nonedible product areas of Federally-approved meat, poultry and egg producing establishments.

**To Kill Fleas:** Before spraying, test a corner of fabric for compatibility. Hold container tilted down away from your face and with a sweeping side-to-side motion spray carpets, rugs, dog and cat bedding and under furniture. Fleas contacted with the spray will be killed. One 1.2 oz. container treats 160 sq. ft.

**OUTDOORS:**

**To Kill Listed Crawling Pests Outdoors, Including Barbeque and Picnic Areas:** Hold container upright. Spray away from your face sufficiently to wet ants and spiders that you see. Specific areas where you see these pests include outside buildings, windows, doors and sidewalks. Do not spray plants or animals.

