

45987-9

8/24/2009

1 of 3



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,

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

20f3

Rodsspray 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

{Graphic} Ants & Fire Ants {Graphic} Fleas {Graphic} Spiders* {Graphic} Flour Beetles*

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

Active Ingredient:	
d-Limonene	4.015%
Other Ingredients*	<u>95.985%</u>
Total	100.000%
Contains a botanically-derived insecticide	
*Contains petroleum distillates	

**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:**

Keep Out of Reach of Children
CAUTION

See back panel for First Aid and additional precautionary statements. 45987-9

Net Contents: _____ oz. (____ grams)

{Back Panel}

Rodsspray 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.

Restriction: Do not spray plants, animals or food.

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 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.

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.

*Except in California

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.

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}]

EPA Reg. No. 45987-9

EPA Est. 44673-CA-1 (or appropriate facility number(s))

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

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**PLEASE RECYCLE
WHEN EMPTY**



Recyclable



[] Denotes alternate/optional language

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