

SEP 21 1992

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Perycut-Chemie AG
% Mrs. Olivia Laird
Laird's Regulatory Consultants
501 S Lincoln Ave.
Sterling Park, VA 22170

Dear Mrs. Laird:

Subject: Amendment - Revised Use Directions
Insectkiller Cockroach Carpet
EPA Registration No. 50654-4
Your Letter Dated September 8, 1992

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Reinstate the complete paragraph indicated in comment 1(b) of our August 11, 1992 letter.
2. Reinstate the paragraph indicated in comment 1(c) of our August 11, 1992 letter. The user must be aware of the types of non-food areas.
3. Delete the sentences beginning, "Units may also be placed" and "In the morning the units...". As indicated in comment 3 of our August 11, 1992 letter, these statements contradict the statement placing the carpet in out of the way places where children and pets will have no contact.
4. The common names for the active ingredients, Permethrin and d-trans Allethrin, should appear in front of the chemical names in the ingredient statement.
5. Delete the claim, **No Offensive Odour**, from the labeling. Words or phrases implying that a product possess unique characteristics because of its composition or comparing it to other products (direct or implied claims) are not acceptable. What is an "offensive" odor?

GA 9/24/92

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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- 6. The EPA Establishment Number must appear on the labeling or on the container.
- 7. The claim, "Effective for Many Weeks" must be qualified with a specific amount of time, such as four months if this is what the data demonstrated.

Submit five copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
 Product Manager 13
 Insecticide-Rodenticide Branch
 Registration Division (H7505C)

Enclosure

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 21 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No. 50654-4 PERYCUT QUALITY

Front

DRAFT

- INSECT
COCKROACH

- INSECTKILLER -
COCKROACH CARPET

Impregnated Carpet Insecticide

The Portable, Self-contained Insect Fighter for Homes
and Business Establishments.

Kills on Contact
Effective for many Weeks
No offensive Odour

Active Ingredients: (3-phenoxyphenyl) methyl (1) cis-trans-3-(2,2-
dichloroethenyl) 2,2-dimethylcyclopropanecar-
boxylate.....0.250 %

ed-trans-chrysanthemum monocarboxylic ester of
di-2-allyl-4-hydroxy-3-methyl-2-cyclopenten-1-
one.....0.055 %

Inert Ingredients..... 99.695 %
Total 100.000 %

* minimum 35% (1) cis; maximum 65% (1) trans

Manufactured for:

PERYCUT-CHEMIE AG
Wehrenbachhalde 54
CH-8053 Zurich
Switzerland

EPA Reg. No. 50654-4
EPA Est. No. ?

KEEP OUT OF REACH OF CHILDREN

CAUTION

(See Directions and Cautions on Back)

Additional Pre-

Domestic Model: 60 x 15 cm (23 7/8" x 5 7/8") SWISS MADE



For use in the home and in non-
establishments (including but

- | | |
|------------------|--------------|
| Bakeries | Food Process |
| Canneries | Meat Pack |
| Flour Mills | Beverage |
| Supermarkets | Schools |
| Home Kitchens | Hotels |
| Kennels | Restaurants |
| Office Buildings | Hotels |
| Machine Rooms | Garbage |
| Garages | Boiler Rooms |
| Locker Rooms | Vestibules |
| Storage Areas | Industrial |

Do not use in food/feed areas of
restaurants or other areas where
or processed. Not for use in USDA

DIRECTIONS

It is a violation of Federal Law
inconsistent with its labelling.
CARPET, remove from wrapper, grasp
the unit in the area to be treated
touching the treated carpet surface
children and pets (i.e. under
machines, on shelves, behind furni-
up to four (4) months. Units may
night when the cockroaches are
are removed from the area. In the
folded up and safely stored away.
nately 45 square feet of area to



PRECAUTIONARY

Hazards to Humans and

CAUTION Avoid contact with skin,
if absorbed through skin
and foodstuffs.

STATEMENT OF PRACTICAL TREATMENT
In case of contact, remove
affected area with soap

STORAGE Store in cool, dry place

DISPOSAL Wrap unit in several layers
collection.

BEST A

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TO
OXIPHEN TECHNOLOGIES
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