

SEP 13 1994

Mr. John R. Fitt  
DowElanco  
9330 Zionsville Road  
Indianapolis, Indiana 46268-1054

Subject: Revised Labeling--Alternate Formulations  
Dursban WB05 III  
EPA Registration Number 62719-197  
Your Application Dated August 2, 1994

Dear Mr. Fitt:

The labeling 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 before you release the product for shipment bearing the amended labeling:

1. Delete "More active on fleas than sevin, diazinon, malathion, permethrin, pyrethrins, resmethrin" as a claim.
2. Delete "New faster acting formula" and "Faster acting formula" as claims. No data have been submitted to support the claim "faster".

(Note that the claims referring to a "new" formula are acceptable, but can be used only for the first six months that the product is marketed with labeling containing these claims.)

3. Delete the claim "Keeps on killing roaches for up to 8 weeks." We have submitted the study for efficacy review, and upon completion of the review it may be possible to use the claim. Has this study (Report No:93JJBU052/Project No:93-603) previously been submitted to the Agency? If so, please identify it by MRID Number.
4. The claims "For use in and around the home" and "Replaces home pest insect control" are acceptable. The sentence "For indoor and outdoor home use only" in the precautionary statements (page 5 of the draft label) is also acceptable. It is assumed that if the product is marketed

for homeowner use, labeling will contain these limitations. In this case, however, the section in the directions for use, "Application within Food Handling Establishments..." (page 7 of the draft label), cannot appear on the label.

5. In the ingredients statement correct the spelling of N-Octyl-Bicycloheptene Dicarboximide, and replace the concentration of Piperonyl Butoxide, Technical in the column with the other concentrations.

6. In the directions for the control of fleas and brown dog ticks, revise the sentence "Treat pets with a product labeled for this use" to "Treat pets with a product registered for this use." The sub-registrant may not specify an actual product, but may suggest one ("...registered for this use, such as...").

7. On page 8 of the draft label delete the section, "SUGGESTION: To improve control..."

8. Labeling for larger containers sold only to refill the smaller, spray containers must include text that specifies this limitation, for example:

To be used only to refill spray containers of ORTHO Home Pest Insect Control.

Labeling for the smaller, spray containers must include text such as:

To be refilled only with ORTHO Home Pest Insect Control.

The alternate formulation indicated on the Confidential Statement of Formula, dated August 1, 1994, is acceptable and has been added to our files for the product.

Submit five (5) 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,

DHE

Dennis H. Edwards, Jr.  
Product Manager (19)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

Retain in jacket

# Dursban\* WB05 III

EPA Reg. No. 62719-197

## Proposed Label Amendment

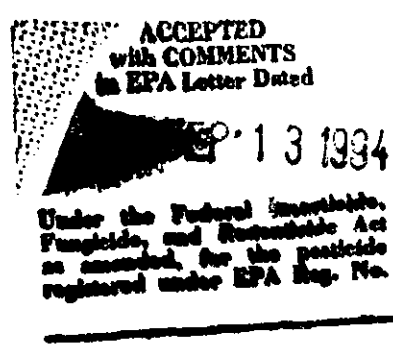
Current label text based on EPA-accepted copy dated 04/03/92.

### Revisions:

1. Replace "Controls Pests in and Around Households" with several additional marketing claims.
2. Revise label format for easier consumer use. Revisions include:
  - (a) Directions for use moved to the top of the back panel of the label.
  - (b) Revised environmental hazard section to be consistent with consumer use pattern.
  - (b) Revised storage directions to reflect special considerations for trigger sprayers.
  - (c) Items in "General Use Precaution" section moved to more appropriate section of the label.
  - (d) Reformat sections for "Application to Pests Indoors" and "Application to Pests Out -of-Doors" for ease of understanding.
3. Add suggestions to improve pest control.
4. Add refilling directions.
5. Add directions for use of trigger spray.

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[Editor's note: Added text indicated by underline and deleted text denoted by ~~strike-through~~.]



Insecticide

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[F]itor's note: Added text indicated by underline and deleted text denoted by ~~strike-through~~.]

(Product Label)

# Dursban\* WB05 III

~~Controls Pests In and Around Households~~

~~Contains Dursban Insecticide~~

and/or

~~Do-it-Yourself pest control~~

and/or

~~Kills on contact~~

and/or

~~Kills fleas in carpets~~

and/or

~~More active on fleas than sevin, diazinon, malathion, permethrin, pyrethrins, resmethrin~~

and/or

Also kills: roaches, ants, fleas, carpet beetles, spiders, brown dog ticks, scorpions, black widow spiders, flies, mosquitoes, earwigs, silverfish, and other listed pests

and/or

New fast acting formula - stops/knockdowns/kills insects/bugs in minutes

and/or

~~New faster acting formula~~

and/or

~~Faster acting formula~~

and/or

New formula

and/or

Stops bugs fast

and/or

~~Keeps on killing roaches for up to 8 weeks~~

*submit to efficacy*

and/or

Fast, effective flea control

and/or

For outdoor use

and/or

For use in and around the home

and/or

Replaces home pest insect control

and/or

Ready to use

and/or

Country fresh scent

and/or

Non-staining

and/or

Does not stain

and/or

No mixing

and/or

For use on floor covering and other indoor areas

Insecticide

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Active ingredient(s):

Chlorpyrifos: O,O-Diethyl-O-(3,5,6-trichloro-2-pyridinyl)	
phosphorothioate .....	0.50%
D-Trans Allethrin (Ally) Homolog of Cinerin ID) .....	0.05%
N-Cetyl Bicycloheptene Dicarboximide .....	0.16%
* <del>1</del> Piperonyl Butoxide, Technical .....	0.10%
<del>0.10%</del>	
Inert Ingredients .....	99.19%
Total: .....	100.00%

octyl

\* ~~1~~ Piperonyl Butoxide Technical 0.10% consists of 0.08% (butylcarbityl) (6-propylpiperonyl) ether & 0.02% related compounds

EPA Reg. No. 62719-197

EPA Est. \_\_\_\_\_

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DowElanco • Indianapolis, IN 46268-4489 1053 U. S. A.

Net Contents \_\_\_\_\_

Precautionary Statements

~~— Hazards to Humans and Domestic Animals~~

~~Keep Out of Reach of Children~~

**CAUTION**

~~Avoid contact with eyes, skin and clothing. Avoid breathing vapors or spray mist. Keep away from food, feedstuffs, and domestic water supplies. Wash thoroughly after handling.~~

~~— First Aid~~

~~If swallowed: Call a physician or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching the back of the throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.~~

~~If on skin: In case of contact, remove contaminated clothing and immediately wash skin with plenty of soap and water.~~

~~If in eyes: Flush eyes with plenty of water.~~

~~Note to Physician: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine only by injection is an antidote.~~

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**Environmental Hazards**

This product is toxic to fish, birds and other wildlife. Do not apply directly to lakes, streams and ponds. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label. This product is highly toxic to bees exposed to direct treatment or residues on plants. Protective information may be obtained from your Cooperative Agricultural Extension Service.

**Physical or Chemical Hazards**

Do not use or store near heat or open flame.

**Directions For Use**

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

**Precaucion al Usuario:** Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada amablemente.

**Translation (To the user):** If you cannot read English, do not use this product until the label has been fully explained to you.)

**STORAGE DISPOSAL**

**Storage:** Store in original container in a cool dry place inaccessible to children or pets. Protect from freezing.

**Container Disposal:** Do not reuse empty container. Wrap container in several layers of newspaper and discard in trash.

**General Information**

Use Dursban<sup>®</sup> WB05 III insecticide to control the pests indicated in the areas listed below by application of the product as undiluted spray. Repeat the treatment as needed.

**General Use Precautions**

Do not apply sprays of this product in conduits, motor housing, junction and switch boxes or other electrical equipment because of possible shock hazard. Do not allow spray to contact food, feedstuffs and water supplies. Thoroughly wash dishes and food handling utensils with soap and water if they become contaminated by application of this product. Do not allow children or pets to contact treated surfaces until spray has dried. Remove pets and cover fish bowls (tanks) before spraying. Do not treat pets with this product.

**Application to Pests Indoors**

*(Food handling use moved to page 7 of label)*

**Application within Residential Buildings, including homes and apartment buildings and within non-food areas of industrial, institutional, and commercial buildings including hospitals, stores, manufacturing plants and warehouses:** For spot treatment only. Apply as a coarse spray to localized areas where cockroaches (including strains resistant to other insecticides), ants, clover mites, crickets, firebrats, silverfish and spiders are found or normally occur including dark corners of rooms and closets; cracks and crevices in walls; along and behind baseboards; beneath and behind sinks, stoves, refrigerators and cabinets; around plumbing and other utility installations. For ants, apply to ant trails, also around doors and windows, and wherever else these pests may find entrance.

**For Control of Carpet Beetles:** Thoroughly apply as a spray for spot treatment along baseboards and edges of carpeting, under carpeting, rugs and furniture, in closets and on shelving, and wherever else these insects are seen or suspected.

**For Control of Fleas and Brown Dog Ticks:** Thoroughly apply as a spray for spot

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~~treatment to infested areas, nearby cracks and crevices and along and behind baseboards, window and door frames and localized areas of floor and floor covering where these pests may be present. For best results, old bedding should be cleaned or replaced. Do not treat pets or their bedding with this product. To control the source of the flea infestation, pets inhabiting the treated premises should be treated with a product registered for application to animals.~~

### ~~— Application to Pests Out-Of-Doors~~

~~**Flies, Mosquitoes:** For outdoor use only as an aid in reducing annoyance from these insects. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages and other places where these insects alight or congregate. Repeat as necessary.~~

~~**Ants, Brown Dog Ticks, Crickets, Fleas, Earwigs:** For treatment of localized infestations of these insects in outdoor areas where there are weeds or brushy non-crop areas, spray infested areas thoroughly. For ants, thoroughly wet hills and runways. Repeat applications as infestations warrant and as reinfestation occurs.~~

Keep out of reach of children

#### CAUTION

(See back panel for additional precautionary statements)

#### Net Contents

24 fl oz. (1 pt, 8 fl oz.) 709 ml

64 fl oz. (1/2 gal) 1.89 L

1 gal/3.78 L

2 gal/7.57 L

A fast acting, freshly scented product for effective and long lasting control of fleas, roaches, ants, spiders and other listed pests. For indoor and outdoor home use only. Does not stain and can be applied to carpets, rugs, floors and baseboards.

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**DIRECTIONS FOR USE**

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

**READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.**

How To Use: Shake before using. Adjust spray nozzle to give a fine spray or a stream for crack and crevice treatment.

Hold sprayer 12 inches from the surface or insects to be treated. Spray until slightly wet. Repeat as needed.

Wash dishes and food handling utensils with soap and water if contacted by spray. Keep children or pets out of treated areas until the spray has dried. Remove pets and cover fish tanks before spraying. Do not apply on plants.

Trigger Sprayer Directions for Use: (Editor's note: If this product is packaged and sold with a trigger sprayer, the subregistrant could attach "Trigger Sprayer Directions for Use" to pouch containing the trigger sprayer or to tag attached to trigger sprayer.)

Sprayer Preparations and Priming

1. Open adjustment nozzle 2 complete revolutions. Submerge sprayer and hose in water. Operate trigger 10 to 15 times to prime sprayer.

2. Remove sprayer from water; then pump handle. You should have a stream of spray while pumping. If not, see direction #7.

Cap-Tube Installation on Bottle

3. Remove cap from bottle and push capliner out of cap with end of hose.

4. Feed hose through hole in cap so that cap is level with top of container when hose tip touches bottom of container.

5. Put hose into container, screw cap on tight. Hose should reach bottom of container.

6. Pump handle to clear water from hose. Adjust nozzle to spray desired spray pattern.

For Non-Functional Sprayer

7. Remove nozzle cover. Check holes for obstructions in nozzle and plastic component. With nozzle cover removed, submerge sprayer and hose in warm water. Operate trigger 10 - 15 times until spray begins. Replace nozzle cover, pump to clear water from hose end and begin spray treatment.

Storage

8. Store container out of reach of children. Place sprayer nozzle under handle on container so that sprayer is not below level of contents of container.

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**WHERE TO USE**

**INDOORS**

**ANTS**  
Apply directly to ants, trails and wherever these pests may find entrance.

**ROACHES, CLOVER MITES, CRICKETS, FIREBRATS, SILVERFISH, SPIDERS**  
Including Black Widow Spiders, SCORPIONS, and STORED PRODUCTS  
**INSECTS including CONFUSED FLOUR BEETLES, SAW-TOOTHED GRAIN**  
**BEETLES, INDIANA MEAL MOTHS, RICE WEEVILS, MEDITERRANEAN FLOUR**  
**MOTHS AND RED FLOUR BEETLES.**  
Thoroughly apply under and behind sinks, stoves, refrigerators, cabinets, around plumbing,  
along baseboards and other areas where insects hide.

**CARPET BEETLES**  
Spot treat along baseboards and edges of carpeting or wherever these insects are seen.

**FLEAS, BROWN DOG TICKS**  
Remove pet bedding and clean thoroughly or destroy. Do not treat pet bedding with this product.  
Spot treat pet's sleeping quarters, along baseboards, windows, door frames, cracks, crevices,  
carpets, rugs and floors where these pests hide. Put fresh bedding in pet quarters after spray has  
dried.

**DO NOT SPRAY ANIMALS.** Treat pets with a product labeled for this use (Sub-registrant to  
provide actual product name).

**INDOOR USE CONTINUED** OMIT FOR HOMEOWNER USE LABELS

**Application within Food Handling Establishments (places other than private residences in which food is held, processed, prepared or served), including, but not limited to Restaurants, Grocery Stores, Bakeries, Bottling Plants, Canneries and Grain Mills:**

Use as a spot treatment in and around both food and non-food areas to control cockroaches, (including strains resistant to certain other insecticides), ants, crickets, firebrats, silverfish, spiders, and stored product insects such as confused flour beetles, saw-toothed grain beetles, Indian meal moths, rice weevils, Mediterranean flour moths and red flour beetle. Apply as a coarse spray to localized areas. Do not introduce the spray into the air or allow the spray to contact food or food-contacting surfaces. Areas treated may include dark corners of rooms and closets; along and behind baseboards; beneath and behind stoves, refrigeration units and similar food preparation areas and equipment; floor drains; and around plumbing and other utility installations. For ants, apply to ant trails and wherever these pests may find entrance. Spot treatment may encompass crack and crevice treatment by applying small amounts of material directly into openings leading to voids and hollow spaces in walls, equipment legs and bases, or which occur at points between different elements of construction or between equipment and floors. Repeat treatment as needed, but not more than once every 7 days in restaurants and similar food service establishments; or more often than once every 14 days in other types of food handling establishments. Application of this product in food handling establishments other than as a spot and/or crack and crevice treatment is not permitted.

**OUTDOORS**

**ANTS**

Thoroughly wet hills and runways.

**FLIES AND MOSQUITOES**

To reduce annoyance of these insects, spray screens, doors, window frames, around light fixtures on porches, in garages, and other places where insects rest.

**FLEAS, BROWN DOG TICKS, CRICKETS AND EARWIGS**

Treat areas around garbage cans, house foundations, or other locations where insects are found.

**SUGGESTION:** To improve control of fleas, roaches, spiders, silverfish, ants and crickets, use an indoor fogger (Sub-registrant to provide actual product name) after treating with this product. This treatment will flush insects out of hiding and across the treated surface.

For 1 pt. 8 fl. Oz. Size

To refill: Use the 1 gallon size of ORTHO® Home Pest Insect Control to fill this container. No dilution required.

**STORAGE:** Rotate nozzle to closed position. (For larger than 24 oz. Sizes: Place sprayer nozzle under handle on container so the sprayer is not below level of contents of container to prevent leakage and siphoning from nozzle.) Store in original container in a secure cool dry place. Protect from freezing.

**CONTAINER DISPOSAL:** Do not reuse container. Wrap empty container in several layers of newspaper and discard in trash.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Avoid contact with eyes, skin and clothing. Avoid breathing vapors or spray mist. Keep away from food, feedstuffs and domestic water supplies. Wash thoroughly after handling. **If swallowed:** Call a physician or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching the back of the throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

**If on skin:** Remove contaminated clothing and wash skin with plenty of soap and water.

**If in eyes:** Flush eyes with plenty of water.

**Note to Physician:** Emergency Information -- call (number to be supplied by sub-registrant). Chlorpyrifos is a cholinesterase inhibitor. Atropine is antidotal. 2-PAM is also antidotal and may be used in conjunction with atropine but should not be used alone.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not apply where runoff is likely to occur. This product is highly toxic to bees exposed to direct treatment or residues on plants. Protective information may be obtained from your cooperative Agricultural Extension Service.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not store near heat or open flame. Do not apply sprays of this product in conduits, motor housings, junction and switch boxes or other electrical equipment because of possible shock hazard.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Medical information call (number to be supplied by sub-registrant)

Product information call (number to be supplied by sub-registrant)

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Monsanto Company 1994

**WARRANTY INFORMATION**

(Subregistrant may include appropriate statements to address Warranty Disclaimer, Inherent Risks of Use or Limitation of Remedies pertaining to use of this product.)

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