

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

21 JUN 1994

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Eliot I. Harrison
Canine Care Incorporated
P.O. Box 11436
Costa Mesa, CA 92627

Dear Mr. Harrison,

Subject:

Amendment Application for Rate Reduction

Terminator

EPA Registration Number 66674-1

Terminator Plus

EPA Registration Number 66674-2 Submissions Dated August 23, 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One (1) copy of the respective finished labeling must be submitted prior to releasing the products for shipment. A stamped copy of each of the respective product labels is enclosed for your records.

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The Agency has made the determination that the application rate for these two products may be reduced to 26 mg/sq.in. without additional efficacy data. Delete the "1/4" designation from the application rate declaration. If it is your intent to decrease the application rate further, you must either generate the necessary data and submit this for review, or you may cite a "substantially similar or identical" pesticide product(s) bearing the rate of application equal to that which you intend to use, and submit the necessary Certification with Respect to Citation of Data form along with the Application for Pesticide Amendment.

- 1. Revise the proposed label to declare 26 mg/sq.in. or an equivalent. Based upon our calculations, the equivalent would be approximately 1 pound product per 100 square feet.
- 2. Make the following revisions in the text of the respective product labels for products 66764-1 and 66764-2:
 - a. Delete the term "copious" from the STATEMENT OF PRACTICAL TREATMENT, and substitute a more commonly recognized term such as "large amounts".
 - b. Move the "DIRECTIONS FOR USE It is a Violation of Federal Law to use this product in a manner inconsistent with its labeling" such that it appears directly above the paragraph which begins "Terminator may be used....".



c. The STORAGE AND DISPOSAL section must be revised accordingly to meet the Agency requirements for containers up to 30 pounds net weight. Refer to the attached sheet for appropriate statements.

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Sincerely,

Mr. Robert S. Brennis

Acting Product Manager 10 Insecticide-Rodenticide Branch

Registration Division

Terminator Plus may be used in homes, restaurants, and other food and food handling establishments, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, industrial plants, theaters, ships, boats, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities and sewers.

DOMESTIC (HOMEOWNER USE) FLEAS

Use Restrictions: Apply only when children and nets do not have access to treatment areas. Avoid contamination of feed and foodstuffs,

Application Directions for Flea Control: Apply directly on carpets where pets frequently traffic or sleep at the rate of 1/4-1 lb, per 100 square feet. Work privider deep into fibers and mat. Any powder visible after application must be brushed into carpet fibers or vacuumed. Allow powder to remain for a period of three weeks to achieve maximum. flea control in carpets. Reapply if necessary.

DOMESTIC (HOMEOWNER USE) COCKROACHES, ANTS AND SILVERFISH

Use Restrictions: Apoly only in areas inaccessible to children and pets. Avoid contamination of feed and foodstuffs.

Application Directions for Cockroaches, Ant and Silverfish Control: Apply liberally, scattering under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer, tubs; into openings around drains, water pipes and electrical conduits, and in cracks and crevices along baseboards and corners of cabinets, cupboards, and closets. Remove all lower drawers in latchen and bathroom cabinets, bedroom dressers and chests of drawers, then scatter liberally in drawer wells. Any powder visible after application must be brushed into cracks and creuces or removed. Reapply as necessary.





TERMINATOR PLUS

Effectively Controls Fleas on Carpets and Furniture and Cockroaches, Ants and Silverfish in Cracks and Crevices and on Hard Surfaces

ACTIVE INGREDIENT.

CAUTION

KEEP OUT OF REACH OF CHILDREN

STATEMENT OF PRACTICAL TREATMENT

If in Eyes: Flush with copious amounts of water. Get medical attention,

If on Skin: Rinse with water,

If Swallowed: Drink large amounts of water. Get medical attention,

If inhaled: Remove to fresh air.

See Side Panel for Additional Precautionary Statements

Will Not Damage Furniture

NET CONTENTS:

EPA Reg. No. 66674-2 EPA Est. No. 66674-CA-1

Manufactured by:

Canine Care Inc. P.O. Box 11436 Costa Mesa, CA 92627

PRECAUTIONAR

HAZARD TO H

CAUTION: Harmful if swallowed. W Avoid contamination of food and feed

DIRECTION

It is a violation of Federal Law to use inconsistent with its labeling.

STORAGE AN

Do not contaminate water, food or fe STORAGE: Store in a dry place. Do animals may gain access.

PESTICIDE DISPOSAL: Securely we layers of newspaper and dispard in tre CONTAINER DISPOSAL: Do not real

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NON-DOMESTIC USE (NONEDIBLE PRODUCT AREAS ONLY)

Use Restrictions: Apply only in areas inaccessible to children and pets. Do not use in edible product areas of food handling establishments, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed.

Directions for Applying in New and Existing Construction to Control Cockroaches: When treating large areas, such as wall voids, soffit and subcabinet voids in new and existing construction, dust liberally using dusting application equipment.

Directions for Applying in Sewers and Manhole Cavities. Apply this product at a rate not to exceed 12 oz iper 190 sq. ft. using portable blowers or air pressure tanks.

Directions for Applying as a Mop Solution to Control Cockroaches

Mixing and Application Directions: Add 1 cup of powder to each gailon of rinse water. Apply to floor areas only. Make only enough for each application. Supplemental treatment only

Reapply as necessary. Any powder visible after application must be brushed into cracks and crevices or removed. Avoid contamination of feed and toodstuffs.

FOOD HANDLING ESTABLISHMENTS

Places other than private residences in which food or feed is neld, processed, prepared, or served

1. FOOD AREAS (INCLUDING SOME SERVING AREAS)

Includes areas for receiving, storage, packing (canning, botting, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Also includes some SERVING AREAS.

FOOD SERVING AREAS

SERVING ARFAS are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered FOOD AREAS when food is exposed and the facility is in operation.

Follow application directions in this section. If food is not exposed and facility is not in operation, follow application directions under NONFOOD SERVING AREAS below.

Use Restrictions: FOOD AREA application is limited to CRACK AND CREVICE TREATMENT ONLY. Applications to other areas are not permitted.

Application Directions: Apply in small amounts directly into cracks and crevices using a bulbous duster or other suitable equipment capable of applying insecticides directly into cracks and crevices, in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases, conduits, motor housing and electrical switch boxes where cockroaches hide

Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

2. NONFOOD AREAS (INCLUDING SOME SERVING AREAS)

Includes garbage rooms, lavatories, floor drains (to sewer), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Also includes some SERVING AREAS.

SERVING AREAS are facilities where food is served, such as diring rooms, but not where food is prepared or held. These areas are considered NONFOOD AREAS when food is not exposed and the facility is not in operation.

Follow application directions in this section. If food is exposed and the facility is in operation, follow application directions under FOOD SERVING AREAS.

Application Directions: Apply as a spot treatment to selective surfaces such as baseboards, under elements of constructions into cracks and crevices. Avoid treating surfaces likely to be contacted by food.

OTHER NONFOOD AREAS

Application Directions: Apply to baseboards areas, around water pipes, surfaces behind and beneath sinks, lockers, tables, pallets and similar areas where insects hide or through which they may enter.





