Jul 28 1999

Ms. Jamie Zajac Sherwin- Williams Diversified Brands, Inc. 26300 Fargo Avenue Bedford Heights, Ohio 44146-1370

Dear Ms. Zajac:

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Label Amendment- add additional institutional Subject: Industrial Claims TSD House & Garden/Flea and Tick Spray EPA Registration Number 67603-2 Your submission dated July 13, 1999

The product referred to above will be acceptable registration under FIFRA sec. 3(c)(7)(A) provided that you:

- Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
 - 2. Make the labeling changes listed below:
 - a. On the front panel change "FOR USE ON DOGS AND ON PREMISES TO CONTROL FLEAS AND TICKS" to "FOR USE ON PREMISES TO CONTROL FLEAS AND TICKS".
 - b. Delete the section "To Kill Fleas, Ticks and Lice On Dogs:".
 - c. Under INDUSTRIAL & INSTITUTIONAL LABEL VERBIAGE: delete "PROTECTS FOR UP TO {4 WEEKS}, {12 WEEKS}, {3 MONTHS } .

On March 31, 1999 the product you cited (EPA Registration Number 4816-774) deleted dog use from their label.

3. Submit two (2) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

We note the additional brand name Bonide Eight Insect Control Vegetable, Fruit & Flower Spray Concentrate.

Sincerely yours,

George T. LaRocca Product Manager (13) Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure

MASTER LABEL

TSD HOUSE & GARDEN/ FLEA & TICK SPRAY

ACTIVE INGREDIENTS:

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Pyrethrins	0.10%
*Piperonyl Butoxide, Technical	0.50%
**Permethrin	
INERT INGREDIENTS	99.20%
	100.00%

*Equivalent to min. 0.4% (butylcarbityl)(6-propylpiperonyl) ether and 0.19% related compounds.

**(3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min 35% (+/-) cis and max. 65% (+/-) trans.

Pyrenone and Permanone - Registered Trademarks of AgrEvo Environmental Health, Inc.

Pyraperm - Trademark of AgrEvo Environmental Health, Inc.

EPA REG. NO.: 67603-2

EPA EST. NO.: 10900-OH-1

33915-MI-1 257-MD-1

KEEP OUT OF REACH OF CHILDREN
CAUTION
See Rear Panel For Use Cautions

NT. WT.

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUL 28 **1999**

Under the Federal Inspeciable, Fundaide, and Bodentielle dei 16 amended, for the possibility registered under EFS R. 19

67603-2

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if inhaled. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash before reuse. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before spraying. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS: Flammable. Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130 degree F may cause bursting. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

STATEMENT OF PRACTICAL TREATMENT: IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

HOUSEHOLD LABEL VERBAGE:

- KILLS ON CONTACT
- CONTAINS PYRENONE AND PERMANONE
- CONTROLS RESIDENTIAL AND GARDEN INSECTS
- SEEKS OUT BUGS WHERE THEY HIDE
- FOR HOUSEHOLD/RESIDENTIAL USE ONLY
- NON-STAINING
- A BROAD SPECTRUM INSECTICIDE HIGHLY EFFECTIVE AGAINST ANTS (INCLUDING CARPET, FLOUR, GRAIN, AND GROUND BEETLES), CENTIPEDES, CLOVER MITES, COCKROACHES, CRICKETS (INCLUDING MOLE CRICKETS), EARWIGS, FIREBRATS, FLEAS, MILLIPEDES, MOTHS, PILLBUGS, SCORPIONS, SILVERFISH, SOWBUGS, SPIDERS, TICKS, WASPS, AND OTHER PESTS LISTED ON THE LABEL.
- KILLS LICE AND THEIR EGGS
- FOR USE ON BEDDING, FURNITURE AND OTHER INANIMATE OBJECTS INFESTED WITH LICE
- NO UNPLEASANT ODOR
- WATER-BASED FORMULA
- FOR USE ON DOGS AND ON PREMISES TO CONTROL FLEAS AND TICKS
- CONTROLS FLEAS AND TICKS ON DOGS FOR 14 DAYS

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

SHAKE CAN WELL BEFORE USING: Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches.

In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

INDOORS: To Kill Cluster Flies, Houseflies, Fruit Flies, Mosquitoes, Gnats, Wasps, Housets, Bees, Dlack Flies, Skipper Flies, Blow Flies, and Small Flying Moths: Close all doors and windows and direct spray upward into center of room with a slow sweeping motion. Spray 5-10 seconds for average room, moving toward the door. Direct spray to all parts of the room, especially windows and other light sources.

which attract these insects. Keep nozzle in constant motion. Leave room and keep area closed for 15 minutes after spraying. Ventilate room thoroughly before re-entry. Sweep up and discard fallen insects. Repeat treatment as necessary.

To Kill Cockroaches, Waterbugs, Palmetto Bugs, Silverfish, Firebrats, Crickets, Scorpians, Spiders, Millipedes, Centipedes, Sowbugs and Pillbugs: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray when ever possible. Repeat treatment as necessary.

To Kill Ants: Spray trails, nests and point of entry. Spray on ants where possible. Repeat as necessary.

To Kill Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves, and carpets. Repeat treatment as necessary.

To Kill Bedbugs: Spray mattresses particularly around tufts and seams. Take beds apart and spray into all joints. Treat baseboards, molding and floors. Repeat treatment as necessary. Allow all sprayed articles to dry thoroughly before use.

To Kill Clothes Moths and Carpet Beetles on wool and other protein naceous fibers: Remove infested articles from storage, brush thoroughly, and air for several hours in sunlight, if possible. Apply spray liberally to empty chests, closets, bureaus and other storage directing the spray into cracks, joints and crevices. After airing, infested articles may be treated by spraying lightly, keeping nozzle at least three feet from fabric to avoid staining.

Fleas in Buildings: Space Spray: Hold can 36 inches above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 sq. ft. making sure that all floor, sofa, and chair surfaces are contacted. Leave room and keep area closed for 15 minutes. Open and ventilate before reoccupying. Repeat treatment after 7 days or as needed.

To Kill Fleas & Ticks (Adults and Larvae): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering, with special attention to cracks and crevices around baseboards, and window and door frames. Infested upholstered furniture and mattresses may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

To Kill Fleas, Ticks and Lice on Dogs: Starting at the head, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to insure penetrating the coat. Dampen the fur back to the tail. Repeat application weekly if necessary to control infestations. Do not use on old, sick or debilitated animals. Do not use on cats. NOTE: Not recommended for use on puppies less than four weeks old.

To Kill Lice and Louse Eggs: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square foot for three seconds. Spray only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all sprayed articles to dry thoroughly before use.

OUTDOORS: Point spray nozzle away from face. Hold can on slight downward angle: Por best results, spray when air is calm. Allow a few minutes for product to take effect. Spray with wind if breeze is, '''' blowing.

To Kill Flying Insects: Flies, Mosquitoes, Gnats, Small Flying Moths, Hornets, Wasps and Yellow Jackets. Allow fog to drift over area. Direct spray toward bushes, or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles. Repeat as necessary.

To Kill Mud Daubers and Wasp Nests: Spray mist directly on insects and their nests from approximately 2 feet away. Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Spray into hiding and breeding places contacting as many insects as possible.

To Kill Crawling Insects: Ants, Cockroaches, including Asian Cockroaches, Crickets, Mole Crickets, Centipedes, and Silverfish. Spray infested surface of patio or picnic area, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control.

FOR THE CONTROL OF GARDEN INSECTS: For use on roses, dahlias, asters and other ornamentals to kill Japanese Beetles hit by spray, as well as Whiteflies, Aphids, exposed Thrips, Spiders, Red Mites and Leafminers.

May be used on plants, as well as a multi-purpose spray in small gardens and for spot treatments of incipient insect infestations to prevent spreading in large garden areas.

May also be used on other plants such as African Violets, Asters, Azaleas, Begonias, Camellias, Carnations, Chrysanthemums, Dahlias, Delphiniums, Dogwood, English Ivy, Euonymus, Fuschia, Geraniums, Cassula, Grape Vine, Kentia Palm, Laurel, Marigolds, Rhododendrons, Roses, Rubber Plants, Snapdragons, Stocks, Wandering Jews and Zinnias.

Effective when used as directed against Whiteflies, Aphids, Spider and Red Mites, exposed Thrips, Lace Bugs, Japanese Beetles, Pavement Ants, Clover Mites and Army Worms. When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Spray in one second bursts. Be cautious about wetting tender foliage, young plants and new growth. Do not spray when temperatures exceed 90 degree F. Contact insects directly whenever possible. Repeat treatment as infestations occur.

STORAGE AND DISPOSAL: Store in a cool dry area. do not transport or store below 32 degrees F. Wrap container in several layers of newspaper and dispose of in trash. Do not incinerate or puncture.

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

INDUSTRIAL & INSTITUTIONAL LABEL VERBAGE:

- -AUTHORIZED FOR USE IN NON-FOOD/FEED AREAS OF FOOD/FEED PROCESSING PLANTS AND OFFICIAL ESTABLISHMENTS OPERATING UNDER THE MEAT, POULTRY, SHELL EGG GRADING AND EGG PRODUCTS INSPECTION PROGRAMS.
- -CONTAINS PYRENONE AND PERMANONE
- -CONTROLS INDUSTRIAL INSECTS
- -SEEKS OUT BUGS WHERE THEY HIDE
- -KILLS ON CONTACT
- -FOR COMMERCIAL/AGRICULTURAL USE
- -A BROAD SPECTRUM INSECTICIDE HIGHLY EFFECTIVE AGAINST ANTS (INCLUDING CARPENTER ANTS), BEES, BEETLES (INCLUDING CARPET, FLOUR, GRAIN, AND

GROUND BEETLES), CENTIPEDES, CLOVER MITES, COCK-ROACHES, CRICKETS (INCLUDING MOLE CRICKETS), EAR-WIGS, FIREBRATS, FLEAS, MILLIPEDES, MOTHS, PILLBUGS, SCORPIANS, SILVERFISH, SOWBUGS, SPIDERS, TICKS, WASPS, AND OTHER PESTS LISTED ON THE LABEL

- -KILLS LICE AND THEIR EGGS
- -FOR USE ON BEDDING, FURNITURE AND OTHER INANIMATE OBJECTS INFESTED WITH LICE.
- -NON-STAINING

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- -NO UNPLEASANT ODOR
- -WATER-BASED FORMULA
- -FOR USE ON PREMISES TO CONTROL FLEAS AND TICKS
- -PROTECTS FOR UP TO {4 WEEKS}, {12 WEEKS}, {3 MONTHS}

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

SHAKE CAN WELL BEFORE USING: Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches.

Do not use in food/feed areas of food/feed establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use.

INDOORS: Cluster Flies, Houseflies, Fruit Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees, Black Flies, Skipper Flies, Blow Flies and Small Flying Moths.: Close all doors and windows and direct spray upward into center of room with a slow sweeping motion. Spray 5-10 seconds for average room, moving places contacting as many insects as possible.

CRAWLING INSECTS: Ants, Cockroaches, including Asian Cockroaches, Crickets, Mole Crickets, Centipedes, and Silverfish. Spray infested surface or patio or picnic area, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control.

STORAGE AND DISPOSAL: Store in a cool dry area. do not transport or store below 32 degrees F. Wrap container in several layers of newspaper and dispose of in trash. Do not incinerate or puncture.

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

Company Name: