

68543-1

11/28/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 28 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Jack Orman
Bengal Products, Inc.
13739 Airline Highway
Baton Rouge, LA 70817

Dear Mr. Orman:
Subject: Bengal Roach Spray
EPA Reg. No. 68543-1
Submission dated 9/19/08

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 copy of the finished labeling must be submitted prior to releasing the product for shipment.

Information about the flash point/flame extension provided for this formulation indicates that the physical and chemical hazards statements must be revised as set forth below: Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting. Do not use this product around electrical equipment due to the possibility of shock hazard.

Delete the following efficacy claims which are not supported by the attached efficacy review:

Flushes on Contact*
*Flushing insects out of hiding when directly contacted by the spray.

In accordance with the attached efficacy review, the following claim is acceptable: It is normal for insects to come out of hiding during application.

Delete the following safety claims:
No messy residue
Dry clean spray leaves no mess

Revise the If Swallowed First Aid statements as follows:
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.

Add to the Disposal Statements the following:
Nonrefillable container. Do not reuse or refill this container.

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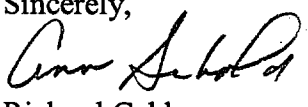
40 CFR 156.140() requires that a batch code, lot number or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance. As an alternative, you may refer consumers to the company's phone number or email address.

Please note that a notice of availability of EPA's reregistration eligibility document (RED) for products containing phenothrin (sumithrin) was published in the Federal Register on 10/22/08. Additional data and/or labeling changes may be required for products containing phenothrin. For more information, see the following website:
<http://www.epa.gov/pesticides/reregistration/status.htm>.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

for 

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

BENGAL ROACH SPRAY

KILLS ANTS, ROACHES, SPIDERS & CRICKETS

GUARANTEED TO WORK OR YOUR MONEY BACK
ODORLESS • NON-STAINING
FLUSHES ON CONTACT*

For use in Households, Schools, Warehouses, Office Buildings,
Theaters, Garages, Hotels, Motels, and Kennels

INSERT EXTENSION TUBE INTO SPRAY BUTTON:
TO KILL COCKROACHES, ANTS, CRICKETS, SOWBUGS, CENTIPEDES, SILVERFISH, FIREBRATS AND SPIDERS: Contact as many insects as possible with the spray. Spray into hiding places such as cracks & crevices, behind sinks, cabinets, along baseboards and floors, and hidden surfaces around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stove and in attics and crawl spaces. For ants, spray around ant trails, doors and windows, and other places where ants enter premises. Retreat every 4 weeks.

ACTIVE INGREDIENT:	
Permethrin	2.00%
OTHER INGREDIENTS	98.00%

CAUTION

KEEP OUT OF REACH OF CHILDREN
See Back Panel for Additional Precautionary Statements

Net Weight _____ oz. (_____ grams)

No unpleasant odor. No messy residue.
Dry clean spray leaves no mess.
Dry Spray
No odor. No Mess.

Kills insects you see and those you don't.
Dry Spray carries the killing ingredient to the roaches.
Guaranteed to Work.

* Flushing insects out of hiding when directly contacted by the spray

GUARANTEE: If you are not completely satisfied with this Bengal Product, call 225-753-1313 weekdays 8:30am - 4:00pm Central Time.

DIRECTIONS FOR USE

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

TO KILL FLYING INSECTS (mosquitoes, houseflies and gnats): Close space to be treated. Spray above head with a sweeping arm motion 3 feet from surfaces. Spray 10 seconds per 1000 cubic feet of space. Keep treated areas closed for at least 30 minutes after spraying. Ventilate area thoroughly before re-entry.

TO KILL FLEAS AND BROWN DOG TICKS: Remove and destroy pet's old bedding. Spray sleeping quarters of pets, around baseboards, window and door frames and local areas of floors.

DO NOT SPRAY ANIMALS. Old bedding should be removed and replaced with fresh clean bedding after treatment. Also treat dogs and cats with a registered flea and tick control product before allowing them to enter the treated area.

USE RESTRICTIONS: Flammable. Turn off ALL ignition sources such as pilot lights, other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.) in and around the area being treated. Never leave container in parked or unattended vehicles. This product contains a highly flammable ingredient. It may cause a fire or

ACCEPTED
with COMMENTS
In EPA Letter Dated:
NOV 28 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
68543-

explosion if not used properly. Follow the "Directions for Use" and Precautionary Statements on this label very carefully.

Do not use in commercial food processing or preparation. In the home, all food processing surfaces should be covered during treatment and thoroughly washed before use. Cover exposed food. Remove pets, birds, and cover aquariums before using.

**CAUTION
PRECAUTIONARY STATEMENTS
PHYSICAL AND 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°F may cause bursting. Do not use this product in or on electrical equipment due to the possibility of shock hazard

HAZARDS TO HUMANS

Harmful if swallowed or absorbed through the skin. Do not breath vapors. Avoid contact with skin

FIRST AID

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 – 20 minutes.
- Call a physician or poison control center for treatment advice.

IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

STORAGE AND DISPOSAL

Storage: Store in a cool area away from heat or open flame.

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.

MANUFACTURED FOR
BENGAL PRODUCTS INC.
13739 Airline Highway
Baton Rouge, LA 70817
(225) 753-1313
www.bengal.com

EPA REG. NO. 68543-1

EPA EST. NO. _____

Federal law prohibits the use of CFC propellants in aerosols.



[UPC CODE]