

68543-19

07/19/2007

115



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

JUL 19 2007

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 Dry Roach Spray  
EPA Reg. No. 68543-19  
Submission dated 4/2/07

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.

Revise the Physical and Chemical Hazards Statements to read as follows:

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully. Do not apply this product around electrical equipment due to the possibility of a shock hazard.

Revise the second paragraph of the Directions for Use as follows:

Use Restrictions:

Turn off all ignition sources such as pilot lights (shut off gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.). Call your gas utility or management company if you need assistance with your pilot lights.  
Never leave container in parked or unattended vehicles.

Revise the last sentence of the space spray instructions as follows:

Ventilate area thoroughly before re-entry.

Delete "Innovative". This is a comparative claim.

Delete the following which imply 100% efficacy:

No Roaches claims

"Prevent" claims

"Eliminate" claims

"Stop" claims

Delete all flushing claims. This product does not contain any active ingredient which is a flushing agent.

Delete the following claims. The file jacket for this registration does not contain any data to support these claims.

Keeps on working on cockroaches for 180 days 26 weeks 6 months

Inhibits Prevents reinfestation of cockroaches for up to 180 days 26 weeks 6 months

One treatment stops cockroaches from generating reproductive offspring for 180 days 26 weeks 6 months.

Bengal Dry Roach Spray keeps working in areas exposed to the sun for up to 14 days.

Keep spiders from building nests for up to 30 days.

The file jacket for this registration does not contain data for the following pests which must be deleted:

Ticks which may carry and transmit Lyme Disease

Deer ticks

German, asian and brown-banded cockroaches

Wasps bees and hornets

Delete the following implied safety claims:

Similar to naturally occurring

Works with Nature

Revise ant claims to read as follows:

Ants (except fire, harvester, pharaoh and carpenter ants).

Revise the claim "Kills roaches as they hatch" to "Kills roaches after they hatch."

Qualify "life cycle" claims to explain how this product interrupts or breaks the life cycle.

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

Sincerely,

*Ann Sibold*

*for*

Richard Gebken

Product Manager 10

Insecticide Branch

Registration Division (7505P)

# BENGAL DRY ROACH SPRAY

KILLS ROACHES, ANTS, SPIDERS, CRICKETS & MOSQUITOES

Kills Roaches as they Hatch  
Innovative Dry Spray - No Odor - No Mess - No Roaches  
**GUARANTEED OR YOUR MONEY BACK**

Effectively breaks the life cycle of German, Asian and Brown-banded Cockroaches

Keeps working on cockroaches for 180 days [26 weeks] [6 months]

Works with Nature to interrupt [break] the life cycle of cockroaches

Inhibits [Prevents] reinfestation of cockroaches for up to 180 days [26 weeks] [6 months]

Effectively controls [eliminates] cockroach populations by preventing reproduction  
[thereby eliminating future generations]

Prevents [stops] [inhibits] nymphal cockroaches from becoming adults [breeding adults]  
[reproductive adults] [egg laying adults]

One treatment stops cockroaches from generating reproductive offspring for 180 days  
[26 weeks] [6 months]

No unpleasant odor. Bengal Dry Roach Spray's flushing action forces insects out of  
hiding.

Bengal Dry Roach Spray contains an insect growth regulator (IGR) similar to naturally  
occurring insect growth hormones which interferes [stops] their growth or development

Bengal Dry Roach Spray stops [prevents] the flea and certain cockroaches from  
developing into egg laying adults.

Bengal Dry Roach Spray can be used as part of an integrated pest management (IPM)  
program

Bengal Dry Roach Spray keeps working in areas exposed to the sun for up to 14 days

Kills Ticks which may carry and transmit Lyme Disease

Contains Nylar [Insect Growth Regulator]

## ACTIVE INGREDIENTS:

Phenothrin .....	2.00%
Pyriproxyfen** .....	0.05%
OTHER INGREDIENTS.....	97.95%

\*\*Nylar® - Registered trademark of McLaughlin Gormley King Co.

## CAUTION

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

Net Weight \_\_\_\_\_ oz. ( \_\_\_\_\_ grams)

MANUFACTURED FOR  
BENGAL CHEMICAL INC.  
13739 Airline Highway  
Baton Rouge, LA 70817  
www.bengal.com

EPA REG. NO. 68543-19

EPA EST. NO. \_\_\_\_\_

ODORLESS • NON-STAINING

Contains no CFCs or other ozone depleting substances.  
Federal regulations prohibit CFC propellants in aerosols.  
The dry powerful spray penetrates deep into cracks and crevices to drive  
roaches out to die. Kills insects you see and those you don't.  
Powerful flushing action drives insects out of hiding and kills them.  
Dry spray carries the killing ingredient to the roaches.  
One treatment does it all - Flushes and Kills.

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

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
JUL 19 2007  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
68543-19

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For use in Households, Schools, Warehouses, Office Buildings, Theaters, Garages, Hotels, Motels, Buses and Kennels. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before reuse. Exposed food should be covered or removed. Do not use in commercial food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not apply this pesticide when classrooms are in use.

**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.

### ATTACH EXTENSION TUBE TO SPRAY ACTUATOR:

**TO KILL COCKROACHES, ANTS AND CRICKETS:** 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.

**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 5 seconds per 1000 cubic feet of space. Vacate area. Keep treated areas closed for at least 30 minutes after spraying. Ventilate area before re-entry.

**TO KILL SOWBUGS, CENTIPEDES, SILVERFISH, FIREBRATS AND SPIDERS:** Contact as many insects as possible with the spray. Also thoroughly spray all parts of the rooms suspected of harboring these pests. Special attention should be paid to cracks and crevices, hidden surfaces, under sinks and behind refrigerators. Treat surfaces where spider webs are seen to kill spiders and keep spiders from building webs for up to 30 days.

**TO KILL WASPS, BEES AND HORNETS:** Spray nests, flying wasps, hornets and bees directly with the product. For nests in enclosed areas hidden from direct spray, fog the enclosed area by spraying into the opening for 5 seconds in the late evening after insects have returned to the nest. Seal off access to the nest after spraying if possible. Wait at least two hours then open and ventilate the area. Do not use in enclosed areas where humans or animals will remain. Wear protective clothing if deemed necessary to avoid stings.

**TO KILL FLEAS, BROWN DOG TICKS AND DEER TICKS:** 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.

**DO NOT SPRAY ANIMALS.** Also treat dogs and cats with a flea and tick control product registered for use on pets before allowing them to enter the treated area.

## PRECAUTIONARY STATEMENTS

### Hazard to Humans and Domestic Animals

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

### 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.

#### IF 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.

### 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°F may cause bursting. Never leave container in parked or unattended vehicles. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully.

### 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.

4/5

Federal law prohibits the use of CFC  
propellants in aerosols.



[UPC CODE]

5/5