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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 8, 2011

Mr. Jack A. Orman,  
Technical Director  
Bengal Products, Inc.  
13739 Airline Highway  
Baton Rouge, LA 70817-5924

**Subject: Amended Labeling; Addition of Residual Control Claims for Cockroaches  
BENGAL DRY ROACH SPRAY 2, EPA Reg. No. 68543-19  
Your Submission Dated October 4, 2010**

Dear Mr. Orman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

General Comment(s):

1. Delete all text throughout the proposed label marked with "strike-through."

Efficacy Review comment(s):

2. Delete all of the proposed residual control claims for cockroaches. The cited study submitted in support of this registration does not support the proposed amendment because the registrant cited cat flea larvae efficacy studies which did not contain any data on cockroach efficacy or residual testing.

Optional Marketing Claims section comment(s), top right side of page 1 of 2:

3. Revise the statement "The dry powerful spray penetrates deep into cracks and crevices to drive roaches out to die." to read "The dry spray penetrates deep into cracks and crevices to kill roaches." If left the way it was, this statement is false and misleading to the consumer since it implies heightened efficacy and that it flushed out roaches. This product does not contain any active ingredient which is considered a flushing agent.

Directions for Use section comment(s), bottom right side of page 1 of 2:

4. To facilitate inclusion of required label language from the RED for phenothrin, delete all label language at the bottom right-hand side of page 1 of 2, immediately following the statement "It is a violation of Federal law ...," to appear on the subject label as a new subsection (in its own text box), that reads as follows:

**USE RESTRICTIONS**

- Apply this product only as specified on this label.
- Do not contaminate food or feedstuffs.
- For indoor use only.
- Do not use this product in commercial food/feed handling establishments, restaurants, or other areas where food/feed is commercially prepared or processed.
- Do not use this product while classrooms are in use.
- Do not allow adults, children or pets to enter the treated area for at least 30 minutes following application. Thoroughly ventilate treated areas before reoccupying.
- In the home, cover or remove all food processing surfaces and utensils, or thoroughly wash before reuse. Exposed food and drinking should be covered or removed.
- 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.
- Remove pets, birds and cover fish bowls and aquariums before application.

Precautionary Statements, Hazard to Humans and Domestic Animals subsection comment(s), page 2 of 2:

5. Revise this subsection to read "**Contains petroleum distillate.** Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Remove and wash contaminated clothing before reuse."

Precautionary Statements, First Aid Statements, HOT LINE NUMBER subsection comment(s), page 2 of 2:

6. Revise the "**HOT LINE NUMBER**" subsection to read "**For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx, 24 hours per day, 7 days per week.**"<sup>1</sup>
7. Insert the following text immediately following the revised "**HOT LINE NUMBER**" subsection: "**NOTE TO PHYSICIAN:** Contains petroleum distillate. Vomiting may cause aspiration pneumonia."

Precautionary Statements, Physical and Chemical Hazards subsection comment(s), page 2 of 2:

8. Revise this subsection to read:  

**"Physical and Chemical Hazards**

**Flammable.** Contents under pressure. Keep away from heat, sparks, and open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard. 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 & Disposal section comment(s):

9. Revise this section to read:  

**"Storage and Disposal**

**Pesticide Storage:** Keep this product in its tightly closed original container, away from heat or open flame, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

**Container Disposal:** Do Not Puncture or Incinerate! *If empty:* Non-refillable container. Do not reuse or refill container. Offer for recycling, if available. *If partly filled:* Call your local solid waste agency for disposal instructions."

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA 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 section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists 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 be 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 EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

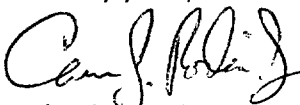
Copies of your label stamped "Accepted with Comments" and the efficacy review completed for this action are enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

<sup>1</sup> Please note that the "1-800-xxx-xxxx" telephone number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

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If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely yours,

*For* 

Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7504P)

*Enclosures:*      *Copy of label stamped "Accepted with Comments"*  
                         *Copy of efficacy review, dated February 28, 2011*

068543-00019 D440842

## BENGAL DRY ROACH SPRAY 2

KILLS ROACHES, ANTS, SPIDERS, CRICKETS & MOSQUITOES

Dry Spray - No Odor - No Messy Residue  
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]~~

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

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

~~Controls [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. No messy residue.

~~Bengal Dry Roach Spray 2 stops [prevents] the flea and certain cockroaches from developing into egg laying adults.~~

Bengal Dry Roach Spray 2 can be used as part of an integrated pest management (IPM) program

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 PRODUCTS INC.

13739 Airline Highway  
Baton Rouge, LA 70817

(255) 753-1313

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.

Dry spray carries the killing ingredient to the roaches.

**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. 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.~~

~~**Use Restrictions: Flammable.** 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.~~

~~In the home, cover or remove all food processing surfaces and utensils, or thoroughly wash before reuse. In the home, cover or remove all exposed food. 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.~~

~~Keep adults, children and pets out of treated areas for 30 minutes after application. Cover fishbowls and tanks before treatment.~~

[Revised: Feb 2010]

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ACCEPTED  
With COMMENTS  
In EPA letter Dated:  
March 8, 2011  
Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No.:  
68543-19

#### **ATTACH EXTENSION TUBE TO SPRAY ACTUATOR:**

**TO KILL COCKROACHES, ANTS (except fire, harvester, pharaoh and carpenter 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 thoroughly 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.

**TO KILL FLEAS AND BROWN DOG 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. You may also contact the National Poison Control Center at 1-800-222-1222 for emergency medical treatment information.

#### **Physical or Chemical Hazards**

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F 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.

#### **Storage and Disposal**

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

**Disposal:** Do Not Puncture or Incinerate! Nonrefillable container.

**If empty:** Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste agency for disposal instructions.

Federal law prohibits the use of CFC propellants in aerosols.



[UPC CODE]

[ ] Bracketed text is optional or alternate language

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