

68543-35

09/05/2008

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

SEP - 5 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 Product 2007A
EPA Reg. No. 68543-35
Submission dated 3/19/08

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.

Since the submitted data do not support cockroach and flea claims, the alternate brand name "Concentrated Roach & Flea Fogger II" is not acceptable.

Remove or revise the following claims, as follows:

1. ~~Concentrated Roach & Flea Fogger II~~
2. ~~Penetrates deeper to kill more (bugs)(insects)~~
3. ~~(Reduces)(controls) heavy (roach)(insect) infestations~~
4. ~~Kills(bugs)(insects)(roaches) on contact~~
5. ~~Seeks Out (Hidden)(Roaches)(Fleas)(Bugs)(Insects)~~
6. ~~(Specially)(Formulated)(for Use Against)(to Control) Heavy (Roach)(Flea)(Infestations)(Populations)~~
7. ~~(Powerful)Concentrated(Power)(Ultra)(Gold®) Fogger~~
8. ~~(Powerful)(Concentrated)(Fine)(Ultra-fine)(Fogging Mist) Fog~~
9. ~~(Penetrates)(Concentrated) to Kill More (Hidden)(Bugs)(Insects)~~
10. ~~(Powerful) Penetrating (Hi-Tech)(NanoFog™)(Formula)(Action)~~
11. Kills 18-11+ Types of Listed Insects

Remove any and all references to the following arthropods:

1. Cockroaches (including Waterbugs and Palmetto Bugs)
2. Fleas
3. Dust Mites

4. Bed bugs

The claim that the product clears yellowjackets must be qualified as follows:
Kills individual yellowjackets.

Add to the Directions for use a subsection entitled "Use Restrictions". Under this subheading, add the following:

Do not allow adults, children or pets to enter until vapors, mists and aerosols have dispersed and the treated area has been thoroughly ventilated.

Delete the following comparative claim:
Reaches more...

Add to the Directions for Use the following:
Turn off ventilation systems.

Delete "No residue" as this detracts from the directions for use.

Delete the graphic with food as it detracts from the instruction "Cover or remove exposed food".

Revise the third sentence of the Directions for use to read as follows:
Cover or remove exposed food, including pet food and water dishes.

Add an Emergency number to the First Aid statements, in accordance with PR Notice 2001-1.

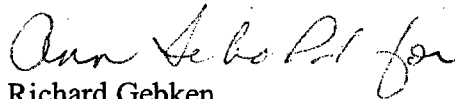
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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.

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

A copy of the efficacy review is enclosed.

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

Sincerely,

A handwritten signature in cursive script that reads "Ann Sibold for".

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

BENGAL PRODUCT 2007A

[Alternate Brand Name: Concentrated Roach & Flea Fogger II]

(Penetrating) Dry Fog
No Mess • No Odor
No (Messy) (Sticky) Residue • Non-Staining • Odorless
Penetrates Deeper to Kill More (Bugs) (Insects)
(Reduces) (Controls) Heavy (Roach) (Insect) Infestations
Kills Hidden (Bugs) (Insects)
Kills (Bugs) (Insects) (Roaches) on Contact
Kills (Bugs) (Insects) Where They (Live and) Hide
Seeks Out (Hidden) (Roaches) (Fleas) (Bugs) (Insects)
Reaches More (Hidden) (Roaches) (Fleas) (Bugs) (Insects)
(Specially)(Formulated)(for Use against) (to Control) Heavy (Roach) (Flea)
(Infestations) (Populations)
(Powerful) (Concentrated) (Power) (Ultra) (Gold®) Fogger
(Powerful) (Concentrated) (Fine) (Ultra-fine) (Fogging Mist) Fog
(Penetrates) (Concentrated) to Kill More (Hidden) (Bugs) (Insects)
Kills Bugs After You Leave (the) (Room) (House) (Area)
Penetrating (Hi-Tech) (NanoFog™) (Formula) (Action)
Easy (and Convenient) (Use)
Kills 18+ Types of Listed Insects
VALUE PACK
GUARANTEED TO WORK OR YOUR MONEY BACK

ACTIVE INGREDIENT:	
Phenothrin	2.0%
INERT INGREDIENTS	98.0%
TOTAL	100.0%

EPA REG. NO. 68543-35 EPA EST. NO. 58996-MO-1

CAUTION

KEEP OUT OF REACH OF CHILDREN
Read Label First. Read All Sides of Box.
Do not remove cans from carton except for immediate use.

NET WT. 3 - 2.7 oz. CANS = 8.1 oz. (229.6 g.)

KILLS COCKROACHES, FLEAS, TICKS, ANTS, LICE, DUST MITES, PALMETTO
BUGS, MOSQUITOES, FLIES, GNATS, SILVERFISH, CRICKETS, BEDBUGS,

CLOTHES MOTHS, GRANARY WEEVILS, WATERBUGS, WHITEFLIES, AND
YELLOW JACKETS

For Use In Homes, Apartments, Attics, Basements, Cabins, Garages,
Household Storage Areas, Kennels, Washrooms and the Non-Food/Feed
Areas of Restaurants, Hotels, Industrial Buildings, Offices, Motels,
Preschools, Schools, Theatres, Warehouses, Atriums, Closed Porches, and
Mobile Homes.

One Unit Treats up to 6,000 cubic feet. [12000 cu. ft. for 5.4 oz. size]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product
in a manner inconsistent with its labeling. In the home, all food processing
surfaces and utensils must be covered during treatment or thoroughly
washed before use. Cover or remove exposed food. Remove pets, birds and
cover aquariums before using.

**TO KILL COCKROACHES, TICKS, ANTS, LICE, DUST MITES,
PALMETTO BUGS, MOSQUITOES, FLIES, GNATS, SILVERFISH,
CRICKETS, BEDBUGS, CLOTHES MOTHS, GRANARY WEEVILS,
WATERBUGS, WHITEFLIES, AND YELLOW JACKETS:**

Use one canister for each 6,000 cu. ft. of unobstructed area (maximum).

Example: 25' long x 24' wide x 10' high = 6,000 cu. ft.

TO KILL FLEAS:

Use one canister for each 3,000 cu. ft. of unobstructed area (maximum).

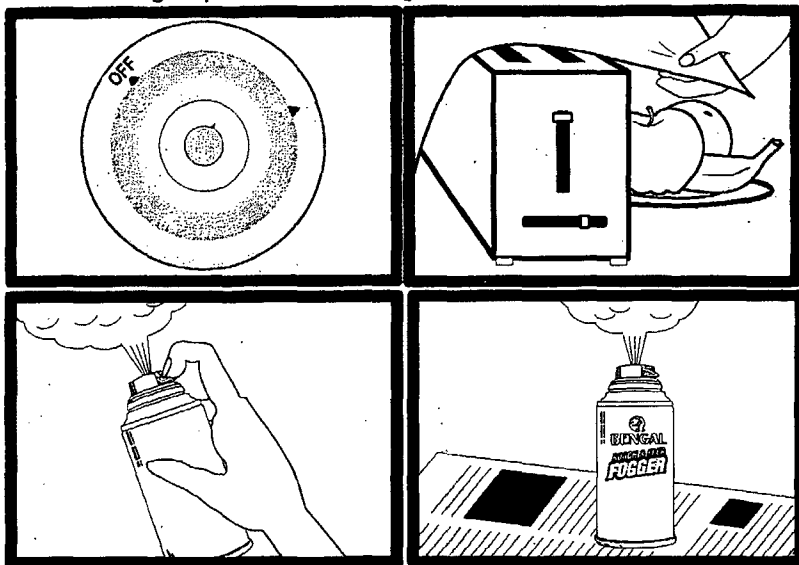
Example: 20' long x 15' wide x 10' high = 3,000 cu. ft.

PREPARATION: 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. All food
processing surfaces should be covered immediately prior to treatment or
thoroughly cleaned after treatment. Close exterior doors and windows. Open
cabinets and interior doors within the treatment area. DO NOT use more
than one fogger per room. DO NOT use in small enclosed spaces such as
closets, cabinets or under counters or tables. Do not use in a room 5 ft. X 5
ft. or smaller; instead, allow fog to enter from other rooms.

TO START FOGGING: Fogger should be placed on the floor in the middle of
the room. Place newspapers under the can to prevent marring surfaces. To
start fogging press down actuator tab to locked position. Keep it at arm's
length when activating. Point top of can away from face and eyes. Set in
upright position and leave the building at once. Leave undisturbed for 4
hours. Open doors and windows and allow to air for 15 minutes.

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[Note to reviewer: Graphics are optionally used to promote better consumer understanding of product directions]



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

**Precautionary Statements
Hazards to Humans and Domestic Animals**

Harmful if swallowed, absorbed through skin, or inhaled. Do not breathe vapor or spray mist. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to 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.

IF ON SKIN: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
IF IN EYES: Hold eyelids 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. Call a poison control center or doctor for treatment advice.
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. 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.

Highly Flammable Ingredient
Ingrediente Altamente Inflamable



STORAGE AND DISPOSAL

Do not puncture or incinerate!
If Empty: Place in trash or offer for recycling if available.
If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

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

Federal law prohibits the use of CFC propellants in aerosols.
[Contains no CFCs or other chemicals which deplete the ozone layer]



Manufactured for
Bengal Products Inc.
13739 Airline Highway
Baton Rouge, LA 70817
(225) 753-1313
www.bengal.com

[carton label -pages 1 & 2 only]

[UPC bar code]

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BENGAL PRODUCT 2007A

[Alternate Brand Name: Concentrated Roach & Flea Fogger II]

GUARANTEED TO WORK OR YOUR MONEY BACK

ACTIVE INGREDIENT:

Phenothrin	2.0%
INERT INGREDIENTS	98.0%
TOTAL	100.0%

EPA REG. NO. 68543-35

EPA EST. NO. 58996-MO-1

CAUTION

KEEP OUT OF REACH OF CHILDREN

See outer carton for additional precautionary statements

NET WT. 2.7 oz. (76.5 g.)

NOT TO BE SOLD INDIVIDUALLY

This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on the outer carton very carefully.

Highly Flammable Ingredient
Ingrediente Altamente Inflamable



DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. See outer carton for specific directions.

STORAGE AND DISPOSAL

Do not puncture or incinerate!

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

If Partially Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

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[aerosol can label - page 3 only]

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP - 5 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
68543-35

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