

08543-35

08104/2009

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 04, 2009

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

Subject: Amendment to add claims for fleas and cockroaches and to revise labeling per Agency's letter and NOR dated 09/05/08 and 09/14/07, respectively.
Bengal Product 2007A
EPA Reg. Nos. 68543-35
Application dated March 03, 2009

Dear Mr. Orman:

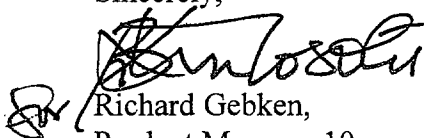
The above referenced amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)(7)(a), is acceptable subject to the following comments and/or terms for conditional registration:

- Remove all claims for, and references to cockroaches from label. A 24 hour mortality of less than 90% is not acceptable to support a "kills" claim for German cockroaches. Also only German cockroaches were used in the study, thus, the data would not have supported "a general cockroach or roach/palmetto bug claim".
- See our review (dated June 15, 2009) of your submitted Efficacy data (Enclosed and previously sent to you on 07/09/09), and revise the labeling to reflect the several comments itemized in the DER.
- The "Kills" claims for fleas are acceptable.

Please note that we have approved the amendment for the subject product with the understanding that (1) this amended labeling is consistent with the Agency's previously approved labels and (2) you have made, or will make all revisions to the labeling as requested in the Agency's letter and NOR dated 09/05/08 and 09/14/07, respectively.

Your failure to comply with the above stated conditions nullifies our conditional acceptance of the proposed labeling amendment. Revise labeling accordingly and submit final printed label to the Agency prior to releasing this product for shipment. See enclosed copies of (1) our "Product Performance/Efficacy Review", (2) Agency's letter and NOR dated 09/05/08 and 09/14/07, respectively, along with the associated previously approved stamped labels and (3) stamped label for your record. If you have any questions please contact Dr. B.A. Akinlosotu at (703) 605-0653.

Sincerely,



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

Enclosure

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

**ACCEPTED
With COMMENTS
In EPA Letter Dated:
AUG 04 2009**

**Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No.**

68543-35

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 (exposed), MOSQUITOES, FLIES, GNATS, SILVERFISH, CRICKETS, BEDBUGS, CLOTHES MOTHS, GRANARY WEEVILS, WATERBUGS, WHITEFLIES, AND EXPOSED WASPS, HORNETS, BEES & 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, including pet food and water dishes. Remove pets, birds and cover aquariums before using.

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

TO KILL COCKROACHES, TICKS, ANTS, LICE, MOSQUITOES, FLIES, GNATS, SILVERFISH, CRICKETS, BEDBUGS (exposed), CLOTHES MOTHS, GRANARY WEEVILS, WATERBUGS, WHITEFLIES, AND EXPOSED HORNETS, WASPS, BEES & 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:

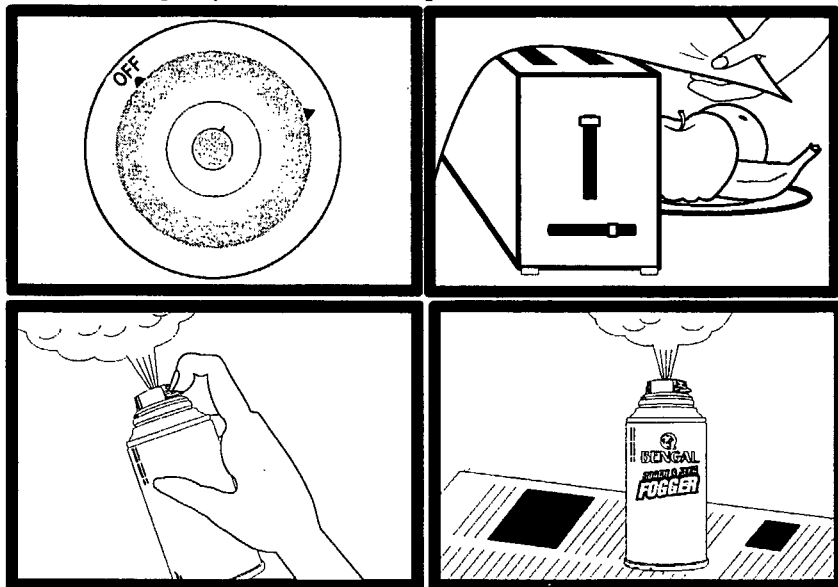
Use one canister for each 3,000 cu. ft. of unobstructed area (maximum).

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. Turn off ventilation systems.

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.

[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. You may also contact the National Poison Control Center at 1-800-222-1222 for emergency medical information.

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.

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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 - 3
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%

Manufactured for
Bengal Products Inc.
13739 Airline Highway
Baton Rouge, LA 70817
(225) 753-1313
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EPA REG. NO. 68543-35

EPA EST. NO. 58996-MO-1

[aerosol can label – page 4 only]

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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