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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 28, 2011

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

**Subject: Amended Labeling; Updates for PR Notice 98-10
BENGAL PYRETHRINS ROACH SPRAY, EPA Reg. No. 68543-37
Your Submission Dated September 28, 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."

Product Brand Name Panel section comment(s), page 1 of 3:

- 2. Revise the main product name which currently reads "**BENGAL PYRETHRIN ROACH SPRAY**" to read "**BENGAL PYRETHRINS ROACH SPRAY**"
- 3. The newly added/proposed ABN listed as "Bengal Pyrethrum Roach Spray" cannot be approved. Pyrethrum is the extract that is derived from the chrysanthemum flower, which is formulated into the active ingredient pyrethrins. The subject product contains pyrethrins, not pyrethrum, as its active ingredient.

Optional Marketing Claims section comment(s), page 1 of 3:

- 4. To incorporate missing comments contained in the NOR (dated 08-31-10) for this product, delete "ANTS, ROACHES, and SPIDERS" from the 1st optional marketing claim.

Directions for Use section comment(s), page 1 of 3:

- 5. Revise the subsection heading "**USE RESTRICTIONS AND PRECAUTIONS**" to read "**USE RESTRICTIONS.**"
- 6. Within the 4th bulleted statement, insert the word "directly" immediately preceding the word "on."

Directions for Use section comment(s), page 2 of 3:

- 7. Within the subsection heading that starts with "[**FOR USE IN HOME GREENHOUSES TO KILLS EXPOSED...**," replace the word "**KILLS**" with the word "**KILL.**"

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.

**BENGAL PYRETHRIN
ROACH SPRAY**

~~[Alternate Brand Name: Bengal Pyrethrum Roach Spray]~~

~~KILLS ANTS, ROACHES, SPIDERS & CRICKETS~~
GUARANTEED TO WORK OR YOUR MONEY BACK
NO MESSY RESIDUE • NON-STAINING

ACTIVE INGREDIENT:

Pyrethrins, botanical insecticide..... 1.00%
OTHER INGREDIENTS..... 99.00%

CAUTION

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

Net Weight _____ oz. (_____ grams)

Kills listed insects

Contains pyrethrins, a botanical insecticide derived from chrysanthemums
Dry spray leaves no mess.

The dry powerful spray penetrates deep into cracks and crevices to drive
roaches out to die.

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.

ACCEPTED
With COMMENTS
In EPA Letter Dated:
January 28, 2011
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

08543-37

USE RESTRICTIONS AND PRECAUTIONS

- Apply this product only as specified on the label
- Do not contaminate food or feedstuffs
- For indoor use only
- Do not use this product on domestic (companion) animals (dogs, cats, puppies or kittens)
- Do not apply more than 1 time per day
- Ask a doctor before use if you have asthma or are allergic to ragweed or pollens. May cause asthmatic breathing, sneezing or nasal stuffiness in sensitive persons.
- Do not allow adults, children or pets to enter until vapors mists and aerosols have dispersed, and the area has been thoroughly ventilated.
- Do not apply this product in a way that will contact adults, children or pets, either directly or through drift.
- Do not remain in treated area. Exit area immediately and remain outside the treated area until aerosols, vapors and/or mists have dispersed.
- Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.
- [When used in home greenhouse applications: Do not apply more than 10 times per year. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure, do not reapply within 24 hours. Do not harvest until spray has dried.]
- Remove pets, birds and cover fish aquariums before application.

**ATTACH EXTENSION TUBE TO SPRAY ACTUATOR
FOR USE IN THE FOLLOWING RESIDENTIAL AREAS (HOMES,
ATTICS, BASEMENTS, CELLARS, GARAGES, ENCLOSED
PORCHES, CRAWL SPACES, WALL VOIDS) TO KILL
CRICKETS AND OTHER CRAWLING INSECTS:**

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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. Do not apply more than 1 time per day.

FOR USE IN HOMES, ATTICS, BASEMENTS, CELLARS, GARAGES AND ENCLOSED PORCHES TO KILL FLYING INSECTS (small flying moths and gnats): Spray above head with a sweeping arm motion 3 feet from surfaces. Spray 5 seconds per 1000 cubic feet of space (11' x 12' room with 8' ceiling). Do not apply more than 1 time per day.

[FOR USE IN HOME GREENHOUSES TO KILLS EXPOSED STAGES OF THE FOLLOWING LISTED INSECTS: Aphids, Armyworms, Asian Lady Beetles, Bagworms, Beetles, Blowflies, Booklice, Boxelder Bugs, Cadelles, Caterpillars, Cigarette Beetles, Clothes Moths, Cicadas, Clover Mites, Crickets, Confused Flour Beetles, Crane Flies, Diamondback Larvae, Cutworms (exposed), Drain Flies, Dermestid Beetles, Earwigs, Drugstore Beetles, Firebrats, Field Crickets, Flying Moths, Fungus Gnats, Flies, Grain Mites, Fruit Flies, Granary Weevils, Grasshoppers, Gypsy Moth (adults & larvae), Katydid, Japanese Beetles, Leafrollers, Leafminers, Mealy Bugs, Loopers, Millipedes, Mole Crickets, Millers, Moth Flies, Pillbugs, Powder Post Beetles, Pinworms, Psylids, Psocids, Saw Flies, Silverfish, Small Flying Moths, Southern Red Mites, Sowbugs, Spider Mites, Stink Bugs, Tent Caterpillars, Thrips, Tobacco Moths, Web Worms, Vinegar Flies, Weevils, and Whiteflies. For flying insects, 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 (11' x 12' room with 8' ceiling).

For crawling insects, spray into hiding places such as cracks & crevices, behind hidden areas, in storage areas, and around doors and windows. Do not apply more than 1 time per day.]

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.

PRECAUTIONARY STATEMENTS 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.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

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.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • 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.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • 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 IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-222-1222</p>	
<p>NOTE TO PHYSICIAN: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.</p>	

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.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

Container Disposal: Do Not Puncture or Incinerate! If empty: Non-refillable container. Do not reuse or refill container. Offer for recycling, if

available. If partially filled: Call your local solid waste agency for disposal instructions.

Manufactured for:
BENGAL PRODUCTS INC.
 13739 Airline Highway
 Baton Rouge, LA 70817
 www.bengal.com

EPA REG. NO. 68543-37 EPA EST. NO. _____

[Federal law prohibits the use of CFC propellants in aerosols.]



[UPC CODE]

[...] text or graphics in brackets is optional

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