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January 26, 1998

Mr Stephen Smith Black Flag Insect Control Systems c/o PS&RC P.O. Box 493 Pleasanton, CA 94566-0803

Dear Mr. Smith:

Subject:

Label Amendment - PR Notice 96-6 Compliance

IRON - EPA Reg. No 69421-87 IGLOO - EPA Reg. No. 69421-89 Your February 17, 1997 Submissions

The amendments referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

- 1. Delete "Use only on dogs xxx -or- xxx on dogs" from page 1, and replace with "DO NOT USE ON CATS".
- 2. Add the following under the section beginning To Control Fleas, Ticks and Lice on Dogs:
 - a. "Sensitivities may occur after using any pesticide product for pets. If signs of sensitivity occur bathe dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately."
 - b. A retreatment interval for dogs supported by data you have on file should be specified. The interval should be stated in days, weeks or months. See PRN 96-6 for additional guidance.

Page Two EPA Reg. No. 69421-87, -89

Submit two copies of your final printed labeling before you release the product for shipment. Stamped copies of the labeling are enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosure(s)

IRON

- Controls industrial insects
- Seeks out bugs where they hide
- Kills on Contact
- For commercial/agricultural use
- A broad spectrum insecticide highly effective against ants (including carpenter ants) bees, beetles
 (including carpet, flour, grain, and ground beetles), centipedes, clover mites, cockroaches, crickets
 (including mole crickets), earwigs, firebrats, fleas, millipedes, moths, pillbugs, scorpions, silverfish,
 sowbugs, spiders, ticks, wasps, and other pests listed on the label.
- Kills Lice and their Eggs
- For use on bedding, furniture and other inanimate objects infested with lice.
- Non-staining
- No unpleasant odor
- Water-based formula
- For use on dogs and on premises to control fleas and ticks
- Controls fleas and ticks on dogs for 14 days

ACTIVE INGREDIENTS:

Pyrethrins	0.10%
Piperonyl Butoxide, Technical	0.50%
Permethrin	0.20%
INERT INGREDIENTS:	<u>99.20%</u>
TOTAL	100.00%

Equivalent to min. 0.4% (butylcarbityl)(6-propylpiperonyl) ether and 0.1% related compounds. (3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio min.: 35% (+/-) cis and max.: 65% (+/-) trans.

ACCEPTED

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for use cautions.

NOT FOR USE IN USDA MEAT AND POULTRY PLANTS

N. C. C. I.	in EPA Letter Dated
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Read entire label before each use. Use only on dogs and inanimate surfaces. -or- If used on animals, use only on dogs.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. SHAKE WELL BEFORE USING

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Servicing areas are

areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use.

INDOORS:

Cluster Flies, Houseflies, Fruit Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees, Black Flies, Skipper Flies, Blow Flies and Small Flying Moths: Close all doors and windows and direct spray upward into center or room with a slow sweeping motion. Spray 5-10 seconds for average room, moving toward the door. Direct spray to all parts of the room, especially windows and other light sources which attract these insects. Keep nozzle in constant motion. Leave room and keep area closed for 15 minutes after spraying. Ventilate room thoroughly before re-entry. Sweep up and discard fallen insects. Repeat treatment as necessary.

Cockroaches, Waterbugs, Palmetto Bugs, Silverfish, Firebrats, Crickets, Scorpions, Spiders, Millipedes, Centipedes, Sowbugs and Pillbugs: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible. Repeat treatment as necessary.

Ants: Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary:

Indianmeal Moths, Angoumols Grain Moths: Close doors and windows, direct spray into all parts of room especially around stored food product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1,000 cubic feet of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment. Repeat application as necessary.

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Exposed stages of Confused Flour Beetles, Cigarette Beetles, Drugstore Beetles, Saw-Toothed Grain Beetles, Red Flour Beetles, Rice Weevils, granary Weevils, Grain Mites in exposed adult and larvae stages: Spray into cracks and crevices, processing and handling equipment, around cartons or containers or other areas where these insects tend to congregate. Contact as many insects as possible. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. Space Spray: Spray 20 seconds per 1,000 cubic feet of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment. Repeat application weekly or as necessary. Infested stored food products should be disposed of, or treated using an approved product intended for this purpose.

Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves and carpets. Repeat treatment as necessary.

Bedbugs: Spray mattresses, particularly around tufts and seams. Take beds apart and spray into all joints. Treat baseboards, moldings and floors. Repeat treatment as necessary. Allow all sprayed articles to dry thoroughly before use.

To control Clothes Moths and Carpet Beetles on wool and other proteinaceous fibers: Remove infested articles from storage, brush thoroughly, and air for several hours in sunlight, if possible. Apply spray liberally to empty chests, closets, bureaus and other storages directing the spray into cracks, joints and crevices. After airing, infested articles may be treated by spraying lightly, keeping nozzle at least three feet from fabric to avoid staining.

Fleas in buildings - Space spray: Hold can 36 inches above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 sq. ft., making sure that all floor, sofa and chair surfaces are contacted. Leave room and keep area closed for 15 minutes. Open and ventilate before reoccupying. Repeat treatment after 7 days or as needed.

Fleas & Ticks (Adults and Larvae): Remove and thoroughly clean r 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. Infested upholstered furniture and mattresses may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

To control Fleas, Ticks and Lice on dogs: Starting at the head, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to insure penetrating the coat. Dampen the fur back to the tail. Repeat application weekly if necessary to control infestations. NOTE: Do not use on puppies less than four weeks old. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals.

To kill Lice and Louse eggs: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square

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foot for three seconds. Spray only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned Allow all sprayed articles to dry thoroughly before use.

In Animal Quarters and Milk Rooms: For rapid control of House Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees and Small Flying Moths, close windows and doors and spray at the rate of 2 seconds per 1,000 cubic feet of space. For best results, keep area closed for 10 minutes after spraying. Do not remain in treated area and ventilate after treatment is completed.

To Treat Livestock: To protect beef cattle, dairy cattle, goats, sheep, hogs and horses from attacks of Stable Flies, Horse Flies, Deer Flies, Face Flies, House Flies, Horn Flies, Mosquitoes, and Gnats: Spray about 3 seconds on each side, being careful to spray back, withers and forelegs thoroughly. To protect from Face Flies spray the face and head, but do not spray into eyes Repeat treatment when flies are troublesome.

For Swine: Do not ship animals for slaughter within 5 days of last treatment.

To control Blood Sucking Lice: Apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

To control Poultry Lice, spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

For control of Bedbugs and Mites in poultry houses, spray crevices of roost poles, cracks in walls, and cracks in nests where the bedbugs and mites hide.

OUTDOORS:

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Allow a few minutes for product to take effect. Spray with wind if breeze is blowing.

FLYING INSECTS: Flies, Mosquitoes, Gnats, Small Flying Moths, Hornets, Wasps and Yellowjackets. Allow fog to drift over area. Direct spray toward bushes or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles. Repeat as necessary.

Mud Daubers and Wasp Nests: Spray mist directly on insects and their nests from approximately 2 feet away. Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Spray into hiding and breeding places contacting as many insects as possible.

CRAWLING INSECTS: Ants. Cockroaches, including Asian Cockroaches, Crickets, Mole Crickets, Centipedes, and Silverfish. Spray infested surface of patio or picnic area, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control.

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if inhaled. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash before reuse. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before spraying. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID

If Inhaled: Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Get medical attention.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperature above 130(degree sign)F may cause bursting. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Storage: Store in a cool area away from heat or open flame and out of reach of children.

Disposal: This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. (DO NOT PUNCTURE!) If recycling is not available, wrap the container and discard in the trash.

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(DO NOT PUNCTURE!) May be recycled where steel aerosol can recycling is available. Make sure to empty the can through use. If recycling is not available, wrap the container in paper and throw in the trash.

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Empty the can by using the product according to the label (DO NOT PUNCTURE). Some recycling centers accept these steel containers. Otherwise, wrap container and discard in trash.

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Questions? Comments? See code on the bottom of the can, then call 800-887-3524.

Dist by & © 1996 Black Flag Insect Control Systems 1221 Broadway, Oakland, CA 94612

EPA Reg. No. 69421-87 EPA Est. No.___

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Complies with California Clean Air Act Standards

