



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 2, 2015

Mr. Keith Trombley  
Authorized Agent to Value Gardens Supply, LLC (DBA Value Garden Supply)  
AllPro Vector Group  
640 Griswold Street, Suite 200  
Northville, MI 48167

Subject: Pesticide Registration Improvement Act (PRIA) Labeling Amendment – Increase the Application Rates of AllPro Sustain BCG, Add Pre-Flood Application Instructions to the Directions for Use, and Make Minor Labeling Revisions  
Product Name: AllPro Sustain BCG  
EPA Registration Number: 769-992  
Application Date: September 1, 2014  
OPP Decision Number: 495278

Dear Mr. Trombley:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable under FIFRA section 3(c)(7)(A).

You must comply with the following conditions:

1. Submit and/or cite all data required for registration or registration review of your product under FIFRA when the U.S. Environmental Protection Agency (EPA) requires all registrants of similar products to submit such data.
2. Submit storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) data as these data requirements are not satisfied. A one-year study is required to satisfy these data requirements. You have 14 months from the date of this amended registration to provide these data to the EPA.
3. Submit confirmatory analysis of samples (Guideline 885.1400) data. You have 14 months from the date of this amended registration to provide these data to the EPA.
4. Repeat the submitted efficacy studies (MRID Nos. 494636-01 and 494636-02) using a similar design, providing better description of the experimental sites (e.g., water depth and amount of organic content), providing a more robust discussion of findings (e.g., statistical analyses or detailed qualitative argument), and using appropriate untreated controls. The deadline for you to

submit these required data to the EPA is March 4, 2016. Your failure to provide these data in a timely or adequate manner may result in initiation of a cancellation action against your registration.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA 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.

Your release for shipment of this product constitutes acceptance of these conditions. If you fail to satisfy these data requirements, the EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e).

If you have any questions, please contact Jeannine Kausch of my team by phone at (703) 347-8920 or via email at [kausch.jeannine@epa.gov](mailto:kausch.jeannine@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Shannon Borges".

Shannon Borges, Team Leader  
Microbial Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)  
Office of Pesticide Programs

Enclosure

[Text in brackets [ ] indicates optional language or language intended for explanatory purposes to facilitate label review. Thus, this language will often not appear on final printed labeling.]

# AllPro Sustain BCG

[Alternate Brand Name: AllPro Sustain MBG]  
Biological Larvicide

**Active Ingredient:**

*Bacillus thuringiensis* subspecies *israelensis*

Strain BMP 144 solids, spores and insecticidal toxins\* ..... 5.71%

**Other Ingredients** ..... 94.29%

**Total:** ..... 100.00%

\*Potency: Equivalent to 400 International Toxic Units (ITU) per milligram of product or 0.182 billion ITU per pound of product.

The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

### First Aid

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

**If on skin or clothing:** 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:** 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

[See [side] [back] panel for additional precautionary statements and directions for use.]

Distributed by:  
Value Garden Supply  
P.O. Box 585  
St. Joseph, MO 64502

EPA Reg. No. 769-992  
EPA Est. No. 48616-MO-1

NET WEIGHT: 40 POUNDS

[Batch Code will be stamped onto label or container at production.]

**ACCEPTED**

03/02/2015

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 769-992

## Precautionary Statements

**Hazards to Humans and Domestic Animals:** Caution: Harmful if inhaled or absorbed through skin. Causes moderate eye irritation. Avoid breathing dust. Avoid contact with skin, eyes or clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Mixers/loaders and applicators not in enclosed cabs or aircraft must wear waterproof gloves and a dust/mist filtering respirator meeting NIOSH standards of at least N-95, R-95 or P-95. Repeated exposure to high concentrations of microbial proteins can cause allergic sensitization.

**Environmental Hazards:** Do not contaminate water when disposing of equipment washwater or rinsate. Do not apply directly to treated, finished drinking water reservoirs or drinking water receptacles when the water is intended for human consumption.

## Directions for Use

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

AllPro Sustain BCG [This product] is a highly selective microbial insecticide effective against mosquitoes in a variety of habitats. Apply AllPro Sustain BCG [this product] to any water sites, except treated, finished drinking water reservoirs or drinking water receptacles when the water is intended for human consumption. AllPro Sustain BCG [This product] can be applied to areas that contain aquatic life, fish and plants.

AllPro Sustain BCG [This product] can be applied to areas used by or in contact with humans, animals, horses, livestock, pets, birds or wildlife.

Habitat	Application Rate Required for Mosquito Control*
Pools, ponds, flood water, pastures, ditches, rice fields, brackish water, woodland pools, grassy swales, lakes, ponds and other natural or man-made sites where mosquitoes may breed.	5 – 10 lbs./acre
Catch basins, tidal water, salt marshes, storm water detention areas, mangrove swamps, tires and tire pile areas of moderate pollution or organic content.	10 – 20 lbs./acre

\*Allow 24 hours for control.

## SPECIFIC APPLICATION INSTRUCTIONS:

Apply 5 – 20 pounds of AllPro Sustain BCG [this product] per acre with conventional aircraft or ground equipment. Use higher application rates in heavily polluted water, when mosquito populations are high, when larvae are nearly grown or in fourth instar, and/or when aquatic or covering vegetation is dense. Most treatments require not more than 7.5 pounds of AllPro Sustain BCG [this product] per acre. Apply only against mosquito larvae not pupae.

**Pre-Flood Application:** AllPro Sustain BCG [This product] may be applied pre-flood (pre-hatch) to breeding sites that flood intermittently. Monitor treated areas periodically for the presence of 3<sup>rd</sup> and 4<sup>th</sup> instar larvae.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment- and weather-related factors determines the potential for spray drift. The applicator and the treatment coordinator are responsible for considering all these factors when making decisions.

## Storage and Disposal

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

**Pesticide Storage:** Store in a cool, dry place.

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

**Container Handling:** Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then, offer for recycling if available, or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

## READ ENTIRE LABEL BEFORE USING

Read the entire Directions for Use and Conditions before using this product. By using this product, User and Buyer accept the following Conditions.

**CONDITIONS:** The Directions for Use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Value Garden Supply. All such risks shall be assumed by the User or Buyer.

[Optional Label Claims as Follows:]

- Biolarvicide
- Biological Mosquito Control
- Mosquito Biolarvicide Pellet
- Highly selective microbial larvicide.
- A (highly selective) microbial insecticide effective against mosquitoes in a variety of habitats.
- Easy to use.
- Ready to use.
- Effective year-round when mosquito larvae are present.
- Controls mosquitoes.
- Controls mosquito larvae (in standing water) (within 24 hours) (in 24 hours).
- Quickly controls mosquito larvae in (within) 24 hours.
- When ingested by mosquito larvae, (product name) prevents mosquitoes from becoming (developing into) breeding, biting adults.
- When ingested by mosquito larvae, (product name) prevents emergence of breeding, biting adults.
- Kills mosquito larvae upon ingestion of Bt toxins.
- Kills mosquito larvae upon ingestion by destroying the cellular lining of the insect digestive tract.
- Kills (mosquitoes) (developing mosquitoes) (mosquito larvae) (before they hatch), including those which may (can) transmit (carry) West Nile virus (and encephalitis) (and equine encephalitis).
- Kills (mosquitoes) (developing mosquitoes) (mosquito larvae) before they become breeding, biting adults, including those which may (can) transmit (carry) West Nile Virus (and encephalitis).
- Kills (mosquitoes) (developing mosquitoes) (mosquito larvae) (before they hatch), including those which may (can) transmit heartworm disease to dogs and cats.

*[769-992 AllPro Sustain BCG extended release 3-2-15]*