



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 19 2004

Cristina Griffin
Senoret Chemical Co., Inc.
c/o Delta Analytical Corp.
7910 Woodmont Ave., Suite 1000
Bethesda, MD 20814

Subject: Amendment - Reformatting label with respect to carpenter ants & bees
Terro Insect Control Dust
EPA Reg. No. 149-12
Your Submission Dated January 15, 2004

Dear Ms. Griffin:

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Revise Precautionary Statements to read as follows:

"Harmful if absorbed through skin. Avoid contact with skin, 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."

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in black ink, appearing to read "G. LaRocca".

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

Terro® Insect Control Dust

2/3

- FOR INDOOR/OUTDOOR RESIDENTIAL USE ONLY
- FOR INDOOR AND OUTDOOR USE
- FOR HOUSEHOLD USE
- HOUSEHOLD ORNAMENTAL GARDEN INSECT CONTROL
- CONTROLS FIRE ANTS, TICKS & MORE
- NON-STAINING
- ODOR-FREE FORMULA
- LONG-LASTING RESIDENTIAL ACTION
- LONG-LASTING
- KILLS INSECTS FOR UP TO 8 MONTHS
- KILLS FOR UP TO 8 MONTHS
- DOES NOT CLUMP OR ABSORB MOISTURE
- FOR USE ON ORNAMENTALS
- USE ON ROSES, FLOWERS AND ORNAMENTALS
- CONTROLS MANY DIFFERENT INSECT PESTS
- TO CONTROL IMPORTED FIRE ANTS ON LAWNS & OTHER RESIDENTIAL AREAS
- 8 OZ. TREATS 15 FIRE ANT MOUNDS
- 1 LB. TREATS 30 FIRE ANT MOUNDS
- 2 LBS. TREATS 60 FIRE ANT MOUNDS
- TREATS 45 MOUNDS (for 1 1/2 lb. size)
- GUARANTEED TO WORK OR YOUR MONEY BACK
- FAST, EFFECTIVE KILL OF FIRE ANTS
- FAST, EFFECTIVE KILL OF STINGING ANTS
- GUARANTEED EFFECTIVE
- EASY TO USE
- CONVENIENT
- WATERPROOF
- KILLS FIRE ANTS ON CONTACT
- KILLS ON CONTACT
- KILLS TERMITES*
- KILLS CARPENTER ANTS

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION. May be harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Use with care when applying in areas adjacent to any body of water. Do not contaminate water when disposing of equipment washwaters.

STORAGE AND DISPOSAL

Storage: Store product in original container in a cool, dry, locked place out of the reach of children.

Container Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE

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

IMPORTANT: Read the entire Directions for Use and Precautionary Statements and Disclaimer of Warranties before using this product. This product is a ready-to-use insecticide dust which exhibits effective knockdown and long-lasting control against the pests listed when used according to label directions. This product can be used for long-lasting pest control in and around homes and their immediate surroundings. Permitted areas of use include but are not limited to:

- *animal quarters
- *apartments
- *household greenhouses
- *houses
- *mobile homes and recreational vehicles (RV's)
- *ornamentals

This product is intended for applications with a hand duster or from the shaker can, with a paint brush or by other suitable means, to hiding and runway areas and other places where insects are found. Apply from a shaker can or with small paintbrush to inaccessible areas where insects are found.

INDOOR USE

In living areas, make applications in such a manner as to avoid deposits on exposed surfaces or introducing the material into the air.

To apply insecticide directly into cracks and crevices, use a bulbous duster or other suitable equipment. Apply lightly and uniformly to infested area. Pay particular attention to cracks and crevices; service ducts; false floors and ceilings; wall voids; around electrical and telephone fittings and equipment; around water and sewer pipes; under and behind cabinets, refrigerators and sinks; around windows and door frames; along baseboards; in attics and crawl spaces. The amount to be applied will vary with the site but should usually be in the range of 2-3 grams of product per square yard (or 0.5 lbs per 1000 square feet). DO NOT SPREAD ON CARPETS.

ANTS, CARPENTER ANTS, BOXELDER BUGS, COCKROACHES (INCLUDING BOTH RESISTANT AND NON-RESISTANT STRAINS), CRICKETS, FIREBRATS AND SILVERFISH: Apply this product thoroughly to all areas where these pests crawl and hide, especially in those areas described above. For ANTS, apply to ant trails, around doors and windows and other places where ants enter premises.

1/12/04

Page 1 of 2

* This product is not a replacement for routine termite inspections and treatments. For active infestations get a professional inspection.

ACTIVE INGREDIENT(S):
 Deltamethrin [(s)-alpha-cyano-3-phenoxybenzyl-(1R,3R) -3-(2-2 dibromovinyl)-2,2-dimethyl cyclopropanecarboxylate] . . . 0.05%
 OTHER INGREDIENTS 99.95%
 TOTAL 100.00%

EPA REG. NO. 149-12

EPA EST. NO.58996-MO-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

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

See Side Panel For Additional Precautionary Statements

NET CONTENTS: _____
ACCEPTED
with COMMENTS
in EPA Letter Dated
MAY 19 2004

g:\labels\senoret\dust011204.wpd

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

149-12

TERMITES: Apply to voids or channels in damaged wooden members of a structure; to cracks, spaces or bearing joints between wooden members of a structure; or between such members and the foundation; and in locations vulnerable to termite attack. Drilling may be necessary prior to applying dust in these locations, but it must be recognized that such drilling and treating of timber in a particular location may not result in complete coverage of infested and vulnerable voids or galleries. This dust can be applied in attics and crawl spaces to prevent entry of drywood and formosan termites at a rate of 0.5 lb per 1000 square feet of floor area. In these treatments, all vents and blowers should be closed. Inspect at 6 months and one year to insure that colony has been killed.

The purpose of such localized applications of this product is to kill termite workers or winged forms which may be present in the treated channels at the time of treatment. Such application is not recommended as sole protection against termites nor is it a substitute for mechanical alteration, soil treatment or foundation treatment.

CENTIPEDES, GROUND BEETLES, MILLIPEDES, SPIDERS AND SOWBUGS: Apply dust along and behind baseboards, to window and door frames, corners, pipes, storage locations, attics, crawl spaces, and other areas where these pests may enter or crawl.

WASPS AND BEES: It is generally advisable to treat wasp and bee nests in the evening when insects are less active and have returned to the nest. Wear protective clothing if deemed necessary to avoid stings. Using hand or power duster (Actisol or similar equipment) or other suitable means, with extension tubes if necessary, thoroughly dust nest, entrance and surrounding areas where insects alight. Nests in wall voids can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in and reseal. For ground wasps, dust entrance and surrounding areas. For best results check nests carefully one or two days after treatment to ensure complete kill, then remove and destroy nest to prevent emergence of newly-hatched insects. If removal is not feasible, retreat the nest. Do not use this product to treat overhead nests.

WEBBING CLOTHES MOTHS: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on the clothes. DO NOT apply this product directly to clothing.

CARPET BEETLES (BLACK, FURNITURE, COMMON AND VARIED): Dust where these insects are found, for example: on and under edges of floor coverings, around baseboards, under rugs and furniture, and in closets. DO NOT SPREAD ON CARPETS.

BEDBUGS: Apply dust thoroughly to all areas where these pests are typically found including: folds and tufts or mattresses, coils of springs, cracks and hollow posts of bedsteads, upholstery of chairs and sofas, picture frame moldings and all cracks and crevices in the room should be treated. Allow powder to remain in contact with surface for 4-6 hours. Thoroughly vacuum treated areas, dispose of vacuum bag and place clean linens on bed.

STORED PRODUCT PESTS:

To aid in the control of the exposed stages of:

- | | |
|------------------------|---------------------------|
| cadelles | merchant grain beetles |
| cheese mites | red flour beetles |
| cigarette beetles | rice weevils |
| confused flour beetles | rusty grain beetles |
| dark meal worms | saw-toothed grain beetles |
| drugstore beetles | spider beetles |
| grain mites | tobacco moths |
| granary weevils | yellow meal worms |
| lesser grain borers | |

In the home all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Clean up waste materials, dust, dirt and other debris. Thoroughly treat floors, walls and other surfaces in storage and handling areas. Apply dust in cracks and crevices, behind and under cupboards, and other difficult to reach areas where insects may hide. DO NOT apply directly on food, utensils or on areas where food is stored.

ORNAMENTAL PLANT PESTS

For the control of:

- | | |
|--------------------------------------|-------------------|
| aphids | leafrollers |
| beet armyworms | orange tortrix |
| blister beetles | periodical cicada |
| boxelder bugs | plant bugs |
| certain leafminers | rose chafer |
| (Boxwood, Holly, Oak, Spruce Needle) | rose midges |
| | rose slugs |
| elm leaf beetle | tent caterpillars |
| flea beetles | thrips |
| Japanese beetle | weevils |
| leafhoppers | |

SHRUBS AND ORNAMENTALS: Apply when insects or their damage first appear and repeat at weekly intervals- until insects are controlled. Apply 8 ounces per 1000 square feet; or thoroughly apply to place a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

ROSES, PETUNIAS, CHRYSANTHEMUMS, GERANIUMS, CARNATIONS AND OTHER RELATED FLOWERS. To control many leaf and flower chewing insects, apply as soon as the insect appears and repeat at 7 day intervals if the insects continue to appear. Apply a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

OUTDOOR USE

PERIMETER TREATMENT: Use this product as a residual treatment for control of *Ants, Carpenter Ants, Bees, Carpenter Bees, Centipedes, Cockroaches, Crickets, Firebrats, Ground Beetles, Millipedes, Silverfish, Slugs, Sowbugs, Spiders, Ticks* and *Wasps*. Apply around windows and doors, porches, screens, eaves, patios, garages, under stairways, in crawl spaces and other areas where pests hide. To help prevent the invasion of buildings and structures by these pests, apply thoroughly and uniformly to the foundation and crawl spaces where pests are active and may find entrance.

TICKS IN RODENT BURROWS: To control *Ticks* in and around rodent burrows around homes and other buildings, apply dust with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge). Be sure to treat abandoned rodent burrows which are suspected of containing ticks. Treat for a minimum of 5 days for light rodent populations, 10 days when populations are dense.

FIRE ANT/IMPORTED FIRE ANT MOUND TREATMENT: Apply this product with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge of the mound). Allow 3 to 4 days for maximum control, then repeat application if ants are still active. DO NOT DISTURB THE MOUND PRIOR TO APPLICATION. If possible, treat all colonies in the vicinity. Also, treat colonies which have not yet constructed a mound.

[Alternate directions - Evenly sprinkle one tablespoon (approximately 1/2 oz.) of this product over the top of each mound. Do not water in or disturb the mound. Apply when temperatures are between 65° and 80°F. Allow 3 to 4 days for maximum control, then repeat application if ants are still active. Food utensils such as a teaspoon or measuring cup should not be used for food after use with pesticides.]

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Manufactured for:
Senoret Chemical Co., Inc.
566 Leffingwell Avenue
Kirkwood, MO 63122

Phone: (24 hour emergency): 1-800-228-5635 ext. 50