

OCT 2 2003

Cheryl Purcell
Farnam Companies, Inc.
301 West Osborn
Phoenix, AZ 85014

Subject: Amended Label For:
Farnam IGR Fogger
EPA Registration No. 270-297
Application dated June 18, 2003

Dear Ms. Purcell:

The proposed amendment to the registration of the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended bringing the product label into compliance with PR Notice 2001-1 is acceptable subject to the comments listed below. A stamped copy of the amended label is enclosed for your records.

1) Since this product contains petroleum distillates, change the First Aid Statement for If Swallowed to read:

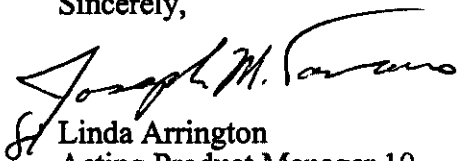
- IF SWALLOWED: * Immediately call a poison control center or doctor.
- * Do not induce vomiting unless told to do so by a poison control center or doctor.
- * Do not give **any** liquid to the person.
- * Do not give anything by mouth to an unconscious person.

2) Delete the statement, "[Nylar][brand name] can be a biorational approach to insect control."

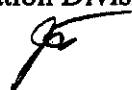
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If you have any questions or comments please contact Joseph Tavano at (703) 305-6411.

Sincerely,



Linda Arrington
Acting Product Manager 10
Insecticide Branch
Registration Division (7505C)



[] OR () indicates alternate or optional wording

FARNAM IGR FOGGER

- Total Release Fogger for Fleas with [brand name] Insect Growth Regulator
- Kills Adult and Preadult Fleas
- Prevents Reinfestation for 7 months
- ONE UNIT TREATS A ROOM OR UP TO 6,000 CUBIC FEET OF UNOBSTRUCTED SPACE [27X27X8]
- [NYLAR®][brand name] is an insect growth regulator similar to the naturally occurring insect growth hormones which interferes [stops] their growth and development.
- [NYLAR®][brand name] stops [prevents] the flea from developing into egg laying adults.
- [NYLAR®][brand name] can be used as part of an integrated pest management [IPM] program.
- [NYLAR®][brand name] can be a biorational approach to insect control.
- [NYLAR®][brand name] keeps working in areas exposed to the sun.
- Inhibits reinfestation for up to [210 days][30 weeks][7 months].
- Kills adult and preadult fleas, including flea eggs for [120 days][30 weeks][7 months].
- Prevents fleas from developing into the biting adult stage.
- Stops [prevents] hatching fleas [preadult (larval) fleas][hatching eggs (larvae)] from becoming full grown [developing into] biting adults.
- One treatment works for [210 days][30 weeks][7 months] against hatching fleas [preadult (larval) fleas][hatching eggs (larvae)].
- Kills present (today's) fleas and prevents new (tomorrow's) fleas from growing up to bite.
- [NYLAR®][brand name] activity keeps working for [210 days][30 weeks][7 months].
- Controls [stops (kills)] stages of fleas that don't look like fleas.
- Prevents [stops] the emergence of adult fleas.
- Flea eggs deposited on treated areas will not develop into adult fleas.
- Larvae crawling onto treated areas will not develop into adult fleas.
- [NYLAR®][brand name] acts on the immature life stage of the flea preventing it from developing into biting adults.
- Kills [inhibits] Cockroaches, Ticks, Spiders, Ants and other listed insects.

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- Also kills Deer Ticks and other Ixodid species that may carry and transmit Lyme Disease.
- Effective long term control.

ACTIVE INGREDIENTS:

2-[1-Methyl-2-(4-phenoxyphenoxy) ethoxy] pyridme	0.100%
Pyrethrins	0.050%
*N-Octyl bicycloheptene dicarboximide.....	0.400%
Permethrin [** (3-Phenoxphenyl) methyl (+ or -) cis-trans-3-(2,2-dichloroethenyl) , 2 dimethylcyclopropanecarboxylate.....	0.400%
Related Compounds.....	0.035%
OTHER INGREDIENTS:.....	<u>99.015%</u>
TOTAL:.....	100.000%

*MGK® 264, Insecticide Synergist

**Cis-trans isomer ratio: Max 55% (+ or -)

NYLAR®, MGK®-Registered trademarks of McLaughlin Gormley King Co.

Keep Out of Reach of Children
CAUTION

EPA Reg. No. 270-297

EPA Est. No. _____

Net Contents 6 ounces

Manufactured for:
Farnam Companies, Inc.
P.O. Box 34820
Phoenix, AZ 85067-4820

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**
OCT 2 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
270-297

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PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Avoid breathing vapors or spray mist. Avoid contact with skin or eyes. In case of contact, flush with plenty of water. Wash with soap and warm water after use. Obtain medical attention if irritation persists. Avoid contamination of food or feedstuffs.

Do not use in food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held. 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. Non-food 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). Not for USDA Meat and Poultry Plants.

Remove pets, birds, and cover fish aquariums before spraying.

PHYSICAL OR CHEMICAL HAZARDS

"Graphic Flame Symbol"

Contents under pressure. Keep away from heat, sparks, and 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 "Direction for Use" on this label very carefully.

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FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
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 INHALED:	<ul style="list-style-type: none"> • 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.
<p>In case of medical emergencies or health and safety inquiries, or in case of fire, leaking or damaged containers or for product use information, call 602-285-1660.</p>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

[NYLAR®][brand name], an insect growth regulator is similar to growth hormones that occur naturally in insects. [NYLAR®][brand name] inhibits development of the immature stages of the flea for [210 days][30 weeks][7 months] preventing them from reaching the biting adult stage.

[NYLAR® Total Release Fogger][brand name] contains a combination of three insecticides that stops [blocks (interrupts)(terminates)] the flea life cycle in three ways and controls other listed insects. The first insecticide is [NYLAR®][brand

name], an insect growth regulator, that will not allow the flea to reproduce thereby providing long term [residual] control. The second insecticide is the botanical Pyrethrum, [an extract of a Chrysanthemum flower,] which provides effective, quick-kill of insects upon direct contact and an added benefit of flushing the insects from their hiding place to aid in a more complete control [kill]. Permethrin, the third active insecticide, provides activity until [NYLAR®][brand name] takes effect.

[NYLAR® Total Release Fogger][brand name] contains a combination of ingredients that kills both adult and hatching fleas [preadult (larval) fleas][hatching eggs (larvae)]. Kills hatching fleas [preadult (larval) fleas][hatching eggs(larvae)] before they grow up to bite. [NYLAR®][brand name] the insect growth regulator in this fogger, continues to kill (control) hatching fleas [preadult (larval) fleas][hatching eggs (larvae)] for [210 days][30 weeks][7 months] by preventing their development into adults. The fogger reaches fleas [and other listed insects] hidden in carpets, rugs, drapes, upholstery, pet bedding, floor cracks and open cabinets. Occasionally adult fleas may be present in treated areas when reintroduced from infested animals.

To protect your pet against and to minimize reintroduction of adult fleas from outdoors, use EPA registered flea and tick products. [brand name] flea or flea and tick collar, [brand name] pet dust, [brand name] pet spray, [brand name] pet dip, [brand name] pet shampoo, flea shampoo or flea and tick shampoo, in conjunction with this application and prior to re-entry. As part of a complete flea control program use EPA registered [brand name] outdoor [lawn][home and garden] spray, [brand name][pressurized][Ready-to-Use][RTU] flea and tick [indoor][premise] spray.

Kill [controls] insects [on contact][such as]:

- | | | |
|--|----------------|--|
| Cockroaches [adults(nymphs)] | Sow bugs | Fleas
[adults
(larvae)(eggs)(preadult)] |
| Smokey Brown Cockroach [adults (nymphs)] | Millipedes | Ticks [that may carry and transmit Lyme Disease] |
| Brown Banded Cockroach [adults (nymphs)] | Beetles | Brown Dog Ticks |
| Asian Cockroach [adults (nymphs)] | Ground Beetles | Lone Star Ticks |
| German Cockroach [adults (nymphs)] | Elm Leaf | Deer Tick |

American Cockroach [adults (nymphs)]	Beetles	Other Ixodid species
Australian Cockroach [adults (nymphs)]	Boxelder Bug	American Dog Tick
Waterbugs [adults (nymphs)]	Earwigs	Gulf Coast Tick
Palmetto Bugs [adult (nymphs)]	Lice	Foraging Ants [Fire Ants] [Pharaoh Ants]
Carpenter Ants [Eastern (Western)]	Pillbugs	Centipedes
Dermestids [Carpet Beetles (Trigoderma)]	Clover Mites	
Granary Insects	Midge	Flying Moths [small]
Flat Grain Beetle	Flies	Almond Moth
Cadelle Rice Weevil	Gnats	Chocolate Moth
Flour Beetle	Cluster Fly	Tobacco Moth
Cigarette Beetle	Mosquito	Indian Meal Moth
Drugstore Beetle	Sciarid Fly	Indian Mealworm
Lesser Grain Borer	Firebrat	Angoumois Grain Moth
Merchant Grain Beetle	Silverfish	Hornets
Sawtoothed Grain Beetle	Booklice	Carpenter Bees
Grain Weevil	Bedbug	Wasps
Warehouse Beetle	Wood Borer (exposed stages)	Yellowjackets [Eastern (Western)]
Red Flour Beetle	Grain Mite	Cheese Mite

For use in: Apartments, Attics, Basements, Boats, Cabins, Campers, Closed Porches, Condominiums, Dormitories, Drive-Ins, Drugstores, Factories, Food Plants, Garages, Homes, Hospitals, Hotels, Institutions, Kennels, Kitchens, Motels, Nursing Homes, Office Buildings, Other Public Buildings, Pet Grooming Parlors, Pet Sleeping Areas, Railroad Cars, Restaurants, Rooms, Schools, Ships, Storage Areas, Supermarkets, Theaters, Trailers, Treehouses, Trucks, Verandahs, Warehouses, and Zoos.

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DIRECTIONS FOR USE

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

READ ALL DIRECTIONS COMPLETELY BEFORE USE

For use only when building has been vacated by human beings and pets. Ventilate area for 30 minutes before re-entry.

For best results, treat all infested areas [sites]. Use one fogger for each 6,000 cubic feet (approximately 27 ft. x 27 ft. x 8 ft. ceiling) of unobstructed area. Use additional units for remote rooms or where the free flow of fog is not assured.

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 smaller than 5 ft. x 5 ft.; instead, allow fog to enter from other rooms. Turn off ALL ignitions 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 management company if you need assistance with your pilot lights.

PREPARATION:

Remove or cover exposed food, dishes, utensils, surfaces, and food-handling equipment. Shut off fans and air conditioners. Put out all flames and pilot lights, close outside doors and windows. Remove pets and birds but leave pet's bedding as this is a primary hiding place for fleas and must be treated for best results. No need to discard pet bedding after treatment. Cover or remove fish tanks and bowls. Leave rugs, draperies and upholstered furniture in place. This product will not harm furniture when used as directed. Open interior closet doors and cabinets or areas to be treated. [Cover waxed wood floors and waxed furniture when in the immediate area surrounding the fogger.] (Newspapers may be used).

For more effective control of storage pests [Flour Beetle, Cigarette Beetle, Drugstore Beetle, Lesser Grain Borer, Merchant Grain Beetle, Sawtoothed Grain Beetle, Grain Weevil, Warehouse Beetle, Red Flour Beetle, Confused Flour Beetle] and Cockroaches [Smokey Brown Cockroach, Brown Banded Cockroach, Asian Cockroach, German Cockroach, American Cockroach, Australian Cockroach, Oriental

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Cockroach], [Crickets, (Waterbugs)(Palmetto Bugs)] open all cupboard doors [kitchen, bathrooms, pantry], and drawers for better penetration of fog. Remove all infested foodstuffs and dispose of in outdoor trash.

For flea and tick control, thoroughly vacuum all carpeting, upholstered furniture, along baseboards, under furniture and in closets. Put vacuum bag into a sack and dispose of in outside trash. Mop all hardwood floor surfaces.

READ ALL DIRECTIONS AND CAUTIONS BEFORE USING

TO START FOGGING: SHAKE FOGGER WELL BEFORE USING: Hold can at arm's length with top of can pointing away from face and eyes. Push down on finger pad until it locks. This will start fogging action. Set canister in an upright position on a table, stand, etc. (up to 30 inches in height in the center of area) and place several thicknesses of newspaper under the canister to prevent marring of the surface. Treat the whole dwelling using multiple units in homes with more than one level and numerous rooms. Leave building at once.

DO NOT RE-ENTER BUILDING FOR TWO HOURS. After two hours, open all outside doors and windows, turn on air conditioners and/or fans and let treated area air for 30 minutes before reoccupying. If additional units are used for remote rooms or where free flow of fog is not assured, increase airing-out time accordingly.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal. Store in a cool, dry place inaccessible to children and pets. **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 call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.