

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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JUL 31 1987

PENICK-BIO ULCAF Corporation
 P.O. Box 9059
 1050 Wall Street West
 Lyndhurst, NJ 07071

Attention: Mr. Patrick F. Callahan

Subject: Additional Brand Name
 EPA Registration No. 432-605

The additional brand name listed below is also being accepted under this registration. The label must be identical with the basic label except for the brand name.

ADDITIONAL BRAND NAME

RESPOND EC

The amendment referred to above, submitted in connection with registration under section 3 (c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the following conditions:

1. The following revisions apply to the proposed (draft) label for the additional brand name and the basic label for your product. The finished printed labels under which this product will be marketed must reflect these revisions.

A. Add the following statement to your label.

"This product contains the toxic inert ingredient methylene chloride."

This statement must be placed on the front panel, immediately below the ingredient statement and must appear in the same type size as that which is required for the signal word.

CONCURRENCES

SYMBOL	B-767						
SURNAME	P. Callahan						
DATE	7-12-87						

- 2. You must submit five copies of finished printed labels before you release the product for shipment, as required by PR Notice 82-2 of June 18, 1982. Your finished printed labels must also comply with the general labeling requirements of 40 CFR 162.10. Refer to the A-79 Enclosure for a description of finished labeling.

The release of the product for shipment constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e).

Sincerely yours,



Arturo E. Castillo
Product Manager 17
Insecticide-Rodenticide Branch
Registration Division (TS-767)

DIRECTIONS FOR USE (Continued)

FOR USE INDOORS AND OUTSIDE PREMISES OF HOTELS, MOTELS, HOMES, PRESCHOOLS, NURSERIES, DAY CAMPS, GREENHOUSES, LATHHOUSES, SEEDHOUSES, FOOD HANDLING ESTABLISHMENTS, PACKAGING AND PROCESSING PLANTS, COMMERCIAL, INDUSTRIAL, OFFICE, INSTITUTIONAL AND STORAGE BUILDINGS, MILK STORAGE ROOMS, MILK HANDLING AREAS OF MILK PLANTS, EGG PROCESSING PLANTS, SUPERMARKETS, RESTAURANTS, BOTTLING PLANTS, CANNERIES, FLOUR AND FEED MILLS, BAKERIES, BOATS, SHIP CABINS AND HOSPITALS. IN HOSPITALS: PATIENTS SHOULD BE REMOVED PRIOR TO TREATMENT. ALSO FOR USE IN CAMPERS, MOBILE HOMES, BUSES, AUTOMOBILES, TRUCKS, BOXCARS AND SHIP CARGO HOLDS. ALSO FOR USE IN DOG KENNELS AND HORSE STABLES. IN HORSE STABLES, NOT FOR APPLICATION IF HORSES WILL BE USED FOR FOOD.

GENERAL INFORMATION: Use this product to control the pests listed below by application of the appropriate spray dilution. Use only the dilution specified in the Directions for Use to control a particular pest. To prepare the spray, dilute this product with water as shown in the following **SPRAY DILUTION CHART**. Repeat the treatment as needed.

SPRAY DILUTION CHART

Spray Dilution Desired (% SBP-1382)	0.03%		0.07%	0.10%	0.25%
Gallons of Water	1 (3.79 L)	100 (378.5 L)	1 (3.79 L)	1 (3.79 L)	1 (3.79 L)
Amount of this product to be Diluted with Water**	1 tsp. (5 ml)	1 pint (473 ml)	2 tsp. (10 ml)	1 tbsp. (15 ml)	2 1/2 tbsp. (37 ml)

**6 teaspoons (tsp.) = 2 tablespoons (tbsp.) = 1 fluid ounce = 29.574 milliliters.

INDOORS

Space Spray: To control house flies, mosquitoes, gnats, flying moths (millers), and fruit flies use the 0.10% spray dilution. Close all doors and windows. Shut off ventilating systems, ducts and air-conditioning equipment. Mix well before using. Fill the spray tank with material, and apply as a fine spray at the rate of 2 fl. ozs. (59.1 ml) per 1,000 cubic feet (28.3 m³) or 1 gallon (3.79 L) per 64,000 cubic feet (1,812 m³). Point the nozzle upward and direct the spray mist to all parts of the room, especially windows and other light sources which attract these insects. Leave the treated area and keep closed for at least 15 minutes. Ventilate the room before re-entry. Repeat as necessary.

Contact Spray:

To control cockroaches (waterbugs), crickets, ants, scorpions, grasshoppers, silverfish (firebrats), earwigs, spiders, sowbugs (pillbugs), centipedes, millipedes, grain mites, and grain insects*, use the 0.2% spray dilution. Mix well before using. Spray thoroughly in hiding places such as cracks, crevices, and moist areas around pipes, under refrigerators and along baseboards. Spray directly on insects when possible. Repeat as necessary.

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SPIDERS: Spray directly on these pests and use repeated applications to the webbing and all cracks and crevices which harbor spiders.

ANTS-INCLUDING FIRE ANTS: Spray doors, around window frames, ant trails and hills, contacting as many ants as possible.

***GRAIN INSECTS:** Adults of confused flour beetles, sawtoothed grain beetles, red flour beetles, carpet beetles, grain weevils, Angoumois grain moths, Indian meal moths, and shiny spider beetles. Remove infested grain, cereal or flour and destroy. Avoid contamination of other food and food stuffs in the area by removing before spraying. Spray directly on exposed stages and into cracks and crevices where grain insects may be hiding. In homes, dispose of all infested products. The shelves and drawers should be cleaned and thoroughly sprayed so as to contact all pests, and covered with shelf paper after allowing shelves to dry. Any utensils that are contacted with spray should be washed before using. Repeat as necessary.

BED BUGS: Apply the 0.25% spray as a spot treatment to cracks and crevices around baseboards, floorboards, bedboards and walls. First, thoroughly clean and air mattresses and springs. Then spot treat only areas that may harbor bed bugs, concentrating on tufts, folds and seams. Repeat as necessary. For persistent infestations, consult professional applicator.

FLEAS AND TICKS ON DOGS, CATS AND PREMISES: Use the 0.25% spray dilution and apply directly to animals along back, under forelegs and on other areas, except scrotum and anus. Part hair to contact skin and insure good coverage. Hold nozzle about one foot (30 cm) away while spraying. Apply until hair is thoroughly moist. Do not spray directly in eyes or mouth of animal. Repeat within 24 hours of first treatment if necessary. To reduce reinfestation, thoroughly spray the animal's bedding and other resting areas until the surface is slightly moist. Treat the floor areas, cracks and crevices in the floor and along baseboards at the rate of two seconds per linear foot (30 cm) at a distance of 12 to 18 inches (30-45 cm). Also spray the entire inside surface of dog houses. Repeat as necessary. Hit as many insects directly as possible.

WASPS, HORNETS, YELLOW JACKETS, BEES: Use the 0.25% spray dilution. Application should be made in late evening when insects are at rest. Spray liberally into hiding and breeding places, especially under attic rafters, contacting as many insects as possible. Repeat as necessary.

ORNAMENTAL PLANTS INDOORS: In greenhouses, lathhouses, homes, commercial and institutional buildings, and for indoor landscaping: To control aphids, fungus gnats, leafhoppers, plant bugs, spittlebugs, thrips, and whiteflies on the plants listed below, use the 0.03% spray dilution.

Prior to spray application, remove infested plants from living and eating areas, and place in an area not likely to come in contact

with pets, children or food. Plants can be returned to original location when leaves dry.

If plant removal is not possible, remove or cover exposed food and food handling surfaces, including utensils, and remove animals. Shut off ventilating systems, air ducts, and air conditioning equipment. Avoid spray contact with surrounding areas.

Apply the spray to the upper and lower surfaces of plant foliage to the point of run-off. Avoid wetting blossoms if possible. Spray in the late afternoon or evening, when temperatures range from 50°F to 72°F (10°C to 22°C). Repeat applications weekly if necessary.

ageratum	daphne	inch plant	pothos
aluminum plant	dracaena	ivy: German	preyer plant
arrowhead vine	dumbcane	grape	purple waffles
aster	Easter lily	Swedish	roses
azalea	fatshedera	English	rubber plant
Baby's Tears	ferns: asparagus	marigold	salvia
begonia	Boston	Moses in Cradle	sedum
black-eyed Susan	sword	nasturtium	shamrock
bridal veil	licus	nephtyllis	snake plant
broadleaf scalia	luchsia	palms	snapdragon
calendula	gardenia	pansy	Star-of-Bethlehem
carnations	geranium	peperomia	verbena
Christmas cactus	hellotrope	pelunia	wandering jew
chrysanthemum	hibiscus	philodendron	wax plant
coleus	hoya	piggy-back plant	zebra plant
daisy	ice plant	poinsettia	zinnia

USE WITH CAUTION: on African violet, azalea, Reiger begonia, browallia, Tahitian bridal veil, caenothus, camellia, plumosa fern, gloxinia, Impatiens, geranium, oxalis, jade, primrose, cyclamen, wax begonia, spider plant, chrysanthemum, Boston fern, geranium, and friendship plant.

As with all plants listed above, especially carnations, chrysanthemums and roses, there exists a wide variety of species and cultivars, and therefore a wide range of susceptibility to injury. To ascertain possible phytotoxicity, spray a few plants as described below, wait 24 hours, and check for possible injury.

INSTRUCTIONS FOR WHITEFLY CONTROL IN GREENHOUSES ONLY See "CONTACT SPRAY" directions above for ornamental plants. Repeat application weekly for four weeks or longer for control of adults, pupae, and nymphs. Complete spray schedule on poinsettia before blooms form.

Where fewer applications are preferred, apply the 0.07% spray dilution as stated above. Repeat as necessary.

Non-thermal Applicators-Close greenhouse area to be treated for whitefly infestations.

Apply this product at the rate of 1% fl ozs (44.4 ml) thoroughly mixed in 8 fl ozs (237 ml) of methylene chloride per 10,000 cubic feet (283 m³). This is equivalent to 1 gram of active ingredient per 1,000 cubic feet (28.3 cu. meters). Direct mist first toward upper corners of the greenhouse, then apply evenly throughout the area. Keep nozzle at least three feet (1 meter) from plant foliage. Keep treated area closed off for at least two hours. Ventilate before re-entry. Apply at weekly intervals for at least four weeks. Applications should be made during the late afternoon or at night when the temperature range is 50°F to 72°F (10°C to 22°C).

INSTRUCTIONS FOR SOIL SURFACE SPRAY CONTROL OF FUNGUS GNAT LARVAE IN GREENHOUSES, LATHHOUSES, AND FOR INDOOR LANDSCAPING.

Use the 0.03% or 0.07% spray dilution to spray soil surface until thoroughly wet. Repeat at 10 day intervals, if necessary.

African violet	Marigold
Ageratum	Palm: Areca
Christmas Cactus	Neanthe Bella
Coleus	Peperomia
Cyclamen	Petunia
Dieffenbachia	Philodendron
Draceana	Pothos
Easter Lily	Poinsettia
Fern: Boston	Primrose
Ficus	Schefflera
Geranium	Snapdragon
Ivy: English	Zinnia

OUTDOORS

Premises: For use around residential, commercial and institutional buildings, gardens, greenhouses, yards, patios, mobile homes and campers. To control the pests listed below, use the 0.25% spray dilution:

House flies, mosquitoes, gnats, flying moths (millers), black flies, stable flies, deer flies, and fruit flies: Thoroughly spray breeding areas such as garbage and refuse areas, especially around poultry houses, barns, and similar areas of heavy infestation.

ANTS AND FLEAS: Same as directed above for indoor use.

FIREFLEAS: Kills and reduces annoyance for short periods of time. To reduce annoyance from ants and keep them from entering homes, spray patios, barbecue areas, driveways, entryways, door sills, window sills, other entrance areas, foundations of buildings, ant trails, around pools and areas where ants are noticed. Spray until the area is wet contacting as many insects as possible. This treatment will not kill the colonies but will reduce the immediate population for up to four hours. Repeat as necessary.

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for indoor use. Aim spray at nest openings in ground, bushes, and in cracks and crevices which may harbor nests, saturating nest openings and contacting as many insects as possible. APPLICATION SHOULD BE MADE LATE IN THE EVENING WHEN INSECTS ARE AT REST. Repeat as necessary.

CRICKETS, SILVERFISH, EARWIGS, SPIDERS, SCORPIONS, SOWBUGS, CENTIPEDES AND MILLIPEDES: Same as directed above for indoor use.

ORNAMENTAL PLANTS OUTDOORS: To control the pests listed below use the 0.03% spray dilution. Spray the upper and lower surfaces of plant foliage to the point of run-off. Spray in the late afternoon or evening, when the temperature ranges from 50°F to 72°F (10°C to 22°C) and when there is little or no wind. Spray early in the season or when the pests first appear. Weekly applications may be necessary for heavy infestations. On those plants that will flower during the season, the spray schedule should be completed before blossom formation.

To kill: aphids, fungus gnats, gypsy moths, oakworms, elm spanworms, cicada, inchworms, cankerworms (fall and spring), Japanese beetles, leafhoppers, plant bugs, spittlebugs, thrips, tussock moths and whiteflies on the following trees and shrubs:

althea	elm	laurel	podocarpus
amaranth	euonymus	lilac	rhododendron
aralia	flowering maple	locust	spirea
arborvitae	foraythia	mimosa	spruce
boxwood	hemlock	oak	sweet olive
bugleweed	holly	palm	toyon
dogwood	ixora	pitheporum	viburnum
	lantana		yew

Also, to control citrus blackflies on non-bearing citrus; cutworms and flea beetles on dichondra; lacebugs on andromeda; leafbeetles on elm; mimosa webworm on mimosa; mites, scales and budworms on spruce; sawflies and weevils on pine and Chinese evergreen; tent caterpillars on non-bearing cherry trees; beet armyworm and cutworm on carnations, chrysanthemums, snapdragon; rose slugs on roses. Spray directly on insects.

To kill: aphids, fungus gnats, leafhoppers, inchworms, plant bugs, spittlebugs, thrips, spider mites, and whiteflies on the following plants:

aster	aspidistra	ivy	malvaceae	queen sage
begonia	begonia	impatiens	roses	roses
black-eyed Susan	black-eyed Susan	impatiens	salvia	salvia
brodiaea	brodiaea	impatiens	snapdragon	snapdragon
calendula	calendula	impatiens	tabacum	tabacum
hyacinth	hyacinth	impatiens	zinnia	zinnia

USE WITH CAUTION: On African violet, ash, azalea, Reiger begonia, wax begonia, geranium, browallia, columnea, cotoneaster, caenothus, camellia, plumosa fern, gloxinia, impatiens, juniper, non-bearing mulberry and quince, oxalis, jade, primrose, cyclamen and cypress.

To kill: fungus gnat larvae use the soil surface spray method described for indoor plants on the following:

Cineraria	Pansy
Gazania	Periwinkle
Geranium	Stock
Hypericum	Verbena

TO KILL TENT CATERPILLARS: Application should be made when caterpillars are young and tents are first noticed (usually late spring). For best results, apply in the late afternoon or evening when caterpillars have returned to their tents. Aim spray directly at tents, and totally saturate on all sides. Repeat as necessary.

TO KILL GYPSY MOTH CATERPILLARS: Application should be made when caterpillars are young and are first noticed (usually late spring). Spray plants evenly to the point of run-off, applying to both sides of leaves and other areas of plants where insects are suspected. For dense evergreens and shrubs, be sure spray reaches interior leaves and branches.

As with all plants listed above, especially carnations, chrysanthemums and roses, there exists a wide variety of species and cultivars, and therefore a wide variety of susceptibility to injury. To ascertain possible phytotoxicity, spray a few plants as described above, wait 24 hours, and check for possible injury.

WARRANTY STATEMENT

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility, including injury or damage resulting from its misuse as such, or in combination with other materials.