

432-772

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

APR 29 2005

Mr. Adrian Krygsman
Bayer Environmental Science
95 Chestnut Ridge Road
Montvale, NJ 07645

Subject: Amendment-Add Food/Feed Handling Use Site
Delta Dust
EPA Reg. No. 432-772
Your Submission, Dated November 3, 2004

Dear Mr. Krygsman:

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. Under directions for use delete "(non-food/feed areas only)". The labeling now permits use in the food and non-food areas of food/feed handling establishments.
2. Under the directions for Termites, Carpenter Ants and Carpenter Bees, replace the statements beginning, "The purpose of such applications of Delta Dust is to xx etc. and ending xx can be particularly supportive of new constructions," with "For subterranean termites the purpose of such applications of Delta Dust is to kill workers or winged forms which may be present in the treated channels at the time of treatment. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but merely a supplement. For active termite infestations get a professional termite inspection".
3. Delete "Authorized for Use in the Non-Food/Feed areas of Federally Inspected Meat and Poultry Plants" and the statement beginning, "This product is acceptable for use in edible product areas of official establishments xxx etc." These authorization programs no longer exist.
4. Under directions for use following the directions of what a food area is add the following paragraph.

Non-Food/Non-Feed Areas: Examples of non-food/non-feed areas include garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, mop closets and storage (after packaging, canning or bottling).

5. Under directions for use add "feed" to the phrase food handling area i.e, "food/feed handling areas".
6. Revise the Spot, Crack and Crevice instructions to read: Spot and/or Crevice applications may be made while the facility is in operation provided exposed food is covered or removed from area being treated prior to application. Don not apply directly to food or food handling surfaces?
7. Under Carpet Beetles add the following precaution. "In residential areas do not apply as a broadcast application to floors or floor coverings".

If you have any questions in regards to this letter please feel free to contact me at 703-305-6100.

Sincerely,



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

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DeltaDust®

Insecticide

Specimen Label

- * AUTHORIZED FOR USE IN THE NON-FOOD/FEED AREAS OF FEDERALLY INSPECTED MEAT AND POULTRY PLANTS.
- * PROVIDES QUICK CONTROL OF ANTS, BEES, COCKROACHES, FLEAS, SILVERFISH, TICKS, AND NUMEROUS STORED PRODUCT PESTS.
- * KILLS CRAWLING INSECTS UP TO 8 MONTHS WHEN LEFT UNDISTURBED.
- * FOR USE INDOORS AND OUTDOORS.
- * DOES NOT CLUMP OR ABSORB MOISTURE.
- * NON-STAINING AND ODORLESS.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 29 2005**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
432-772

ACTIVE INGREDIENT:

Deltamethrin 0.05%

OTHER INGREDIENTS: 99.95%

100.00%

EPA REG. NO. 432-772

EPA EST. NO.

PRECAUCION AL USARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente.

(TO THE USER: IF you cannot read English, do not use this product until the label has been fully explained to you.)

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

In case of medical emergencies or health and safety inquiries or in case of fire, leaking or damage containers, call 1-800-334-7577.

For product information Call Toll-Free: 1-800-331-2867

See Side Panel For Additional Precautionary Statements

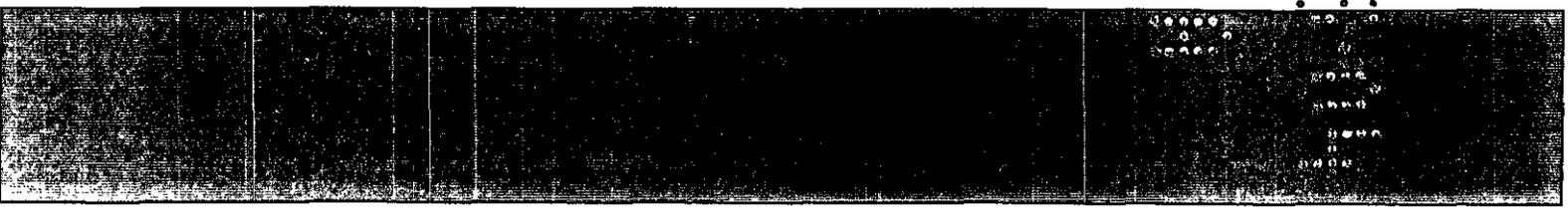
Contains

DeltaGard

Insecticide

NET CONTENTS:

BACKED by BAYER



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, to areas where surface water is present or to intertidal areas below the mean high water mark. Use with care when applying in areas adjacent to any body of water. Do not contaminate water when disposing of equipment washwater.

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, Precautions and Disclaimer of Warranties before using this product.

STORAGE AND DISPOSAL

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

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

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

Container Disposal: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.

Container Disposal: (For Homeowner) Do not reuse empty containers. **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 an indoor or outdoor drain.

Containers larger than one pound may not be used or stored in food handling establishments.

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks, or on golf courses or lawns and grounds.

DeltaDust is a ready-to-use insecticide dust which exhibits effective knock-down and residual control against the pests listed when used according to label directions.

DeltaDust can be used for residual pest control (non-food/feed areas only) in and on buildings and structures and their immediate surroundings. **Do not use in aircraft cabins.** Permitted areas of use include but are not limited to:

- *aircraft
- *animal quarters/kennels
- *apartment buildings
- *bakeries
- *breweries
- *buses
- *Canneries
- *cafeterias
- *dairies
- *food/feed manufacturing, processing and service establishments

- *greenhouses (non-commercial)
- *grocery stores and supermarkets
- *hospitals
- *hotels/motels
- *houses
- *industrial buildings and installations
- *laboratories
- *mausoleums
- *meat slaughtering and packing plants
- *mobile homes and recreational vehicles
- *nursing homes/day care centers
- *rail cars
- *restaurants
- *schools
- *sewers and underground tunnels
- *stores and institutions
- *supermarkets
- *telecommunication conduits
- *theaters
- *trucks and trailers
- *utility vaults and conduits
- *vessels
- *warehouses
- *zoos

DeltaDust is intended for applications with hand or power duster (Actisol[®] DPA or similar equipment), with a paint brush or by other suitable means, to hiding and runway areas and other places where insects are found.

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

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 DeltaDust per square yard (or 0.5 lbs per 1000 square feet).

INDOOR USE

FOOD/FEED HANDLING ESTABLISHMENT APPLICATIONS

DeltaDust applications are permitted in both food/feed and non-food areas of food/feed handling establishments as a general surface, spot, or crack and crevice treatment. Food/feed handling establishments are defined as places other than private residences in which exposed food/feed is held, processed, prepared or served. Included also are areas for receiving, storing, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) of food. Serving areas where food is exposed and the facility is in operation are also considered food areas.

This product is acceptable for use in edible product areas of official establishments operating under the Federal meat, poultry, shell egg grading, and egg products inspection programs, as a crack and crevice treatment.

General Surface Application: Do not apply as a general surface application in the food handling areas of the facility, when the facility is in operation or foods are exposed. Do not apply directly to food products. Cover or remove all food processing and/or handling equipment during application. After application in food processing plants, bakeries, cafeterias and similar facilities, wash all equipment, benches, shelving and other surfaces which food will contact. Clean food handling or processing equipment and thoroughly rinse with clean, fresh water.

Spot, Crack and Crevice Application: Spot or crack and crevice applications cannot be made in food areas while the facility is in operation. Food should

be covered or removed from area being treated. Do not apply directly to food or food-handling surfaces.

DeltaDust may also be applied as a void treatment using suitable equipment, as mentioned above, including Actisol[®] DPA equipment. Be sure to thoroughly treat service ducts, false floors and ceilings, wall voids, attics and crawl spaces. The amount of dust to be applied will vary with the site but should usually be in the range of 2-3 grams per square yard (or 0.5 lbs per 1000 square feet). Dust applications should be made in a manner to avoid deposits in exposed surfaces introducing the material in the air.

ANTS, BOXELDER BUGS, COCKROACHES (INCLUDING BOTH RESISTANT AND NON-RESISTANT STRAINS), CRICKETS, FLEAS, FIREBRATS AND SILVERFISH: Apply DeltaDust 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.

TERMITES, CARPENTER ANTS AND CARPENTER BEES: 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 Deltadust 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. Drilling Directly overhead with subsequent application of DeltaDust should be avoided. DeltaDust 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. Retreat if necessary. The purpose of such applications of DeltaDust is to kill workers or winged forms which may be present in the treated channels at the time of treatment and to impart a temporary resistance at these places to attack which may aid in the prevention of immediate reinfestation. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but merely a supplement. This supplemental treatment can be particularly supportive of new construction.

CENTIPEDES, GROUND BEETLES, MILLIPEDES, SCORPIONS, SPIDERS AND SOWBUGS: Apply DeltaDust along and behind baseboards, to window and door frames, corners, pipes, storage locations, attics, crawl spaces, and other areas which 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, if necessary. Do not use this product to treat overhead nests.

WEBBING CLOTHES MOTHS: Use Deltadust 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.

BEDBUGS: Apply DeltaDust thoroughly to all areas where these pests are typically found including: folds and tufts of 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 PANTRY & 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 |
| dermestid | spider beetles |
| drugstore beetles | tobacco moths |
| grain mites | yellow meal worms |
| granary weevils | Warehouse Moths |
| lesser grain borers | Indian meal |
| lesser mealworm | Mediterranean Flour |

II. FOOD PROCESSING PESTS

(Same crawling & flying pests as in pantry & stored product pests INDOOR) and Fruitflies, Phoridflies and Sciaridflies

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/feed, utensils or on areas where food/feed 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 |
| elm leaf beetle | rose slugs |
| flea beetles | tent caterpillars |
| Japanese beetle | thrips |
| leafhoppers | weevils |

SHRUBS AND ORNAMENTALS: Apply when insects or their damage first appear and repeat at weekly intervals or as necessary. 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 or as long as 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 DeltaDust as a residual treatment for control of *ants, bees, centipedes, cockroaches, crickets, firebrats, fleas, ground beetles, millipedes, scorpions, silverfish, slugs, sowbugs, spiders, ticks* and *wasps*. Make a residual treatment 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.

SEWER TREATMENT: Cockroach infestations in sanitary sewers may be treated with DeltaDust to provide quick knockdown and short-term population suppression. When treating sewers, one manhole per 200 linear feet should be treated. Treatments are made by removing the manhole cover and replacing with a disc of plywood bored to receive the typical flexible hose from portable or truck-mounted ventilating equipment. Apply 1-2 ounces of dust into the ventilating air to be dispersed quickly and thor-

oroughly through the system.

TELECOMMUNICATION TREATMENT: Apply Deltadust into telecommunication conduits, cracks and crevices, junction boxes, etc. using suitable application equipment (such as Actisol® DPA Duster, or other types of application equipment capable of applying the proper amount). The amount of Deltadust to be applied will vary, but should usually be approximately 1 gram of dust per cubic foot of conduit. [To calculate cubic feet, use the following equation:

$(\pi \times \text{radius}^2 \text{ of the conduit} \times \text{length of the conduit. NOTE: radius} = \text{one-half the diameter. Example: } 500 \text{ linear feet of a } 4'' (12'' = 1 \text{ foot; therefore, } 0.33 \text{ ft) conduit} = 3.14 \times (0.17 \text{ ft} \times 0.17 \text{ ft}) \times 500 \text{ ft} = 45.39 \text{ cubic feet}].$

DeltaDust can be used in areas showing signs of active termite infestations, such as underground telecommunication cable conduits, electrical cable conduits, junction boxes and manholes. Apply dust through suitable application equipment (such as the Actisol® DPA Duster, that is capable of delivering particles suspended in a low pressure air system). Applications should be made from both ends of a run of open conduit in cases where breakdown in the conduit is suspected. Deltadust can also be applied directly to the interior of the conduits after cables have been installed. Apply at the rate of 1 gram of dust per cubic foot of conduit using equipment (i.e., Actisol® DPA Duster) that is capable of delivering particles suspended in a low pressure air system.

FIRE ANTS: Apply dust with a shaker can. Thoroughly apply to adequately cover mound and around the perimeter (18" from the outer edge of the mound). A second treatment may be necessary if complete control is not obtained. **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.

FLEAS AND TICKS IN RODENT BURROWS: To control fleas and ticks in and around rodent burrows around homes and other buildings, apply Deltadust with a shaker can. **For prairie dogs thoroughly treat quarantine areas and holding areas as well as burrows in open fields.** 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 fleas and ticks. Treat for a minimum of 5 days for light rodent populations, 10 days when populations are dense. Apply as needed for control.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond Bayer Environmental Sciences's control, it is impossible for Bayer Environmental Science to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks shall be assumed by the user or buyer.

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DD-SL-041504A

