



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

JUN 29 2000

Mr. Joseph A. Conti  
Aventis Environmental Science USA LP  
95 Chestnut Ridge Road  
Montvale, NJ 07645

Dear Mr. Conti:

Subject: Amendment- Revised Use Directions and Addition of Water Soluble  
Film Packaging  
Delta Wettable Powder  
EPA File Symbol 432-832  
Your Submission Dated October 11, 1999

The Agency has completed review of your request to revise the use directions and add a water soluble film packaging for the above referenced product. Those amendments are acceptable though the following changes are requested to your label:

1. The MRID you cited to support DEER TICKS is not acceptable. MRID 44208601 relates to a granular formulation applied via a shaker can. Either submit or cite an appropriate study to support this pest or remove it from your label.
2. Similarly, the MRID you cite to support the SCORPION claim is unacceptable. MRID 420601 does not support the label claim. Either submit or cite an appropriate study to support the current label rate or remove this pest from your label. If you choose to retain SCORPIONS on your label, please ensure that the higher rate of application is clearly identified for the user.
3. If you choose to retain YELLOWJACKETS and WASPS on your label, you must include specific application instructions for the user to follow against these pests. These instructions should include information related to when to spray, how much to spray and any other precautions necessary. We suggest the following language: "Spray nest and other surfaces where (bees) may rest. Aim spray at nest openings. Applications should be made late in the evening when insects are at rest".
4. The retreatment statements should include a maximum frequency of application, such as: "... but not more than \_\_\_ times per \_\_\_."
5. Either delete the claim "long residual control" or qualify by identifying the period of

control. This should be based on efficacy data for this formulation.

- 6. EPA will issued a PR Notice revising first aid statements (2000-3). The following are the revised statements that will be required for products placed in category III and above.

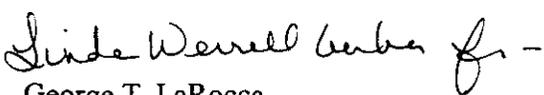
“IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately 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 eyes. Call a poison control center for treatment advice. IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.”

Also, add the following statement near the first aid statements: “Have the product container or label with you when calling a poison control center or doctor or going for treatment.”

EPA recommends that these statements be boxed and bulleted to present the information in a clear, easy-to-read fashion.

- 7. The Confidential Statement of Formula (CSF) for both the basic and alternate formulations dated October 11, 1999 replace all previously approved CSFs and are now the CSFs of record.

Prior to release of this product for shipment, please submit two (2) copies of the final, printed labeling. A stamped copy of the label is enclosed for your records. If you have any questions regarding this letter, please contact Linda Werrell Gerber of my team at (703) 308-8033.

Sincerely,  
  
 George T. LaRocca  
 Product Manager 13  
 Insecticide-Rodenticide Branch  
 Registration Division (7505C)



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In case of medical emergencies or health and safety inquiries, or in case of fire, leaking, or damaged containers, information may be obtained by calling 1-800-471-0660.

FOR PRODUCT INFORMATION, CALL TOLL-FREE: 1-800-331-2867.

**PRECAUTIONARY STATEMENTS**  
**Hazards To Humans & Domestic Animals**  
**CAUTION**

Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Contact with product may cause transient tingling and reddening of the skin. Wash thoroughly with soap and water after handling. Do not allow children or pets to enter treated areas until surfaces are dry.

**Environmental Hazards**

This product is extremely toxic to fish and other aquatic organisms. 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.

This pesticide is highly toxic to bees exposed to direct treatment. Do not apply or allow it to drift to crops or weeds on which bees are actively foraging.

**Physical & Chemical Hazards**

Do not spray DeltaGard WP Insecticide into conduits, motor housings, junction boxes, switch boxes, or other electrical equipment because of possible shock hazard.

**DIRECTIONS FOR USE**

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

Not for use in commercial greenhouses, nurseries, sod farms, or grass grown for seed. Not for use on golf course turf.

**GENERAL INFORMATION:**

[Each DeltaPack contains a pre-measured 6.7 ounce dose of Delta Wettable Powder (WP) sealed in a water-soluble film.] Delta WP contains 5.0% by weight active ingredient and will provide effective knockdown and residual control of various pests outdoors around residential and commercial buildings and structures. [Delta WP is designed for use in power spray equipment and will provide effective knockdown and long residual control of the pests listed on this label.] [Delta WP is a wettable powder designed for use in hand-held, backpack and power spray equipment and will provide long-term residual control of mosquitoes and other public health pests.]

[Do not allow the inner packets to become wet before adding to the spray tank Do not handle the clear inner packets of Delta WP insecticide with wet hands or gloves. Rough handling may cause breakage.]

Delta WP does not damage paints, plastics, fabrics or other surfaces where water alone causes no damage. To ensure against possible damage to delicate material, test a small inconspicuous area before treatment.

**Mixing Instructions:**

[The water-soluble inner package contains Delta WP.]

[To prepare the spray mixture, fill sprayer with one-half the total volume of water to be used. Drop the proper number of unopened inner pouches (see rate table) into the spray tank. Fill tank with remaining water and then start agitator [begin agitation]. Depending on the water temperature and the degree of agitation, the

packets should be completely dissolved within a few minutes from the time they were added to the water.] [Delta WP is intended to be mixed with water and applied with hand pressurized or power operated sprayers as a coarse spray. When diluting, add water to the spray tank and the appropriate amount of Delta WP. Thoroughly agitate the sprayer before using to insure proper suspension of the wettable powder.]

If spraying is interrupted, re-agitate before continuing application.

If spray screens are used, they should be 50 mesh or larger.

[NOTE: Do not use water-soluble PVA packets in a tank mix with products that contain boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic that is not soluble in water or organic solvents such as oils, kerosene, gasoline, or alcohol. Use of chlorinated water is acceptable.]

**Tank Mixing:**

Delta WP insecticide may be tank-mixed with other currently registered pesticides unless expressly prohibited by the product label. [However, the water-soluble packets must be completely dissolved before adding any other products.] A small volume mixing test with other products is recommended to ensure compatibility. Observe all restrictions and precautions which appear on the labels of these products.

**Application Rates:**

Pests	Concentration of Active Ingredient	Dilution Rate			
		Small Scoops* Per 1 Gallon	Large Scoops* Per 5 Gallons	Water Soluble Packs	
				In 25 Gal	In 100 Gal
ants, firebrats, gnats, midges, centipedes, silverfish	0.01% - 0.03% w/w	1 - 3 scoops	1 - 3 scoops	1 - 3 packs	4 - 12 packs
bees, cockroaches, crickets, fleas, flies (including such flies as stable, house, cluster and horseflies), hornets, mosquitoes, pillbugs, scorpions, sowbugs, spiders, ticks (including black-legged ticks or deer ticks), yellowjackets, wasps	0.03% - 0.06% w/w	3 - 6 scoops	3 - 6 scoops	3 - 6 packs	12 - 24 packs
termites (formosan & other subterranean - localized control only)	0.06% w/w	6 scoops	6 scoops	6 packs	24 packs
carpenter ants	0.03% w/w	3 scoops	3 scoops	3 packs	12 packs

\*one small scoop = 0.8 ounce; one large scoop = 4.0 ounces

**GENERAL PEST CONTROL OUTDOORS**

Use Delta WP to control outdoor pests by application as either a perimeter treatment, residual spray or broadcast application to lawns, grounds and landscape ornamental plantings.

**Treatment Sites:** When used in accordance with label directions, Delta WP may be applied as a perimeter treatment or as a residual spray around residential and non-residential settings. Begin applications when pests are noticed.

**Perimeter Treatments:** To help prevent infestation of buildings, apply Delta WP where pests are active and may find entrance. It is recommended to treat a band of soil or lawn up to 6 - 10 feet wide around and adjacent to buildings and treat the building foundation to a height of 2 to 3 feet. Apply as a coarse spray of 0.01% to 0.06% suspension (see rate table). Use an adequate volume to thoroughly and uniformly wet the barrier area but do not allow run-off to occur. Repeat treatment if reinfestation occurs.

**Residual Spray:** Apply Delta WP as a coarse low-pressure spray of 0.03% to 0.06% suspension (see rate table) to surfaces of buildings, porches, screens, window frames, eaves, patios, refuse dumps, tire piles, garages and lawns. For control of severe infestations and longer residual control use the 0.06% rate. Repeat treatment if reinfestation occurs.

**Fleas and Ticks:** Apply Delta WP as a coarse wet spray of 0.03% - 0.06% suspension to areas where fleas and ticks are most likely to be found, such as but not limited to, dog houses, kennels, runways, cracks and crevices in sidewalks, paths or patios, under plants, shrubs, bushes, trees, or other shaded, moist areas where pests may rest.

**Fire Ants:** Apply Delta WP as a drench at 1 to 2 gallons of 0.06% suspension over the surface of each mound and surrounding area to a 2-foot diameter. For best results, apply in cool weather, 65 to 80°F or in early morning or late evening hours. Treat new mounds as they appear. Pressurized sprays may disturb the ants and cause migration, reducing product effectiveness.

**General Surface Application For Flying Insect Pests (such as flies, gnats, midges, and mosquitoes):** Apply 0.01% to 0.06% suspension (see rate table) at a rate of 1 gallon per 1,000 square feet. Do not allow dripping or run-off to occur. Spray evenly on all surfaces of houses ensuring areas such as eaves are thoroughly treated. Apply directly to walls, ceilings, window screens and other resting areas as a residual surface treatment to residential buildings, as well as in and around carports, garages, storage sheds, unoccupied horse stables and pet kennels. Treatments may also be applied to athletic fields, recreational areas, lawns & grounds, residential areas, parks, tire piles, public and commercial sites.

**Wood-Infesting Insects:** For control of wood-infesting beetles on surfaces around homes and other structures, apply a 0.06% suspension of Delta WP. For control of above-ground termites inside trees, utility poles, fencing and decking materials and similar structural members, drill to find the interior infested cavity and inject 0.06% suspension using an appropriate treatment tool with a splashback guard.

Termite carton nests in trees may be injected with 0.06% suspension using a pointed injection tool. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from trees when such nests are found.

The purpose of such applications of Delta WP is to kill workers or winged reproductive forms which may be present at the time of treatment. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but are merely a supplement.

For protection of firewood from carpenter ants and termites, treat soil beneath firewood prior to stacking with a 0.06% suspension at 1 gallon per 8 square feet to prevent carpenter ant or termite infestation. DO NOT treat firewood with this product.

For control of carpenter ants around homes and other structures, use a 0.03% suspension and apply as a general surface, spot, or crack and crevice application. Repeat treatments when necessary. Apply around doors and windows and other places where carpenter ants may enter the premises. Use a sufficient amount of coarse spray to cover the area. Do not exceed 1 gallon of dilute suspension per 1000 square feet of treated surface.

For control of carpenter ants inside trees, utility poles, fencing and decking materials and similar structural members, drill to find the interior infested cavity and inject 0.03% suspension using an appropriate treatment tool with a splashback guard. Retreat as needed.

For control of tunneling carpenter ants in soil, apply a 0.03% suspension as a drench or inject the suspension

at intervals of 8 to 12 inches. Establish a uniform vertical barrier at the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surfaces.

For control of carpenter bees in structures, apply a 0.03% suspension directly into gallery entrance holes. Following treatment, the entrance holes may be left open 24 hours to be certain that returning adult bees are killed. When there is no activity, the hole may be sealed with a suitable sealant.

**FOR CONTROL OF MOSQUITOES THAT MAY TRANSMIT MALARIA, ARBOVIRUSES OR ENCEPHALITIS**

**General Surface Application:**

Apply 0.03% to 0.06% suspension (see rate table) at a rate of 1 gallon per 1,000 square feet. Do not allow dripping or run-off to occur. Spray evenly on all surfaces of houses ensuring areas such as eaves are thoroughly treated. Also spray other buildings adjacent to the house such as animal shelters where mosquitoes may rest. For best results, all houses in the area should be sprayed and therefore access to as many houses as possible is important.

**TURFGRASS APPLICATIONS**

Delta WP controls a broad spectrum of insects on turfgrasses and landscape ornamental plants in outdoor areas such as athletic fields, recreational areas, residential landscapes, parks, and public and commercial sites. Uniform coverage is essential. Begin applications when pests are evident and repeat as needed.

Apply Delta WP as a broadcast application using a conventional hydraulic boom-type sprayer or other suitable equipment for turfgrass pests according to the rates listed in the Application Rates for Turfgrass Sites table. Apply using a minimum of 2 gallons of water per 1000 sq. ft. Higher volumes (4 to 10 gallons of water per 1000 sq. ft.) may be needed for adequate coverage of dense turfgrass canopies and/or turfgrasses maintained under high mowing heights.

Target insects must be exposed to the insecticide to be controlled. For optimum control of surface-feeding insects, delay irrigation or mowing for 24 hours after application. For subsurface-feeding insects, irrigate with 0.25 to 0.5 inch of water immediately after application.

**Tank Mixing:** Delta WP Insecticide has been found to be compatible with many commonly used pest control and fertilizer products. When tank-mixing Delta WP, observe all restrictions and precautions and limitations that appear on the label of each product. The water-soluble packets must be completely dissolved before adding any other products. For any tank-mixture which has not been previously tested, mix the correct proportion of products and water in a quart jar to ensure proper physical compatibility of the mixture. Tank mixtures of Delta WP with silicone surfactants may improve the control of some insects.

**NOTE:** In New York State, product may not be applied to turf within 100 feet of a coastal marsh or stream that drains directly into a coastal marsh. For control of turf insects in New York, a second application may be made after two weeks if target insect activity persists.



**Application Rates For Turfgrass Sites:**

Sites	Pests	Rates	Remarks
Athletic fields, recreational areas, lawns & grounds, residential areas, parks, public and commercial sites	armyworms, cutworms, sod webworms	1 pack per 15,200 to 30,400 sq. ft.	Apply when pests become evident.
	ants, centipedes, chiggers, cockroaches, crickets, grasshoppers, ground beetles, Japanese beetles (adults), leafhoppers, mealybugs, pillbugs, sowbugs, springtails, ticks (including black-legged ticks or deer ticks)	1 pack per 11,400 to 15,200 sq. ft.	Apply as a broadcast spray in a minimum of 2 gallons of water per 1,000 sq. ft.  Delay irrigation or mowing for 24 hours after application for optimum control of surface-feeders, cutworms and webworms.
	annual bluegrass weevil (adult), billbugs (adult), black turfgrass ataenius (adult), chinch bugs, fleas (adult), mites*, mole crickets, scorpions, spiders	1 pack per 7,000 to 11,400 sq. ft.	For subsurface-feeders, such as mole crickets, irrigate with 0.25 to 0.5 inch of water immediately after application.  The addition of a silicone surfactant may enhance mole cricket control.

\*Suppression Only

**LANDSCAPE ORNAMANTAL TREATMENTS**

Delta WP Insecticide provides control of a wide range of insects on landscape ornamentals. Mix Delta WP with the required amount of water according to the Application Rates for Landscape Ornamentals table below. Thoroughly apply the finished spray to upper and lower leaf surfaces to ensure adequate coverage, but prior to dripping. Be sure to penetrate dense foliage to wet leaves, trunk and branches.

Plant safety testing has been conducted on many species of ornamental plants under a wide range of environmental and cultural conditions and no injury has been observed. If local use information is not available, it is advisable to pre-spray a few plants.

**Application Rates for Landscape Ornamentals:**

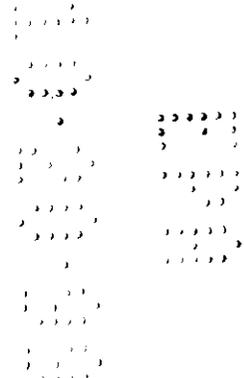
Sites	Pests	Rate	Remarks
Landscape ornamentals including trees, shrubs, evergreens and foliage plants	Adelgids, ants, aphids, azalea caterpillar, azalea lace bugs, bagworms, boxelder bugs, California oakworms, cankerworms, cardomom thrips, casebearers, crickets, elm leaf beetles, elm spanworms, European pine sawflies, fall webworms, firebrats, flea beetles, fleas, fungus gnats, grasshoppers, greenstriped mapleworm, Gypsy moth (larvae), imported willow leaf beetles, Japanese beetles (adults)*, June beetles (adults), lace bugs, leaf-feeding caterpillars, leafhoppers, leafminers, leaf rollers, leaf skeletonizers, mealybugs, midges, mimosa webworms, mites**, orangestriped oakworms, pillbugs, pine shoot beetles, pine tip moths, pinyon spindlegall midges, plant bugs, redhumped caterpillar, red imported fire ants, sawfly larvae, silverfish, sowbugs, springtails, spanworms, scale insects (crawlers), spittlebugs, tent caterpillars, webworms, yellownecked caterpillar	1 pack in 100 gallons of water	Apply when pests become evident.  Thorough coverage is required for best results.  Apply with sufficient water to ensure coverage of upper and lower leaf surfaces.

\* Will provide anti-feedant properties on treated ornamentals against Japanese beetles.

\*\* Suppression only.

**NOTES:**

1. DO NOT apply Delta WP through any type of irrigation system.
2. DO NOT apply this product to edible crops.



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INDIVIDUAL FOIL ENVELOP CONTAINING WATER-SOLUBLE PACKET

DeltaPack™

**ACTIVE INGREDIENT:**

Deltamethrin 5.00%

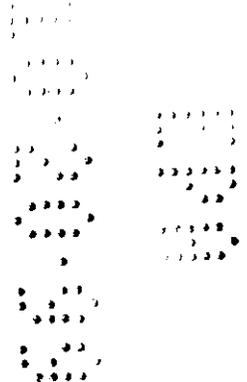
**OTHER INGREDIENTS:** 95.00%

100.00%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See Container/Enclosed Booklet for Complete Directions for Use, Precautionary Statements and First Aid

EPA Reg. No. 432-832



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### STORAGE & DISPOSAL

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

**Storage:** Mix as needed. Do not store diluted material. Store in original container in a secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

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

**Container Disposal:** [Water Soluble Packets - When all packets are used, dispose of empty package in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.] [All other containers - Empty container completely into application equipment. Do not reuse empty container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.]

### IMPORTANT: READ BEFORE USE

By using this product, user or buyer accepts the following conditions, warranty, 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 AgrEvo Environmental Health's control, it is impossible for AgrEvo Environmental Health 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.

**DISCLAIMER OF WARRANTIES:** THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED OF MERCHANTABILITY OR OF FITNESS FOR PARTICULAR PURPOSE OR OTHERWISE, WHICH EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of AgrEvo Environmental Health is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. AgrEvo Environmental Health disclaims any liability whatsoever for incidental or consequential damages, including, but not limited to, liabilities arising out of breach of contract, express or implied warranty (including warranties of merchantability and fitness for a particular purpose), tort, negligence, strict liability or otherwise.

**LIMITATION OF LIABILITY:** THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT AGREVO ENVIRONMENTAL HEALTH'S ELECTION, THE REPLACEMENT OF PRODUCT.

**AgrEvo Environmental Health**  
95 Chestnut Ridge Road  
Montvale, NJ 07645

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