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Systems Integration Group, Inc.



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number

432-869

Date of Issuance

JUN 24 1999

Term of Issuance Conditional

Name of Pesticide Product

Saga WP Insecticide 228

NOTICE OF PESTICIDE:

x Registration

Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A), provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. Make the following labeling changes:
 - a) Revise the EPA Registration Number to read "EPA Reg. No. 432-869"
 - b) We can not find in your jacket, nor in the jacket of the cited product (EPA Reg. No. 432-755) any efficacy data to support label claims for fire ants and pharaoh ants. Please submit or cite (with the appropriate MRID numbers) efficacy data for these pests or remove them from your label. Please note that if you choose to submit efficacy data for fire ants this must be based on field tested data. Finally, we have noted that your tick data was not based on field tested data. Please submit field tested tick data to support your tick claims. Alternatively, you may specify that your product will not control ticks, but will kill on contact. We regret that we missed these pests when we asked you for efficacy data previously.

Signature of Approving Official:

George T. LaRocca
for George T. LaRocca

Date:

JUN 24 1999

- c) Please remove the following pests from your label: hornets, bees, killer bees, wasps, yellow jackets, and scorpions. The efficacy data you submitted are not adequate to support these claims due to low mortality rates, incomplete testing protocols or unclear application methods. We have attached copies of the reviews for your records.
- d) Under GENERAL INFORMATION, please delete the statement that Saga WP will provide "long residual control" or provide the residual time period of control. Your efficacy data does not support a "long residual control" claim for all the pests on your label. Additionally, please delete the bullet "For residual control of major nuisance pests" for the same reason.
- e) Delete all "Repeat treatment/Retreat as necessary" - type statements and state the minimum allowable time period between applications. This should be based on your efficacy data.
- f) Please delete references to Saga WP throughout your label, and instead use your product's name - Saga WP Insecticide 228. Additionally, please make sure your EPA Reg. No. reads "432-869" and not "432-755" as it currently reads.

Your certification regarding child-resistant packaging has been reviewed and approved. We have placed a copy in your file for our records.

- 3. Please submit two (2) copies of your final printed label for before your release the product for shipment. Please refer to the A-79 enclosure for a further description of final printed labeling. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

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

EPA

JUN 24 1999

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

432-869

SAGA® WP

INSECTICIDE 228

- * FOR RESIDUAL CONTROL OF MAJOR NUISANCE PESTS
- * ONLY FOR SALE, USE AND STORAGE BY PEST CONTROL OPERATORS
- * DESIGNED FOR USE IN FOOD/FEED AND NON-FOOD/NON-FEED AREAS OF FOOD/FEED PROCESSING PLANTS.
- * FOR USE IN USDA INSPECTED FACILITIES

ACTIVE INGREDIENT:

(1R, 3S) 3[(1'RS) (1', 2', 2', 2' -tetrabromoethyl)]
-2, 2-dimethylcyclopropanecarboxylic acid (S)-
alpha-cyano-3-phenoxybenzyl ester 1 / ... 40.00%

INERT INGREDIENTS: 60.00%
100.00%

©SAGA is a registered trademark of AgrEvo S.A.
1/ Tralomethrin.

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

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

EPA REG. NO. 432-755

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN

WARNING

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink 1 or 2 glasses of water and induce vomiting by touching the back of throat with a finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated. Get medical attention.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

See Side Panel For Additional
Precautionary Statements

NET CONTENTS:

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PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

WARNING

May be fatal if swallowed. Harmful if absorbed through the skin or inhaled. Causes eye irritation. Avoid breathing dust or spray mist. Avoid contact with skin, eyes or clothing. Contact with product may result in transient tingling and reddening of the skin. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Get medical attention if irritation persists. Remove pets and cover aquariums and terrariums before spraying.

Environmental Hazards

This pesticide is extremely toxic to fish and other aquatic organisms, including crab and shrimp. Do not apply directly to water, or 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. Remove pets and cover aquariums and terrariums before spraying.

Physical & Chemical Hazards

Do not use water based sprays of SAGA WP in conduits, motor housings, junction 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.

STORAGE AND 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 secured dry storage area. Prevent cross-contamination with other pesticides and fertilizers. If the container is leaking and/or material is spilled, on floor or paved surfaces, sweep up and remove to chemical waste area. Concentrate is stable at normal storage temperatures.

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

GENERAL INFORMATION:

Saga WP is a wettable powder insecticide containing 40% by weight active ingredient which will provide effective knockdown and long residual control of the pests listed on this label.

Saga WP does not damage paints, plastics, fabrics or other surfaces where water alone causes no damage.

Saga WP is intended for use by professional applicators in and around residential and nonresidential structures and their immediate surroundings and on various modes of transportation. Permitted areas of use include, but are not limited to the Food/Feed and Non-Food/Non-Feed Areas of;

aircraft	industrial buildings and
apartment buildings	installations
bakeries	laboratories
bottling facilities	marine vessels
breweries	mausoleums
buses	meat, poultry and egg

SAGA® WP

cafeterias	processing and packing plants
candy plants	nursing homes
canneries	railcars
food manufacturing,	restaurants
processing and servicing	schools
establishments	ships and vessels
grain mills	stores and institutions
granaries	trailers
greenhouses	trucks
(non-commercial)	warehouses
hospitals	wineries
hotels	
houses	

Treatments may be repeated as necessary to maintain adequate control.

MIXING INSTRUCTIONS:

Saga 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 Saga WP. Thoroughly agitate the sprayer before using to insure proper suspension of the wettable powder. Re-invert sprayer before use if spraying is interrupted. If spray screens are used, they should be 50 mesh or larger. Dilute Saga WP insecticide only with water.

DOSAGE CHART:

This product is intended for dilution prior to applications as directed in the table below. Use the scoop provided for measuring from the jar. Each level scoopful contains 0.1 oz. Saga WP.

Pests	Concentration of Active Ingredient	Dilution Rate Per Gallon of Final Spray
ants, centipedes, clothes moths, cockroaches (maintenance rate), crickets, earwigs, flies, firebrats, gnats, midges, fleas (contact), millipedes, mosquitoes, silverfish, spiders	.03% w/w	1 Scoop*
bees, carpet beetles, cockroaches (clean out rate), fleas, hornets, killer bees, pillbugs, scorpions, sowbugs, ticks, yellow jackets, wasps	.06% w/w	2 Scoops
termites (Formosan & Eastern subterranean-localized control only)	.06% w/w	2 Scoops
fire ants, carpenter ants (localized control only)	.06% w/w	2 Scoops

*1 scoop = 0.1 ounce of Saga WP = 1 level teaspoon.

GENERAL PEST CONTROL INDOORS

Treat specific areas that insects inhabit or where they are frequently found. Mix 1 scoop (0.1 ounce) of Saga WP in one gallon of water and apply to adequately cover 1000 square feet. Do not allow dripping or run-off to occur. Under conditions of severe pest infestation, when quick knockdown and/or longer residual control is desired, mix 2 scoops (0.2 ounce) of Saga WP in one gallon of water and apply to adequately cover 1000 square feet. Do not allow dripping or run-off to occur. To insure consistent acceptable control of the target pest, proper sanitation and prevention of reinfestation are recommended.

PREMISE PEST CONTROL: *Cockroaches, Ants, Crickets, Silverfish, Firebrats, Centipedes, Millipedes, Clothes Moths, Earwigs, Pillbugs, Sowbugs, Scorpions And Spiders:* Apply as a coarse, low pressure spot or crack and crevice spray to areas that these pests normally inhabit. Pay particular attention to dark corners of rooms and closets; floor drains; cracks and crevices in walls; along and behind baseboards; beneath and behind sinks, stoves, refrigerators, and cabinets; around plumbing and other utility installations, doors, windows and in attics and crawl spaces. Applications may be made to floor surfaces along baseboards and around air ducts.

PANTRY PEST CONTROL: To kill adult and accessible stages of insect pests such as *Lesser Grain Borers, Grain Weevils, Flour Beetles, Saw-toothed Grain Beetles, Cigarette Beetles, Merchant Grain Beetles, Angoumois Grain Moths, Mediterranean Flour Moths, Indian Meal Moths, Grain Mites And Spider Mites.*

Make application to cupboards, shelving and storage areas. Remove all food stuffs, all utensils, shelf paper and other objects before spraying. Allow all treated surfaces to dry and cover shelves with clean paper prior to replacing food stuffs, utensils or other items. Any food stuff accidentally contaminated with any spray solution should be discarded.

ANTS (including Pharaoh Ants): Apply to trails, around doors and windows and other areas where ants inhabit or enter premises.

FLEAS: A total management program is recommended. It is suggested that infested areas be thoroughly vacuumed prior to treatment. These areas include all carpet, upholstered furniture, baseboards and other indoor areas frequented by pets. The vacuum cleaner bag should be discarded in an outdoor trash container. Pet bedding should be cleaned or replaced.

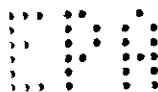
Apply Saga WP to rugs, carpets, upholstered furniture, pet beds, floor coverings, pet resting areas and other infested habitats. The quantity of finished spray required is dependent upon carpet/fabric density. Provide uniform coverage, apply until infested area is moist.

Effective **Flea** control includes controlling the source of flea infestations. This can require treatment of pets with an EPA approved product registered for such use and treating outside areas frequented by pets. Saga WP can also be applied out-of-doors for flea control. Do not treat pets with this product. Do not allow pets to contact treated areas until spray has dried. Remove animal and feed before spraying.

TICKS (INCLUDING LYME DISEASE VECTORS): Thoroughly apply Saga WP to infested areas, such as pet beds and resting quarters; nearby cracks and crevices; along baseboards, windows and door frames, where these pests may be present. For best results, old bedding should be replaced with clean bedding after treatment. Do not treat pets with this product. Do not allow pets to contact treated areas until spray has dried. Remove animals and feed before spraying. Saga WP can also be applied out-of-doors for tick control.

TERMITES, CARPENTER ANTS AND CARPENTER BEES: (For localized control only). Apply spray dilution to voids or channels in damaged wooden members of a structure, or to cracks, spaces or bearing joints between wooden members of a structure or between such members and the foundations, in locations vulnerable to attack such as crawl spaces. Drilling may be necessary prior to applying Saga WP to voids, cracks or joint spaces in vulnerable locations and to channeled sections of wood but it must be recognized that such drilling and treating of a timber in place may not result in complete coverage of infested and vulnerable voids or galleries. All treatment holes drilled in construction elements in commonly occupied areas of structures

SAGA® WP



must be securely plugged. Inspect at 6 months and 1 year to insure that the colony has been killed. Retreat if needed. The purpose of such applications of Saga WP is to kill workers or winged reproductive 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 are merely a supplement.

Do not apply solution until location of heat or air conditioning ducts, vents, water and sewer lines and electrical conduits are known and identified. When located, applications may be made around these structures. However, caution must be taken to avoid contamination of these structural elements and airways.

AIRCRAFT PEST CONTROL: Do not use in aircraft cabins. Apply to cracks, crevices, and other surfaces where the labeled pests have been seen or may have harborage. Allow spray to dry before re-entry.

Note: Do not permit adults, children or pets to contact treated surfaces until spray has dried completely. Do not apply this product in patient rooms or in any rooms while occupied by the elderly or infirm. Do not apply to classrooms when occupied by students. Do not use as a space spray. Use in ventilated areas. Do not apply where electrical short circuits could occur. Use a dust or a dry bait in these areas.

FOOD/FEED HANDLING ESTABLISHMENTS

For control of all labeled pests, applications are permitted in food/feed and non-food/non-feed areas of food/feed handling and processing 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/feed. Serving areas where food/feed is exposed and the facility is in operation are also considered food/feed areas.

NOTE: Containers larger than one pound may not be marketed or stored in food handling establishments.

NON-FOOD/FEED AREAS

Examples of nonfood/nonfeed 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). All areas that insects inhabit or through which insects may enter should be treated.

USDA INSPECTED FACILITIES: Saga WP is authorized by USDA for use in federally inspected meat and poultry plants. 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. Saga WP is classified as an F2 residual insecticide according to regulations listed under Section 5.6(A)(1)(b) of the USDA Food Safety and Inspection Service Handbook. Refer to List of Proprietary Substances and Nonfood Compounds for authorized listing.

GENERAL SURFACE APPLICATION: Do not use this application method in the food/feed handling areas of the facility when the facility is in operation or foods are exposed. Do not apply directly to food/feed products. Cover or remove all food/feed processing and/or handling equipment during application. After application

in food/feed processing plants, cafeterias and similar facilities, wash all equipment, benches, shelving and other surfaces which food/feed will contact. Clean food/feed handling or processing equipment and thoroughly rinse with clean, fresh water. After application in bakeries, clean all food/feed contact surfaces thoroughly with appropriate equipment.

SPOT, OR CRACK AND CREVICE APPLICATIONS: In USDA Inspected facilities, apply only when facility is not in operation. In non-USDA facilities, applications may be made while the facility is in operation provided exposed food/feed is covered or removed from area being treated prior to application. Do not apply directly to food/feed or food/feed-handling surfaces.

In the home, do not allow spray to contact food/feed surfaces, if it does, clean surfaces with soap and water.

GENERAL PEST CONTROL OUTDOORS

Use Saga WP to control outdoor pests by application as either a perimeter treatment or as a residual spray.

PERIMETER TREATMENTS: To help prevent infestation of buildings, apply Saga WP where pests are active and may find entrance. For example, treat a band of soil 6 to 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 at the rate of 1 scoop or 2 scoops of Saga WP in sufficient water to adequately cover 1000 square feet (consult dosage chart) thoroughly and uniformly wet the barrier area.

RESIDUAL SPRAY: To control *Ants, Cockroaches, Crickets, And Spiders* (contact kill), apply Saga WP as a coarse low pressure spray to surfaces of buildings, porches, screens, window frames, eaves, patios, lawns (residential only), refuse dumps and garages.

TO CONTROL Fire Ants apply as a mound drench at a rate of 2 scoops (0.2 ounce) per gallon of water. Sprinkle (watering can) one gallon diluted product over the surface of each mound up to 12 inches in diameter and two gallons for larger mounds. Thoroughly wet mound and surrounding area. If possible, applications should be made on a warm day after rainfall.

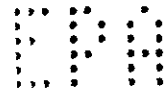
TO CONTROL Fleas And Ticks (including Lyme Disease Vectors, Ticks-contact Kill) apply Saga WP as a coarse wet spray to areas where fleas and ticks are most likely to be found, such as, but not limited to, dog houses, kennels, runways, cracks and crevices in sidewalks, paths or patios, under plants, shrubs, trees, or other shaded, moist areas where pests may rest.

WASPS, HORNETS, YELLOW JACKETS AND BEES: Application should be made late in the evening when insects are at rest. Aim spray at nest openings in ground, bushes, in cracks and crevices and under attic rafters which may harbor nests. Saturate nests and contact as many insects as possible.

FLIES, MIDGES, GNATS, AND MOSQUITOES: (for use as an aid in reducing annoyance from these insects) Spray outside surfaces of doors, screens, window frames, or wherever these insects may enter the room. Also, spray surfaces around light fixtures, on porches, in garages and other places where these insects alight or congregate.

CARPENTER ANTS: To control inside trees, utility poles, fencing and decking materials and similar structural members, drill to find the interior infested cavity and inject 0.06% dilution using appropriate treatment tool with splashback guard. Retreat as necessary. To control tunneling *Carpenter Ants* in soil, apply 0.06% dilution as a drench or inject at intervals of 8 to 12 inches, using 1 quart per linear foot. Establish a uniform barrier at the edge of walls, driveways, or other hard surfaces where ants are tunneling beneath the surfaces. To protect firewood from carpenter ants and termites, treat soil beneath firewood prior to stacking

SAGA® WP



with a 0.06% dilution at 1 gallon per 8 square feet to prevent infestation.

ORNAMENTAL PESTS: To control *Armyworms, Bagworms, Cankerworms, Cutworms, Elm Leaf Beetles, Flea Beetles, Grasshoppers, Gypsy Moth Larvae, Adult Japanese And June Beetles, Lacebugs, Leafhoppers, Leafrollers, Leaf Skeletonizers, Loopers, Oakworms, Plant Bugs, Pine Moths, Sawfly Larvae, Spanworms, Stinkbugs, Tent Caterpillars, Ticks, Treehoppers, Webworms.*

Use Saga WP at 1 scoop per 20 gallons of water (plus spreader/sticker) and spray foliage to run-off.

Not For Use In Commercial Greenhouses Or Nurseries

LAWN AND GROUNDS PESTS: To control *Ants Armyworms, Chinchbugs, Crickets, Cutworms, Sod Webworms, Fleas and Ticks.*

Use Saga WP at 1 scoop per 5 gallons of water and spray at 4 gallons per 1000 square feet.

Not for use on sod farms, grass grown for seed or on golf course turf.

TANK MIXING (INDOORS AND OUTDOORS)
GENERAL: Saga WP can be tank mixed with pesticides currently registered for similar use patterns, unless the companion product label specifically prohibits such mixing. Tank-mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label application rates may be exceeded. Prior to tank-mixing, a small jar compatibility test should be conducted using the proper proportions of chemicals and water to ensure the physical compatibility of the mixture. When tank-mixing with Saga WP, first add the Saga to the diluent and agitate to thoroughly suspend it in solution, then add the prescribed amount of companion product.

In combination with KICKER:

For enhanced flushing and knockdown of *Cockroaches*, tank mix at the rate of 1/4 to 1/2 ounce (equivalent to 1/2 to 1 tablespoon or 7.4 to 14.8 ml) of Kicker per gallon of finished spray and apply as directed above.

For improved control of pyrethroid resistant *German Cockroaches*, tank mix at the rate of 2 to 4 ounces of Kicker per gallon and apply as directed above.

For knockdown of *Adult Fleas*, tank mix at the rate of 0.5 to 1 ounce of Kicker per gallon and apply as directed above.

IN COMBINATION WITH INSECT GROWTH REGULATORS (IGR'S): To extend control of immature stages of *Cockroaches* and *Fleas*, tank mix the recommended rate of Saga WP with the correct amount of IGR per finished gallon. Follow all directions for use patterns and spray intervals from the IGR label to achieve maximum benefit.

Thoroughly wash out sprayer and screen with detergent and warm water before and after use. Do not mix this product with oil. Do not apply this product to edible crops.

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

AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

PRODUCT OF FRANCE