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Mr. Michael G. Sarli
Whitmire Research Laboratories, Inc.
3568 Tree Court Industrial Boulevard
St. Louis, MO 63122

Subject: Additional Claims - Alternate Formulas
Whitmire PT 170A X-Cludo™
EPA Registration No. 499-235
Your Submissions Dated January 8, April 13, and
December 21, 1987, and June 23, 1988 and July 25, 1990

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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Because of the potential for skin sensitization, delete all claims for use as a personal repellent, including the following:

References to treating garments and mattresses (lice control)
Spray under and around edges of sleeping bags or other bedding (campgrounds)
Labeling section beginning-To repel ticks, chiggers

2. Add - Contains sodium nitrite as a substatement to the ingredient statement.

62472:I:Mountfort:L10-1:KEVRIC:03/12/91:tk:dd

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

The alternate formulas submitted on the above dates are acceptable under this registration. Have your suppliers of CPL fragrance and Forest Fresh Fragrance submit their complete compositions to us, referencing this pesticide by product name and registration number.

Sincerely yours,



Richard F. Mountfort
Product Manager (10)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

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Front Panel:

7/25/90

WHITMIRE
PT® 170A X-Clude™
Microencapsulated Time Release
Pyrethrum

Aerosol
For Fogging or
Crack & Crevice

Kills and Repels: Angoumois Grain Moths, Ants, Bees, Beetles, Cadelles, Centipedes, Chiggers, Cigarette Beetles, Clothes Moths, Cockroaches, Confused Flour Beetles, Crickets, Dermestid Beetles, Dried Fruit Beetles, Drugstore Beetles, Firebrats, Fleas, Flies, Gnats, Grain Mites, Granary Weevils, Indian Meal Moths, Lice and eggs (on clothing, bedding and furniture), Mealworms, Mediterranean Flour Moths, Mosquitoes, Moths, No-see-ums, Red Flour Beetles, Rice Weevils, Saw-toothed Grain Beetles, Silverfish, Spiders, Stable Flies, Ticks, Trogaderma, Wasps, Waterbugs, Weevils and Yellow Jackets.

For Use In: Airplanes, Bakeries, Beverage Plants, Boats, Cabins, Campers, Campgrounds, Canneries, Dairies, Flour Mills, Food Processing Plants, Food Storage Areas, Grain Mills, Homes, Hospitals, Hotels, Industrial Installations, Kennels, Meat Packing Plants, Motels, Nursing Homes, Office Buildings, Patios, Picnic Areas, Railroad Cars, Recreational Vehicles, Residences, Restaurants, Schools, Ships, Supermarkets, Tents, Trailers, Truck Trailers, Warehouses and Zoos.

Active Ingredients:

Pyrethrins	0.300Z
*Piperonyl Butoxide, Technical	2.200Z
N-Octyl Bicycloheptene Dicarboximide	0.336Z

Inert Ingredients 97.164Z

*Equivalent to 1.76% (butylcarbityl) Ether and 0.44% of related compounds.

ACCEPTED
In EPA Letter Dated
MAR 18 1991
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
499-235

EPA Reg. No. 499-235
EPA Est. No. 499-MO-1

KEEP OUT OF REACH OF CHILDREN
CAUTION

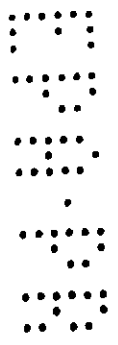
STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.
IF IN EYES: Immediately flush eyes with plenty of water. Get medical attention if irritation persists.
IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.
IF INHALED: Remove patient to fresh air. Apply artificial respiration if indicated.

SEE SIDE PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS

Net Weight: 16 oz.

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PT® 170A X-Clude™

SHAKE WELL BEFORE USING

DIRECTIONS FOR USE

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if absorbed through skin or inhaled. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of food, utensils and food preparation areas. Food should be removed or covered before treatment. Do not use on hair. Consult your pharmacist for treatment of lice infestations on humans. All food contact surfaces and cooking utensils should be covered during treatment or thoroughly cleaned before using. Remove pets and birds and cover aquariums before using. Wash thoroughly after using and before smoking or eating.

NOTICE TO APPLICATOR: When subject to extended inhalation exposure wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provision of CFR Part 11.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and birds. Do not apply directly to water. Keep out of lakes, streams and ponds. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS: Extremely flammable. Contents under pressure. Do not puncture or incinerate. Do not use or store near open flame. Exposure to temperatures above 130°F may cause bursting. Do not store below 32°F.

Do not spray where electrical short circuits might result, such as wall outlets, conduits, motors, switches, etc. Do not spray directly into any electronic equipment such as radios, televisions, computers, telephones, etc.

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

HOW TO USE WHITMIRE CRACK AND CREVICE
INJECTION SYSTEM

Whitmire PT® 170A may be used with injection tube for injecting into cracks and crevices where insects may be hiding, living and breeding. Place injection tip 1/2" into cracks, crevices, holes and other small openings where insects may be a problem. Release approximately one-second spray per spot. In serious infestation, if possible, place spots approximately 12' apart. In light infestation or preventative treatment place spots approximately three feet apart. In long running cracks, move the injector tip along the crack while spraying. Move at the rate of one linear foot per second in heavy infestations and three feet per second in light infestations. See the additional directions below for effective control of specified insects.

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Side Panel (cont.)

Cockroaches, Spiders, Waterbugs, Silverfish, Crickets, Firebrats: Make spot treatment and/or crack and crevice injections into hiding places such as cracks and crevices, moist areas, openings around pipes and sinks, under refrigerators, coffee makers, meter boxes and manholes. Direct spray on floors, walls, under pallets, behind shelves and drawers. Spray directly on insects in these locations where possible. Repeat as necessary.

Ants: Spray into trails, nests and points of entry around doors, book cases and storage areas. Spray directly on insects in these locations where possible.

Carpet Beetles: Make spray applications on and under edge of floor coverings, under carpets and furniture and in closets or other localities where these insects are found. Entire carpets may be treated. When treating entire carpets see directions under Fleas and Ticks. Repeat application as necessary.

Stored Product Pests: Make spot and/or crack and crevice treatment to localized areas including shelves, cupboards, walls and floors where food products suspected of being infested are stored. Food should be removed or covered during treatment. This treatment is supplemental to good housekeeping, since it will have no effect on insects breeding within packaging. Infested food packaging should be destroyed.

Flying Insects - Flies, Moths, Gnats: Close all windows and doors and direct fog upward at a rate of 5 to 8 seconds per 1,000 cubic feet. Disperse in all locations. Keep area closed for at least 15 minutes. Do not remain in treated area. Repeat application as is necessary.

FOOD AREAS: Do not apply directly to food. In commercial food handling facilities, cover or remove any food and food processing equipment during application. When using this product as a space spray in food areas, do not apply while food processing is under way. Except in federally inspected meat and poultry plants, careful crack and crevice application for inspection purposes is permissible at all times. After space spraying in meat packing plants, bakeries, and other food processing plants, wash with potable water all equipment, benches, shelves, etc., where exposed food will be handled. All food processing surfaces should be covered during treatment or thoroughly washed before use.

Lice and Eggs Not For Use on Humans or Animals For Lice Control: Spray on an inconspicuous area to test for possible staining or discoloration. Inspect after drying, then spray entire area to be treated. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 18 inches. Spray at the rate of 1 second of spray per each square foot. Thoroughly spray all garments, mattresses, furniture or similar objects that cannot be laundered or dry cleaned. Do not use article until spray is dry. Repeat treatment as necessary.

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OUTDOOR PESTS

Flying Insects: Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages, and other places where insects light or congregate. Repeat as necessary.

Treat normal fly resting areas such as ceilings, upper corners of the area, around windows and doors, light fixtures and other surfaces known to attract flies. Hold can one to two feet from target surface and apply at the rate of one 16 oz. can per 200-300 square feet of surface area.

Spray so as to lightly moisten the target surface. For best results begin treatments at the start of the fly season and repeat weekly during periods of heavy fly activity.

Ants, Crickets: For treatment of localized infestations of these insects in outdoor areas where there are weeds or brushy non-crop areas, spray infested areas thoroughly. For ants, thoroughly wet hills and runways. Repeat applications as infestation warrant and as reinfestations occur.

Fleas and Ticks: Apply PT® 170A to pet beds and resting quarters, adjacent cracks and crevices, baseboards, carpets and floor coverings, between and under cushions of upholstered furniture and other areas where pests may be present. Entire carpets may be treated. Thoroughly vacuum infected area to capture as many adult fleas as possible. Tightly seal vacuum bag and dispose. Applications to most surfaces should be as light as possible, approximately one 16 oz. can per 330 sq. ft. It may be necessary to use a higher volume of spray, approximately one 16 oz. can per 200 sq. ft., on long, dense shag carpets. Old bedding of pets should be replaced with clean, fresh bedding after treatment. Animals should not be sprayed with this product.

Campgrounds, Patios and Picnic Areas For control of outdoor pests. Spray in the direction of a slight breeze away from user that allows the fog to drift into areas of infestation. Spray while moving away from the treated areas. Allow spray to dissipate before occupying the treated area. Direct spray from a distance of 4 to 6 feet from flowering plants, shrubbery and grass where the insects may be resting. Avoid heavy wettage of foliage.

Spray on and around benches, blankets, chairs, garbage cans, patio furniture and tables.

Spray under and around edges of sleeping bags or other bedding.

Boats, Campers, Tents, Trailers and Recreational Vehicles - Spray into area for 1 to 3 seconds. Leave area unoccupied for 15 minutes.

Cabins - Close all windows and doors and direct fog upward at a rate of 2 to 4 seconds per 1,000 cubic feet. Disperse in all locations. Keep area closed for at least 15 minutes. Do not remain in treated areas.

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side Panel (cont.):

To repel ticks, chiggers, biting flies, gnats, mosquitoes, fleas, no-see-ums: To treat, hold can 8 to 12 inches from body and uniformly spray all clothing and exposed skin except for face. For chiggers, ticks and fleas pay particular attention to pant cuffs, socks, foot coverings and around openings in outer clothing. Spray lightly, saturation is unnecessary. To treat face spray palm of hand and spread on face and neck. Avoid contact with eyes and lips.

STORAGE AND DISPOSAL:

Storage: Store in a cool dry place away from heat or open flame and inaccessible to children. Do not store below 32°F.

Container Disposal: Do not reuse empty container. Do not puncture or incinerate. Replace cap and discard in trash.

Pesticide Disposal: Securely wrap container in several layers of newspaper and discard in trash.

Manufactured by:
Whitmire Research Laboratories, Inc.
St. Louis, Missouri 63122

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