

499-239 (

9/17/2002

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United States Environmental Protection Agency

SEP 17 2002

Ms. Dana M. Thomas Manager, Product Registrations
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122-6682

Subject: Submission of an amendment for the revision of the First Aid statements per PR
Notice 2001-1 and additional formatting revisions.

Product Name: Whitmire X-clude PT 1600A
Registration No: 499-239
Date of Application: June 14, 2002
OPP Identifier No.: 284244
OPP Sub No.: S617675

Dear Ms. Thomas;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below.

1. Any precautions and restrictions that apply to specific site(s) and or pest(s), should be included in the directions specific to that combination. Therefore, the block identifying phytotoxicity discussions should be moved to the DIRECTIONS FOR USE and placed under the subtitle "ORNAMENTALS". The title of this block must be changed to "Phytotoxicity Information", and the statement "... such as crop injury..." must be changed to "... such as plant injury...", because this product is not used on any crops.
2. The statement "DO NOT USE ON: Cyclamen and Nasturtium." should be moved to a new subsection entitled "USE RESTRICTIONS", placed directly below the Directions for Use subsection entitled "ORNAMENTALS".
3. The section entitled "SPECIAL NOTICE" contains several different issues that should be separated and identified in other locations as follows:
 - a. Directly below the subsection entitled "INDOORS- Hobby Greenhouses, Homes interior landscapes" insert a new subtitle "General Use Precautions" and insert the statement "Do not use Whitmire X-clude® in greenhouses with unvented or defective gas heating systems or when open combustion exists." If this statement is applicable for homes, and other interior landscape situations, the words "in greenhouses" should be removed.

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGEBKEN							
DATE ▶	Sep 18, 2002							

b. The statement "Contents of container must be at room temperature before... for 24 hours before application." should be placed directly above the subtitle "ORNAMENTALS", so that it will apply for all uses.

4. Remove all statements "but not limited to". This is an open ended use pattern statement, and may lead to misuse or product usage confusion. If you intend to include more uses, they must be specifically listed. This statement exists in the subtitle "FOR USE INDOORS AND OUTDOORS ON, BUT NOT LIMITED TO:" This section should also be moved below the subtitle "ORNAMENTALS", instead of below each use site.

5. Move the storage and disposal instructions appear at the end of the Direction for Use section. This placement eliminates the break between the heading "Directions for Use" and the body of the use directions.

6. Move "SHAKE WELL BEFORE USING" and "SPRAYS IN ANY POSITION" to the directions for use.

7. Your letter of explanation lists that this product is intended for "Commercial Use", and such products are categorized (For purposes of PPE requirements) by the Agency as Non-WPS/Residential Products. Non-WPS products placed in dermal toxicity, inhalation toxicity and primary eye irritation category III, and in primary dermal irritation categories II and III. Such products should have PPE statements according to the following table:

- Personal Protective Equipment Non-WPS Products

Route of Exposure	Toxicity Category by Route of Exposure of End-Use Product ¹			
	I DANGER	II WARNING	III CAUTION	IV CAUTION
Dermal Toxicity or Skin Irritation	Coveralls worn over long-sleeved shirt and long pants	Long-sleeved shirt and long pants	Long-sleeved shirt and long pants	No minimum ⁴
	Socks	Socks	Socks	No minimum ⁴
	Chemical-resistant footwear	Chemical-resistant footwear	Shoes	No minimum ⁴
	Gloves ²	Gloves ²	Gloves ²	No minimum ⁴
Inhalation Toxicity	Respiratory protection device ³	Respiratory protection device ³	No minimum ⁴	No minimum ⁴
Eye Irritation	Protective Eyewear	Protective Eyewear	No minimum ⁴	No minimum ⁴

¹If dermal toxicity and skin irritation categories are different, PPE shall be determined by the more severe toxicity category of the two.
²Refer to Table 12 to determine the specific type of chemical-resistant glove.
³Review paragraph 6c, Table 10, below to determine the appropriate respirator to be used.
⁴Although no minimum PPE is required for these toxicity categories and routes of exposure, the Agency may require PPE on a product-specific basis.

Applicable PPE statements for Category III Acute Dermal Tox would be as follows:

“ Personal Protective Equipment (PPE)

Applicators and handlers must wear;

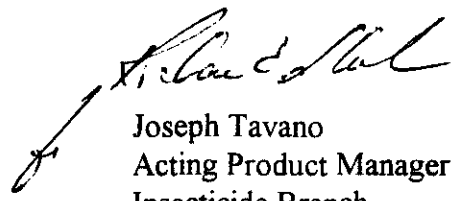
- Long sleeved shirt and long pants
- Shoes plus socks
- Chemical Resistant gloves (such as rubber or waterproof)

Follow manufacturer’s instruction for cleaning/maintaining PPE. If no such instructions for Washables exist, use detergent and hot water. Keep and wash PPE separately from other Laundry.

User Safety Recommendations:
 User should wash hands before eating drinking, chewing gum, using tobacco, or using the toilet. User should remove clothing/PPE immediately, if pesticide gets inside. Then wash thoroughly and put on clean clothing.
 User should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

A general label layout is attached for reference purposes, and an Agency Non-Restricted Use Sample Label is also enclosed for reference when reformatting the above referenced label. **Five copies of the finished labeling must be submitted prior to releasing the product for shipment.** If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



Joseph Tavano
 Acting Product Manager 10
 Insecticide Branch
 Registration Division (7505C)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION:

Avoid breathing spray mist.aquariums before using.

“ Personal Protective Equipment (PPE)

Applicators and handlers must wear;

-Long sleeved shirt and long pants

-Shoes plus socks

-Chemical Resistant gloves (such as rubber or waterproof)

Follow manufacturer’s instruction for cleaning/maintaining PPE. If no such instructions for Washables exist, use detergent and hot water. Keep and wash PPE separately from other Laundry.

User Safety Recommendations:

User should wash hands before eating drinking, chewing gum, using tobacco, or using the toilet. User should remove clothing/PPE immediately, if pesticide gets inside. Then wash thoroughly and put on clean clothing.

User should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to.... equipment or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not..... televisions, computers, telephones, etc.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW... WITH ITS LABELING.

GENERAL INSTRUCTIONS AND INFORMATION

SHAKE CAN WELL BEFORE USING

SPRAYS IN ANY POSITION

Contents of container must be at room temperature before.... for 24 hours before application.

ORNAMENTALS - For use indoors and outdoors on African violets, Agapanthus, Ageratum, Wandering Jew, Wax Plant and Zinnia.

USE RESTRICTIONS Do not use on Cyclamen and Nasturtium.

PHYTOTOXICITY INFORMATION:

This product has been tested on a wide variety of plants and in our opinion... such as plant injury or ineffectiveness..... petal damage may occur.

INDOORS- Hobby Greenhouses, Homes Interior Landscapes:

Use Precautions for Hobby Greenhouses : Do not use Whitmire X-clude® in hobby greenhouses with unvented or defective gas heating systems or when open combustion exists.

“For light infestations..... inches away from foliage.”

SPOT TREATMENT -

OUTDOORS - Landscapes....

RESIDENTIAL -INDOOR PESTS

Cockroaches, Spiders, Silverfish, Crickets, Firebrats:

Ants:

Flying insects - Flies, Moths, Gnats:

RESIDENTIAL - OUTDOOR PESTS

Flies:

Ants, Crickets:

STORAGE AND DISPOSAL

...
...
...
...

PRODUCT NAME

Product information: (what is product used for)

KEEP OUT OF REACH OF CHILDREN

SIGNAL WORD

First Aid ¹	
If Swallowed	_____
If Inhaled	_____
If on Skin	_____
If in Eyes	_____
Reminder to have label. Emergency phone number.	
Note to Physician: ²	_____

SEE OTHER PANEL FOR PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT(S): 90.00%
 OTHER INGREDIENTS: ³ 10.00%
 TOTAL: 100.00%

This product contains ____ lbs of [a.i.] per gallon.

EPA Registration No.
 EPA Establishment No.

[Registrant Name]
 [Address]
 [Telephone Number]

Net Contents _____

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

PPE _____

ENVIRONMENTAL HAZARDS

PHYSICAL OR CHEMICAL HAZARDS

DIRECTIONS FOR USE

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

GENERAL INSTRUCTIONS AND INFORMATION

Chemigation Instructions or Prohibition (if required): ⁴

SPRAY DRIFT LABELING (if applicable) :

DIRECTIONS for USE (continued)

Crop/Site/Pest: _____

Crop/Site/Pest: _____

Crop/Site/Pest: _____

Crop/Site/Pest: _____

Crop/Site/Pest: _____

Crop/Site/Pest: _____

Crop/Site/Pest: _____

Crop/Site/Pest: _____

Crop/Site/Pest: _____

STORAGE AND DISPOSAL

PESTICIDE STORAGE _____

PESTICIDE DISPOSAL _____

CONTAINER DISPOSAL _____

WARRANTY STATEMENT

1. When First Aid statements appear on the front panel they should be grouped together with the other precautionary statements, preferably appearing first, immediately following the general heading "Precautionary Statements". This is required on labels of all pesticides falling into Tox. Cat. I on the basis of oral, inhalation and dermal toxicity.
 2. If required content of the Note to Physician is determined, in part, by the Acute Toxicity Review.
 3. A complete listing of inert ingredients may be provided below the ingredient statement.
 4. Required except for products intended solely for residential use; direct injection into plants; post harvest application, or application only as a gas or solid (e.g., pellet, tablet, granule, or dust formulations).

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7 8 7

gonia, Bird's Nest Fern, Blue Spruce, Boston Fern, Bottlebrush, Cactus, Calendula, Camellia, Carnation, Celosia, Chrysanthemum, Cockscomb, Coleus, Cotoneaster, Grape Myrtle, Croton, Dahlia, Daisy, Dianthus, Dogwood, Dusty Miller, Dwarf Lilac, Escalonia, Eustoma, Flat Topped Sedum, Floss Flower, Friendship Plant, Gardenia, Gazania, Geranium, Golddust, Honeysuckle, Hydrangea, Ilex, Impatiens, Ivy, Jade Plant (Crassula), Japanese Aralia, Juniper, Leucothoe, Lilac, Malus, Maranta, Marigold, Mock Orange, Mugo Pine, Nandina, Oleander, Orchid, Ornamental Evergreens, Osmanthus, Pachysandra, Periwinkle, Petunia, Pfitzer Juniper, Photinia, Pineapple Guava, Pittosporum, Podocarpus, Primrose, Privet, Pyracantha, Raphiolepis, Rhododendron, Rose, Salvia, Sansevieria, Scarlet Sage, Snake Plant, Snapdragon, Soft Maple, Spider Plant, Star Jasmine, Strawflower, Swedish Ivy, Sweet Pea, Tahitian Bridal Veil, Velvet Plant (Gynura), Verbena, Wandering Jew, Wax Plant and Zinnia.

DO NOT USE ON: Cyclamen and Nasturtium.

RESIDENTIAL - INDOOR PESTS

Cockroaches, Spiders, Silverfish, Crickets, Firebrats: Make spot treatment. 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 and storage areas. Spray directly on insects in these locations where possible.

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 necessary.

RESIDENTIAL-OUTDOOR PESTS

Flies: 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.

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

PLANT SAFETY INFORMATION

This product has been tested on a wide variety of plants and in our opinion has demonstrated excellent plant safety. However, not all varieties or strains of the plants listed have been tested. Unintentional consequences such as crop injury or ineffectiveness may result because of certain environmental or growing conditions, manner of use or application, and insect resistance. Therefore, before treating a large number of plants, spray a few plants and observe for plant damage and for performance prior to full scale application. Plants in bloom should not be treated since petal damage may occur.

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.



A Prescription Treatment® Brand Insecticide from:
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122-6682
www.wrmg.com

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Whitmire

X-clude®

PT® 1600A

[ALTERNATE BRAND NAME: PRESCRIPTION TREATMENT® brand 1600 X-clude® Timed Release Pyrethrum]

FOR USE INDOORS AND OUTDOORS: Hobby Greenhouses, Homes, Interiorscapes and Landscapes.

MAY BE USED ON: Potted and Flowering Plants, Foliage, Bedding Plants, Cut Flowers and Ornamentals.

KILLS AND REPELS: Ants, Aphids, Beetles (Aster Beetles, Blister Beetles, Cigarette Beetles, Colorado Potato Beetles, Cucumber Beetles, Drugstore Beetles, Flea Beetles, Japanese Beetles, Rose Chafers, Trogaderma, Watermelon Beetles, Weevils) Caterpillars (Cabbage Worms, Rose Slugs, Hornworms) Centipedes, Cockroaches, Crickets, Flies, Fungus Gnats, Gnats, House Flies, Leafhoppers, Mealy Bugs, Moths, Rose Aphids, Scale, Spider Mites, Spiders, Stable Flies, Stink Bugs, Tarnished Plant Bugs and Whiteflies.

ACTIVE INGREDIENTS:

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

OTHER INGREDIENTS:

.....	97.164%
* Equivalent to 1.76% (butylcarbitol)(6-Propylpiperonyl) Ether and 0.44% of related compounds.	
TOTAL:	100.000%

EPA Reg. No. 499-239 EPA Est. No. 499-MO-1
KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

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. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

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 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 treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-225-3320 for emergency medical treatment information.

See side panel for additional Precautionary Statements

NET WEIGHT: 1 lb., 4 oz. (20 oz.)



WHITMIRE MICRO-GEN
RESEARCH LABORATORIES INC.
800-777-8570

ACCEPTED
with COMMENTS
In EPA Letter Dated:
SEP 17 2002
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
499-239

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Avoid breathing spray mist. Avoid contact with eyes, skin or clothing. In case of contact flush eyes or skin with water. Wash thoroughly after using and before smoking or eating. Avoid contamination of food, utensils and food preparation areas. Food should be removed or covered before treatment. All food contacting surfaces and cooking utensils should be covered during treatment or thoroughly cleaned before use. Remove pets and birds and cover aquariums before using.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and birds. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

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.

SHAKE WELL BEFORE USING.
SPRAYS IN ANY POSITION.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

SPECIAL NOTICE: Do not use Whitmire X-clude® in greenhouses with unvented or defective gas heating systems or when open combustion exists.

Contents of container must be at room temperature before use. Therefore, cans must be stored at room temperature (above 65°F) for 24 hours before application.

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.

PESTICIDE DISPOSAL: Securely wrap container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label (DO NOT PUNCTURE!). If recycling is not available, wrap the container and discard in the trash.

ORNAMENTALS

INDOORS - Hobby Greenhouses, Homes, Interiorscapes: For light infestations treat at five seconds per 100 square feet. For heavy infestations treat at ten seconds per 100 square feet. Dosage based on 2 foot high plants. Lower or higher dosage should be given based on height of foliage. Move can in a fast sweeping motion to provide maximum coverage maintaining a distance of 18 to 24 inches away from foliage.

SPOT TREATMENT - For Individual plants and localized infestations: Spray light mist on upper and lower leaf surfaces at a distance of 18-24 inches away from foliage. Avoid wetting foliage with spray. Repeat application as necessary.

OUTDOORS - Landscapes, Ornamental plants, Shrubs: For best results, spray when air is still. Use slow sweeping motion, holding the can 18-24 inches from plant. Avoid wetting foliage with spray. Spray rows at the rate of one foot per second. For heavy growth spray on both sides. Repeat when necessary.

FOR USE INDOORS AND OUTDOORS ON, BUT NOT LIMITED TO: African Violets, Agapanthus, Ageratum, Aluminum Plant, Alyssum, Arrowhead, Aster, Azalea, Be-