

499-320

05-05-2004

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 5 2004

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

Subject: Label Amendment - Responding to Agency's September 16, 2003 letter
Whitmire PT 19
EPA Reg. No. 499-320
Your Submission Dated March 19, 2004

Dear Mr. Thomas:

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. Revise Precautionary Statement to read as follows:

"Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapors. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse."

2. Move "Do not contaminate water, food or foodstuffs with product." to the Directions for Use, Use Restrictions section.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in black ink, appearing to read "G. LaRocca".

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

TICKS (ADULTS AND LARVAE): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering with special attention to cracks and crevices around baseboards, and window and door frames. Infested upholstered furniture may also be treated with this product.

INDOOR AND OUTDOOR TREATMENTS
MUD DAUBER AND WASP NESTS: Spray mist directly on insects and their nests from approximately 2 ft. distance. Spray into hiding and breeding places contacting as many insects as possible. Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest.
KENNELS: For open construction (fences only), spray toward fly resting sites. Treatment should be performed at dusk when flies are at rest. For closed kennels (boarded or enclosed), close all doors and windows, turn off air conditioner, spray at rate of 1 to 2 seconds per 1,000 cubic feet. [ALTERNATE TEXT FOR 8 & 15 LB. UNITS: 1/2 to 1 second.]
CATTERIES: For open construction (fences only), spray toward fly resting sites. Treatment should be performed at dusk when flies are at rest. For closed catteries (boarded or enclosed), remove animals, close all doors and windows, turn off air conditioner, spray at rate of 1 to 2 seconds per 1,000 cubic feet. [ALTERNATE TEXT FOR 8 & 15 LB. UNITS: 1/2 to 1 second.] Ventilate area or structure thoroughly before returning animals.
TO CONTROL FLEAS, TICKS AND LICE ON DOGS: USE ONLY ON DOGS. Starting at the tail, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to insure penetrating the coat. Do not repeat treatment for 1 week. Do not use on dogs under 12 weeks old. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult your veterinarian immediately.

OUTDOOR TREATMENTS
 Remove all exposed food and cooking utensils. Cover all food handling or wash thoroughly after treatment and before use. Do not use on edible crops.

FLIES, GNATS AND MOSQUITOES (GROUND APPLICATION): Treat in open areas near building and in surroundings. Best results are obtained when wind speed is five (5) MPH or less. Apply at a rate of 60-80 seconds per acre. Spray in wide swaths across area to be treated. Allow spray drift to penetrate dense foliage.

USE IN AND AROUND LIVESTOCK HOUSING
 For control of Deer Flies, Face Flies, Fleas, Gnats, Horn Flies, House Flies, Lice, Mosquitoes, Small Flying Moths, Stable Flies, Ticks. Remove livestock before any space treatment.

DAIRY FARMS: SPACE TREATMENT OF MILKING PARLOR AND MILK ROOM: Cover milking utensils and milk to prevent contamination from spray and falling dead insects. Direct fog upward and in all directions at a rate of 1 to 3 seconds per 1,000 cu. ft. [ALTERNATE TEXT FOR 8 & 15 LB. SIZES: 1/2 to 1 1/2 seconds per 1,000 cu. ft.] **ON-ANIMAL USE:** From approximately 2 foot distance, thoroughly spray entire animal as it is being released to pasture. Spot treat withers, shoulders and back where saliva accumulates from head tossing. Use 2 to 4 seconds per animal. Do not spray directly toward animal's eyes. Do not spray sick animals.

STANCHION BARN: **ON-ANIMAL USE:** Walk behind animals and direct spray over backs allowing 1 second per animal. For most effective results, apply each morning.
BEEF CATTLE OPERATIONS: **SPACE TREATMENT:** In barns, close all windows and doors and spray at the rate of 1 to 2 seconds per 1,000 cu. ft. [ALTERNATE TEXT FOR 8 & 15 LB. SIZES: 1/2 to 1 second per 1,000 cu. ft.] If area cannot be closed, double the dosage. **ON-ANIMAL USE:** Thoroughly spray entire animal as it is being released to pasture. Use 2 to 4 seconds of spray per animal. Do not spray directly toward animal's face or eyes. Do not spray sick animals. Repeat application as necessary, but not more than once per day.

HORSE BARN AND STABLES: **SPACE TREATMENT:** Close all windows and doors and spray at the rate of 1 to 2 seconds per 1,000 cu. ft. [ALTERNATE TEXT FOR 8 & 15 LB. SIZES: 1/2 to 1 second per 1,000 cu. ft.] If area cannot be closed, double the dosage. **ON-ANIMAL USE:** Lightly mist over the backs of horses and ponies from a distance of at least two feet. Use 2 to 4 seconds of spray per animal. Do not spray directly toward animal's face or eyes. Do not spray sick animals. Repeat application as necessary, but not more than once per day.

POULTRY OPERATIONS: **SPACE TREATMENT:** Close all windows and doors and spray at the rate of 1 to 2 seconds per 1,000 cu. ft. [ALTERNATE TEXT FOR 8 & 15 LB. SIZES: 1/2 to 1 second per 1,000 cu. ft.] If area cannot be closed, double the dosage. Repeat application as necessary, but not more than once per day.

HOG OPERATIONS: **SPACE TREATMENT:** In hog houses, close all windows and doors and spray at the rate of 1 to 2 seconds per 1,000 cu. ft. [ALTERNATE TEXT FOR 8 & 15 LB. SIZES: 1/2 to 1 second per 1,000 cu. ft.] If area cannot be closed, double the dosage. **ON-ANIMAL USE:** Direct spray over backs and spray for 1 to 2 seconds per hog. [ALTERNATE TEXT FOR 8 & 15 LB. SIZES: 1/2 to 1 second per hog.] Do not spray directly toward animal's face or eyes. Do not spray on sick animals. Repeat application as necessary, but not more than once per day. Do not ship animals for slaughter within 5 days of last treatment.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.
STORAGE: Store in a cool area away from heat or open flame.
PESTICIDE DISPOSAL: Waste resulting from use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Do not puncture or incinerate! Empty container by using the product in accordance with the label directions. Offer empty container for recycling, if available, or place in trash if allowed by state and local regulations. If container is partly full, contact your local solid waste agency or call 1-800-CLEANUP for disposal instructions.

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

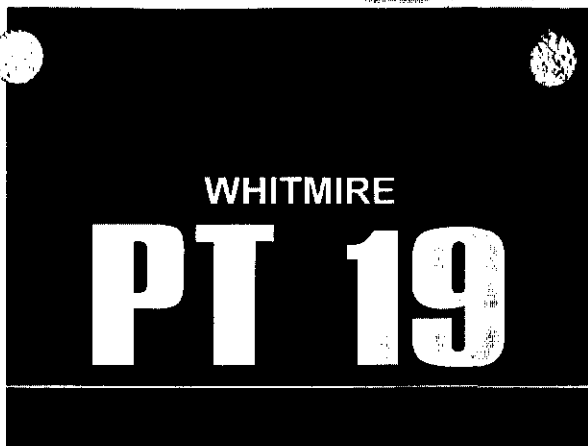


A PRESCRIPTION TREATMENT* brand insecticide from:
 Whitmire Micro-Gen Research Laboratories, Inc.
 3568 Tree Court Industrial Blvd
 St. Louis, MO 63122-5682
 www.wmrg.com
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PT 19 Container Label

303 (Rev. 10/03)



KILLS AND REPELS:

Anguonids Grain Moths, Ants, Bed Bugs, Booklice, Carpet Beetles, Centipedes, Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Drug Store Beetles, Fleas, Flies, Fruit Flies, Gnats, Grain Mites, Granary Weevils, Horn Flies, House Flies, Indian Meal Moths, Lice, Mediterranean Flour Moths, Millipedes, Mosquitoes, Mud Daubers, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Silverfish, Small Fly Moths, Sow Bugs, Spiders, Stable Flies, Ticks and Wasps.

FOR USE IN AND AROUND:

Beef Cattle Operations, Campgrounds, Catteries, Dairy Farms (Including Milk House, Milk Parlor, Loading Sheds, and Holding Lots), Hog Operations, Homes, Horse Barns and Stables, Kennels, Poultry Operations, Utilities, and the non-Food/Feed Areas of Food Storage Areas, Hospitals, Hotels, Motels, Resorts, Schools, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains, Trucks, Planes), Warehouses, and other Commercial and Industrial Buildings.

ACTIVE INGREDIENT:

Pyrethrins	0.25%
Permethrin*	0.25%
Piperonyl Butoxide, Technical**	2.00%

OTHER INGREDIENTS:

97.50%
 * (3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethyl) 2,2-dimethylcyclopropane carboxylate
 ** cis/trans ratio: Min. 35% (+/-) cis and max. 65% (+/-) trans.
 * Equivalent to 1.6% (Butylcarbitolyl)(6-Propylpiperonyl) Ether and 0.4% Related Compounds
TOTAL: 100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give ANY liquid to the person. Do not give anything by mouth to an unconscious person.

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 by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

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

NOTE TO PHYSICIAN: Contains petroleum distillate - vomiting may cause aspiration pneumonia.

See side panel for additional Precautionary Statements.

EPA Reg. No. 499-320 • EPA Est. No. 499-MO-1

NET WEIGHT:



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

ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 MAY 5 2004

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 499-320

READ ENTIRE LABEL BEFORE EACH USE.

WHEN TREATING PETS, USE ONLY ON DOGS. SEE "LIVESTOCK" SECTION FOR USE ON OTHER ANIMALS.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing of vapor. Wash thoroughly with soap and water after handling and before smoking or eating. Do not contaminate water, food, or foodstuffs with product.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Extremely Flammable. Contents Under Pressure. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

DIRECTIONS FOR USE

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

USE RESTRICTIONS

- Do not apply this product in occupied patient rooms or in any rooms while occupied by the elderly or infirm.
- Do not apply to classrooms when in use.
- Do not use in aircraft cabins.
- Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas where food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held. Non-food/feed areas are areas such as garbage rooms, incinerators, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).
- In the home, all food processing surfaces and utensils in the treatment area should be covered or removed.
- Do not spray on plastic, painted, or varnished surfaces.
- Due to the possibility of shock hazard, do not use this product in or on electrical equipment such as radios, televisions, computers, etc.
- Use only with the supplied actuator and injection tubes or other Whitmire Micro-Gen equipment.
- Do not remain in treated area during treatment, ventilate area after treatment is completed.
- Remove all pets and birds prior to treatment. Cover fish tanks or remove before spraying.
- Allow all treated surfaces and articles to dry thoroughly before use.
- Remove animals prior to treatment for indoor space treatments in livestock housing.

GENERAL USE DIRECTIONS

CRACK AND CREVICE* TREATMENT: Inject PT 19 into cracks and crevices or void space where insects may be harboring, living and breeding. Place injector tip 1/2" into cracks and crevices, holes and other small openings. Release approximately one-second spray per spot. For a serious infestation, place spots approximately 12" apart. For light infestation or for preventative treatment, place spots approximately three feet apart. In long running cracks, move injector tip along the crack while spraying at the rate of one linear foot per second. For heavy infestations move injector tip along at three linear feet per second.
SPACE TREATMENT: Open cabinets and closets in area to be treated. Shut off air conditioners, fans and close doors and windows before spraying. Calculate the cubic footage to be treated and apply at the prescribed rate for the pest(s) to be treated. Direct spray toward area suspected of harboring the greatest insect infestations. Disperse in all locations contacting as many insects as possible. Keep area closed for 15 minutes. Open and ventilate treated areas before re-occupying.
VOLUMETRIC TREATMENT FOR INACCESSIBLE CLOSED VOIDS (such as false ceilings, wall and equipment voids): Calculate the volume of the void (in cubic feet) and treat at the prescribed rate for the pest(s) to be treated. Several holes may be required in long-running voids.

INDOOR TREATMENTS

CLUSTER FLIES, FLIES, FRUIT FLIES, GNATS, MOSQUITOES, SMALL FLYING MOTHS: **SPACE TREATMENT:** Apply at a rate of 1 to 3 seconds per 1,000 cu. ft. Fill room with mist. Disperse in all locations.

ANTS, BOOKLICE, CENTIPEDES, CLOVER MITES, CRICKETS, MILLIPEDES, ROACHES, SILVERFISH, SOW BUGS, AND SPIDERS: **CRACK AND CREVICE TREATMENT:** Inject into cracks and crevices in all hiding places behind baseboards, sinks, cabinets, meter boxes, door frames, windows. **SPACE TREATMENT:** Spray at rate of 20 seconds per 1,000 cu. ft. of space. Fill room with mist. Disperse in all locations. **VOLUMETRIC TREATMENT:** Calculate void volume and treat at a rate of 20 seconds per 1,000 cu. ft.

BED BUGS: Spray mattresses, particularly around tufts and seams. Take bed apart and spray into all joints. Treat baseboards, into cracks around moldings, molding surfaces and floors.

CARPET BEETLES, CIGARETTE BEETLES, CONFUSED FLOUR BEETLES, DRUG STORE BEETLES, GRAIN MITES IN EXPOSED ADULT AND LARVAE STAGES, GRANARY WEEVILS, RED FLOUR BEETLES, RICE WEEVILS, AND SAWTOOTHED GRAIN BEETLES: Infested stored products should be fumigated or treated by other effective methods using an approved product intended for this purpose.

CRACK AND CREVICE TREATMENT: Inject into cracks and crevices, processing and handling equipment, around cartons, and containers, and other areas where these insects tend to congregate. **SPACE TREATMENT:** Spray 20 seconds per 1,000 cu. ft. of space contacting as many insects as possible. Repeat treatment as necessary, but not more than once per week.

ANGUONIDS GRAIN MOTH, CHOCOLATE MOTH, INDIAN MEAL MOTH, MEDITERRANEAN FLOUR MOTH: Infested stored products should be fumigated or treated by other effective methods using an approved product intended for this purpose. **SPACE TREATMENT:** Spray 5 to 10 seconds for each 1,000 cu. ft. of space. Repeat treatment as necessary, but not more than once per week.

FLEAS IN BUILDINGS: Hold aerosol 36" above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 sq. ft. making sure that all floor, sofa and chair surfaces are contacted. Keep area closed for 15 minutes. Open and ventilate before re-occupying. Repeat treatment as necessary, but not more than once per week.