



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 12, 2012

Ms. Patricia A. Hodge,
Regulatory Specialist
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Boulevard
St. Louis, MO 63122-6682

**Subject: Amended Labeling; Response to EPA Letter Dated October 8, 2010 & Updates Per REDs for Pyrethrins and Piperonyl Butoxide
Whitmire PT® 20 Dairy and Farm Insect Fogger and Repellant, EPA Reg. No. 499-323
Your Submission Dated November 1, 2011**

Dear Ms. Hodge:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

General Statement:

1. Delete all text throughout the label marked with "strikethrough."

Ingredient Statement section comment(s):

2. To facilitate inclusion of required label language from the REDs for pyrethrins and piperonyl butoxide, you must do the following:
 - Revise the listing of "Piperonyl Butoxide, Technical*" to read "Piperonyl Butoxide*"
 - Revise the 1st footnote to read "*(butylcarbityl)(6-propylpiperonyl) ether and related compounds"

First Aid Statement section comment(s):

3. Revise the 2nd sentence within the "**HOT LINE NUMBER**" subsection to read "For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-832-HELP (4357), twenty-four (24) hours per day, seven (7) days per week."

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s):

4. Revise this subsection to read "Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapors. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse."

Precautionary Statements, Environmental Hazards Statement subsection comment(s):

5. To facilitate inclusion of required label language from the REDs for pyrethrins and piperonyl butoxide, you must revise this subsection to read:

"This pesticide is toxic to aquatic organisms, including fish and invertebrates. To protect the environment, do not allow pesticide to enter or run-off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area."

Directions for Use section comment(s):

6. To facilitate inclusion of required label language from the REDs for pyrethrins and piperonyl butoxide, you must insert the following new "USE RESTRICTIONS" subsection immediately following the statement "IT IS A VIOLATION OF FEDERAL LAW ...":

<p>USE RESTRICTIONS</p> <ul style="list-style-type: none"> • Apply this product only as specified on this label. • Do not contaminate of food or feedstuffs. • THIS PRODUCT IS INTENDED FOR INDOOR USE ONLY. • Do not allow adults, children, or pets to enter the treated area until vapors, mists, and aerosols have dispersed, and the treated area has been thoroughly ventilated. • Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. • Do not remain in treated area. Exit area immediately and remain outside the treated area until aerosols, vapors, and/or mists have dispersed. • Remove and cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use. • Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. • Do not apply directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow this product to enter any drain before or after application. • Remove pets, birds and cover fish aquariums before spraying.

Directions for Use, Subsection-Specific Comments:

7. To facilitate inclusion of required label language from the REDs for pyrethrins and piperonyl butoxide, you must make the following subsection-specific changes:
- Revise the existing "DAIRY FARM USE:" subsection to read "DAIRY FARM USE: Milking Parlor and Milk Room - Close all windows and doors. Close milk bulk tank lids to prevent contamination from spray and dead or falling insects. Remove or cover milking utensils before application. Direct fog upward and in all directions at a rate of 1 - 3 sec/1,000 ft3. Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying. Wash teats of animals before milking."
 - Within the existing "BEEF CATTLE OPERATIONS:" subsection, revise the 3rd, 4th and 5th sentences to read "Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying."
 - Within the existing "HORSE BARN AND STABLES:" subsection, revise the 3rd, 4th and 5th sentences to read "Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying."
 - Within the existing "POULTRY OPERATIONS:" subsection, revise the 4th and 5th sentences to read "Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying."
 - Within the existing "HOG OPERATIONS:" subsection, revise the 3rd and 4th sentences to read "Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying."
 - Within the existing "FLEAS:" subsection, revise the 3rd, 4th and 5th sentences to read "Remove animals before spraying. Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying."
 - Within the existing "KENNELS AND CATTERIES:" subsection, revise the 2nd sentence to read "Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying."
 - Within the existing "FLYING INSECTS (Cluster Fly, Flies, ...)" subsection, revise the 3rd and 4th sentences to read "Keep room closed for at least 15 minutes following treatment. Open windows and doors, and thoroughly ventilate treated area before reoccupying."

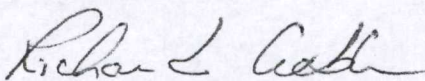
Storage and Disposal Statement section comment(s):

8. Revise the "PESTICIDE STORAGE:" subsection, to read "Store in a cool, dry (preferably locked) place away from heat or open flame that is inaccessible to children and pets."

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure: *Copy of label stamped "Accepted with Comments"*
000499-00323 D458168

ACCEPTED
With COMMENTS
In EPA Letter Dated:

WHITMIRE
PT 20

January 12, 2012
Under the Federal Insecticide, Fungicide and Farm Insect Fogger and Repellant
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No. [EPA Reg. No. 499-323] FARM FLY SPRAY]

499-323

~~KILLS AND REPELS~~
Flies • Gnats • Mosquitoes

Ants, Carpet Beetles, Centipedes, Cigarette Beetles, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Deer Flies, Drug Store Beetles, Face Flies, Fleas, Fruit Flies, Gnats, Grain Mites, Granary Weevils, Hornets, Horn Flies, Horse Flies, House Flies, Lice, Millipedes, Mosquitoes, Mud Daubers, Red Flour Beetles, Rice Weevils, Saw-toothed Grain Beetles, Small Flying Moths, Sow Bugs, Spiders, Stable Flies and Wasps

FOR USE IN AND AROUND, ~~BUT NOT LIMITED TO~~: Dairy Farms (including Milk House, Milk Parlor, Loafing Sheds, and Holding Lot), Hog Operations, Horse Stables, Poultry Operations, Beef Cattle Operations, Kennels and Farms, Campgrounds, Catteries and Horse Barns

ACTIVE INGREDIENTS:

Pyrethrins, a botanical insecticide 0.5%
Piperonyl Butoxide, Technical* 4.0%

OTHER INGREDIENTS: 95.5%
TOTAL: 100.0%

* Equivalent to 3.2% (butylcarbityl)(6-propylpiperonyl) ether and 0.8% related compounds

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See side panel for First Aid and Precautionary Statements.

EPA Reg. No. 499-323 • EPA Est. No. 7969-MO-1

NET WEIGHT: 1 lb., 4 oz. (20 oz.)
[Alternate Text: "Net Weight: 1 lb., 9 oz. (25 oz.)"]

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 poison control center or doctor. 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 min. Call a poison control center or doctor for treatment advice.

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

IF INHALED: Remove victim to fresh air. If 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 container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-832-HELP(4357).

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Do not remain in treated area and ventilate the area after treatment is completed. Avoid breathing of vapor. Avoid contact with skin, eyes or clothing. Wash thoroughly after using and before smoking or eating. Do not contaminate water, food or foodstuffs. Remove all pets and birds. Cover fish tanks or remove before spraying.

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

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. Do not spray on plastic, painted or varnished surfaces or directly into any electronic equipment such as radios, televisions, computers, etc.

DIRECTIONS FOR USE

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

For best results product should be used when can temperature is above 60°F. If temperature is below 60°F, store at room temperature until a temperature of above 60°F is reached.

DAIRY FARM USE: Milking Parlor and Milk Room - Close all windows and doors. Direct fog upward and in all directions at a rate of 1 - 3 sec/1000 ft³. Keep room closed for 15 min after treatment. Open and ventilate before reoccupying. Cover milking utensils and milk to prevent contamination from spray and dead falling insects.

ANIMAL USE (Do not spray sick animals): From approximately 2 ft distance, thoroughly spray entire animal as it is being released to pasture. Do not spray directly toward animal's eyes. Spot treat withers, shoulders and back where saliva accumulates from head tossing.

STANCHION BARN USE: Walk behind animals and direct spray over backs allowing 1 sec/animal. For most effective results, apply each morning.

BEEF CATTLE OPERATIONS: In barns, close all windows and doors. Spray at the rate of 1 - 2 sec/1000 ft³. Keep area closed for 15 min following application. Ventilate area after treatment is complete. ~~If area cannot be closed, double the dosage.~~ Repeat application daily or as necessary.

HORSE BARN AND STABLES: Close all windows and doors. Spray at a rate of 1 - 2 sec/1000 ft³. Keep area closed for 15 min following application. Ventilate area after treatment is complete. ~~If area cannot be closed, double the dosage.~~ For animal application, lightly mist over the backs of horses and ponies from a distance of at least 2 ft. Repeat application daily or as necessary.

POULTRY OPERATIONS: Use only in empty poultry houses (when birds are not present). Close all windows and doors. Spray at the rate of 1 - 2 sec/1000 ft³. Keep area closed for 15 min following application. Ventilate area after treatment is complete. ~~If area cannot be closed, double the dosage.~~ Treat daily or as necessary.

HOG OPERATIONS: In hog houses, close all windows and doors. Spray at the rate of 1 - 2 sec/1000 ft³. Keep area closed for 15 min after application. Ventilate the area after treatment is completed. ~~If area cannot be closed, double the dosage.~~ For animal application, direct spray over backs and spray for 1 - 2 sec/hog. Do not spray directly toward animal's face or eyes. Repeat application daily or as necessary.

MUD DAUBER AND WASP NESTS: Spray mist directly on insects and their nests from approximately 2 ft distance. Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Spray into hiding and breeding places contacting as many insects as possible.

FLEAS: General Volumetric Treatment: Hold aerosol 36" above floor and direct spray toward floor and lower walls at a rate of 10 sec/100 ft² making sure that all floor areas are contacted. Change litter before application. Keep area closed for 15 min. Remove animals before spraying. Open and ventilate before reoccupying. Repeat treatment after 7 days or as necessary.

KENNELS AND CATTERIES: Remove animals before spraying. Ventilate after treatment is completed.

FLYING INSECTS (Cluster Fly, Flies, Fruit Flies, Gnats, Mosquitoes, Small Flying Moths): *GENERAL VOLUMETRIC TREATMENT:* Close all windows and doors and direct fog upward at a rate of 1 - 3 sec/1000 ft³. Disperse in all locations. Keep area closed for 15 min. Open and ventilate before reoccupying. Repeat treatment as necessary.

FOR EXPOSED ADULT AND LARVAL STAGES OF - Carpet Beetles, Cigarette Beetles, Confused Flour Beetles, Drug Store Beetles, Grain Mites, Granary Weevils, Red Flour Beetles, Rice Weevils, and Sawtoothed Grain Beetles: Contact as many insects as possible. Inject into cracks and crevices of pantries, cabinets and other places where insects harbor. Apply around cartons, and containers, and other areas where these insects tend to congregate. *GENERAL VOLUMETRIC TREATMENT:* Apply 20 sec/1000 ft³ of space. Repeat treatment weekly or as insects appear. Infested stored products should be fumigated or treated by other effective methods using an approved product intended for this purpose.

OUTDOOR GROUND APPLICATION: Flies, Gnats and Mosquitoes in open areas near buildings and in campgrounds. Best results are obtained when wind speed is five (5) MPH or less. Apply at a rate of 60 - 80 sec/ acre. Spray in wide swaths across area to be treated. Allow spray drift to penetrate dense foliage. Repeat treatment as necessary.

STORAGE & DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area away from heat or open flame and inaccessible to children.

PESTICIDE DISPOSAL: Wastes 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! **If empty:** Offer for recycling, if available. **If partially filled:** Call your local solid waste agency for disposal instructions.

CONDITIONS OF SALE AND WARRANTY

Follow the **Directions for Use**. It is impossible to eliminate all risks inherently associated with use of this product, and therefore all such risk shall be assumed by the Buyer. Whitmire warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions for Use**, subject to the inherent risks, referred to above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW: (A) WHITMIRE MAKES NO OTHER WARRANTIES EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY, (B) BUYER'S EXCLUSIVE REMEDY AND WHITMIRE'S AND SELLER'S EXCLUSIVE LIABILITY, WHETHER IN CONTRACT, TORT, NEGLIGENCE, STRICT LIABILITY, OR OTHERWISE, SHALL BE LIMITED TO REPAYMENT OF THE PURCHASE PRICE OF THE PRODUCT, AND (C) WHITMIRE AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, INCIDENTAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. Whitmire and the Seller offer this product, and the Buyer accepts it, subject to these **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of Whitmire.

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



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