



000499-00376-061799

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Systems Integration Group, Inc.

PM03

499-376

6/17/99

1063

United States Environmental Protection Agency

Mr. H. Wayne Moran
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122-6682

305/555-172
18/8

Dear Mr. Moran:

JUN 17 1999

Subject: Label Amendment, Response to PRN 98-6
Whitmire Attain PT 1810 Total Release Insecticide
EPA Reg. No. 499-376
Your Submission Dated February 11, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

Based on the fact that your product is intended for commercial greenhouse use, and on the information you provided in your letter dated February 9, 1999, we will agree to most of your proposed deviations from the requirements of PR Notice 98-6. Given the calculations in the attachment to your letter, we agree that an explosion resulting from applying the product in a greenhouse is unlikely, even if an ignition source is present. However, as discussed with Mr. Jonathan Berger of your staff on April 7, 1999, in lieu of requiring that all sources of ignition be turned off, we are requiring a label statement instructing the handler during application to maintain a distance of at least 10 horizontal feet between the product and any potential source of ignition (comment 11 below). Due to the potential fire hazard should a fogger be activated in close proximity to an ignition source.

Label changes:

1. The paragraph in the Agricultural Use Requirements box relating to PPE for early entry should be placed immediately after the REI statement.
2. Revise the fourth sentence under PREAPPLICATION DIRECTIONS to read as follows: "All human occupants and pets must be removed before treatment."
3. Revise the fifth sentence under PREAPPLICATION DIRECTIONS to read as follows: "Greenhouse must be ventilated according to the requirements of the Worker Protection Standard before reentry."
4. Please provide information in the DIRECTIONS FOR USE to enable the user to determine when an application of this product is indicated (e.g., pest population or plant damage); a recommended frequency of application; and when retreatment is indicated.
5. Revise the header below the Agricultural Use Requirements Box to read: "FOR USE IN GREENHOUSES ON:".

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGBKEN							
DATE ▶	Jun 17, 1999							

6. Under ENVIRONMENTAL HAZARDS revise the first sentence to read: "This product is highly toxic to fish and aquatic invertebrates."

7. Near the beginning of the DIRECTIONS FOR USE section, above the Agricultural Use Requirements box, insert the following statements: "Do not apply this product in a way that will contact workers of other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation."

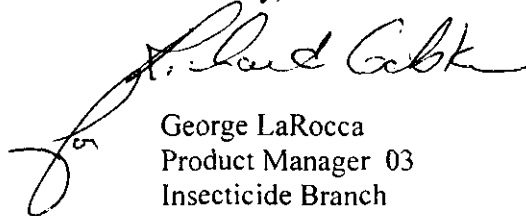
8. In the DIRECTIONS FOR USE, insert the following statement: "Do not place cans within 10 horizontal feet of any ignition source such as pilot lights, other open flames, or running electrical appliances that cycle off and on."

9. Marion Johnson, John Leahy, Richard Gebken and myself (George LaRocca) met as an adhoc team to discuss your email message to Marion Johnson dated 06/09/99¹, addressing the Agency request to use an application rate expressed as cubic feet. The Agency agrees with your rebuttal, provided the maximum application rate cannot exceed the explosive potential for the product after being released. In addition a specific re-treatment interval should be used to instruct the applicator. Several acceptable application interval directions are as follows:

- (a) "Do not Reapply Product For _____.
(Insert number of day(s), week(s) or month(s).)"
- (b) "Reapply every _____. (Insert number of day(s), week(s), or month(s).)"
- (c) "Do Not Repeat Treatment For _____.
(Insert number of day(s), week(s), or month(s).)"
- (d) "Repeat every _____. (Insert number of day(s), week(s) or month(s).)"

If you have any questions regarding this letter, please contact Richard Gebken of my team at (703) 305-6701.

Sincerely,



George LaRocca
Product Manager 03
Insecticide Branch
Registration Division (7505C)

Enclosure

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¹ Additionally on the issue of using cubic feet in the direction for use: As discussed earlier with John Leahy, the application of these products is intended to raise the material above the foliage and for it to gradually settle back on the plant material and cover a square measurement. To include the unused head space in the calculation could vary the dose considerably depending on the height of the greenhouse and could lead to plant damage from over application. These are not "smoke" materials intended to fill the cubic space and pests in those spaces. The supporting rational was to explain a "worse case" for explosive potential not to indicate application.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool dry place away from heat or open flame.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, causes irreversible eye damage. Due to corrosive nature, may be harmful or fatal if swallowed. Do not get in eyes. Avoid contact with skin or clothing. Wear goggles or face shield while handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not contaminate water, food, food stuffs or feed. Remove all pets. Cover fish tanks or remove. Do not remain in treated area and ventilate area after treatment is completed for 30 minutes.

PERSONAL PROTECTIVE EQUIPMENT: Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category C on an EPA chemical resistance category selection chart.

APPLICATORS AND OTHER HANDLERS MUST WEAR: Long-sleeved shirt and pants, chemical-resistant gloves, such as Barrier laminate or Butyl rubber ≥ 14 mils or Nitrile rubber ≥ 14 mils or Neoprene rubber ≥ 14 mils or Polyvinyl chloride (PVC) ≥ 14 mils, or Viton ≥ 14 mils, shoes plus socks and protective eyewear. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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 fish. Keep out of lakes, streams or ponds. Do not contaminate water when disposing of equipment wash waters. 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. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Direct Use" on this label very carefully.



Highly Flammable Ingredient
Ingrediente Altamente Inflamable

ADDITIONAL PRECAUTIONS: 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. Make sure spray is unobstructed above units by foliage or other physical objects in order to obtain maximum distribution of fog.

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.wmrg.com

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Whitmire

PT® 1810

Total Release Insecticide

Contains Talstar® Insecticide

FOR COMMERCIAL USE ONLY. NOT FOR RESIDENTIAL USE.

FOR USE IN: Greenhouses

KILLS: Aphids, Armyworms, Bagworms, Caterpillars, Fungus Gnats, Mealybugs, Omnivorous Leafrollers, Plant Bugs, Scale, Thrips, Mites, and Whiteflies.

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

ACTIVE INGREDIENTS:

Bifenthrin 0.5%

OTHER INGREDIENTS: 99.5%

*Talstar - Registered TM of FMC Corporation.

EPA Reg. No. 499-376 EPA Est. No. 499-MO-1

KEEP OUT OF REACH OF CHILDREN
DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Get medical attention.

IF INHALED: Remove person to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth.

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

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

See side panel for additional precautionary statements.

NET WEIGHT: 1 LB.



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

ACCEPTED
with COMMENTS
by EPA Letter Dated

17 1999

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

499-376

DIRECTIONS FOR USE

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

PREAPPLICATION DIRECTIONS: For best results, apply during early evening when foliage is dry and temperature is between 60°-80°F. Shut off all exhaust fans and close all windows, doors and ventilators. Keep greenhouse closed for four hours, preferably overnight, following treatment. All human occupants and pets should be removed before treatment. Greenhouse should be ventilated before reentry.

TOTAL RELEASE DOSAGE: Use one 1 lb. can per 3,000 square feet. In situations where insect control is difficult due to tough to control insects or high crop density, it is permissible to use one 1 lb. can for 1,500 - 3,000 square feet. For smaller greenhouses between 1,500 - 3,000 square feet, use one 1 lb. can.

TO ACTIVATE CANS: Start with can farthest away from exit door. Activate each can by pressing tab down and locking it. Leave greenhouse at once. The entire contents will release automatically.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers in farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard. Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

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 area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

PPE required for early entry to treated areas that is permitted under Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: Coveralls, Chemical-resistant gloves, such as Barrier laminate or Butyl rubber ≥ 14 mils or Nitrile rubber ≥ 14 mils or Neoprene rubber ≥ 14 mils or Polyvinyl chloride (PVC) ≥ 14 mils or Viton ≥ 14 mils, shoes plus socks and protective eyewear.

FOR USE INDOORS ON, BUT NOT LIMITED TO:

Bedding plants (such as): impatiens, marigolds, petunias, geraniums, and garden mums.

Cut flowers (such as): roses, chrysanthemums, carnations, snapdragons, and orchids.

Flowering hanging baskets (such as): tuchisia, lantana, New Guinea impatiens, ivy, and geraniums.

Foliage (such as): Boston fern, dracaena, ficus, schefflera, and philodendron.

Potted flowering plants (such as): poinsettia, chrysanthemums, Bonst's azaleas, lilies, African violets, geraniums, hibiscus, kalanchoes, and begonias.

Ornamentals (such as): azalea, barberry, cotoneaster, euonymus, holly, juniper, oak, pine, rhododendron, roses, spiraea, spruce, viburnum and yew.

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.

PLANT SAFETY NOTICE: Good greenhouse management must override the use of this product when any conditions might be created by tightly closing greenhouses that would harm plant foliage or flowers. Example: Creation of high temperatures or humidity conditions. Do not use this product in greenhouses with ~~improper~~ defective gas heating systems or, when open combustion exists.