

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

November 18, 2002

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

Subject:

Label Amendment - Updating First Aid Statement in Accordance with PR Notice

2001-1,

Whitmire PT 239 TRI-DIE Insecticide

EPA Reg. No. 499-385

Your Submission Dated November 6, 2002

Dear Ms 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. Please submit three (3) 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. Reinstate the inhalation precautionary text and the "Note to Operator". The inhalation toxicity is Tox Category III.
- 2. The statement "Wear protective eyewear (goggles, face shield or glass)." should follow the statement "Causes substantial but temporary eye injury".

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

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

exander for

MOW TO USE THE WHITMORE MICHILLIES CRACK AND CREVICE" INJECTION SYSTEM

Consults was Consultative Consu and other small openings. Release approximately one-second of prod-uct. Move injector tip along cracks while treating at the rate of three tim-ser test per second. For closed voids calculate the void's cubic area and treat at the rate of three to five seconds per three cubic leet. For closed wold areas drill small access holes. Several holes may be required in long-running voids. This product can leave a white residue. This residue can normally be removed with a damp cloth or sponge.

INDOOR TREATMENTS

CENTIPEDES, COCKROACHES, CRICKETS, DERMESTIOS, EARWIGS, MILLIPEDES, SCORPIONS, SOWBUGS AND SPI-EMPTIMES, IMPLIFICATION, OWNER THEM, GUTENING AND OF THE DEPR.S. Type of with the prescribed dissage into cacks and convices and wold spaces where insects may be harboring. These may include, but are not limited to, openings around pixes and sinks, under refriger-tors, behind desectoreds, westing machines, sloves, cabiness, sever.

For treatment of these pests in inaccessible voids (wall voids, equip-ment voids, attics, crawl spaces, and manholes where human contact with treated surfaces will be minimally, calculate void horizontal surface area and treat at a rate of one second per souare font

APPLICATIONS SI FOOD HANDLING ESTABLISHMENTS

Food handling establishments are places other than private residences Procure instituting assessments are peaces over uself in role resolutions in which bod is held, processed, prepared or served. In supermarkets, restaurants, meat packing and other bod handling establishments, cover or remove all food and foodstuffs prior to treatment. All benches, shelving, load processing surfaces and usersils, should be covered or removed, or thoroughly washed with an effect followed by a potable water rinse prior to use.

POOD AREAS - Application limited to Crack & Crevice Treat-ment Oully: Includes areas for receiving, storage, packing (canning, bollling, wapping, booting), preparing, edible waste storage and enclosed processing systems (fills, dairies, schole oils, syntay). Serv-ing areas (when food is exposed and facility is in operation) also would be considered a food area.

Apply directly into cracks and crevices and void areas using injection table in points between different elements of construction, between nace in powers unwerse exercises of construction, detween equipment and floors, openings leading to voice and hollow spaces in walts, equipment legs and bases where insects hide. Care should be taken to evoid depositing the product onto exposed surfaces or intro-ducting the material into the air. Avoid contamination of food or loodprocessing surfaces.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD-HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

Contains no CFCs or other ozone depleting sub-stances. Federal regulations prohibit CFC propel-lants in aerosols.

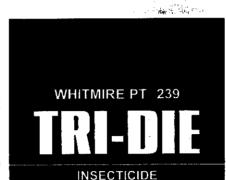


A PRESCRIPTION TREATMENT* brand insecticide from: Whitnier Micro-Gen Research Laboratories, Inc. 3568 Tree Court Industrial Blvd. St. Louis MO 53122-6682

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PT 239 TRI-DIE - Container Version 2.0.1 (rev. 9/02)





For Pest Control Operators and Commercial Use Only

KOLLS:
Ants, Bedbugs, Beetles, Booklice, Boxelder Bugs, Cadellés, Centicodes, Cheese Mites, Chocotate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Dark Meatworms, Demestics, Drugstore Beetles, Farwys, Ehmed Beetles, Friedska, Fild Grain Beetles, Fleas, Grain Mites, Grain Weevits, Garnary Weevit, Ground Beetles, Indian Meal Moths, Lice, Mealworms, Millipodes, Pillbugs, Red Flour Beetles, Rice Weevits, Sawhoothed Grain Beetles, Scoppions, Sherfsin, Sowbugs, Spiders, Termites, Ticks, Trogodermas and Yellow Mealworms.

FOR USE IN AND AROUND:

Apartments, Homes, Hospitals", Hotels, Food Storage Areas, Meet Packing Plants, Food Processing Plants, Motels, Nursing Homes", Restaurants and Other Food Handling Establishments, Supermartests, Schools", Transportation Equipment (Sees, Boats, Ships, Trains) and Warehouses and Other Commercial and Industrial Buildings.

Do not apply in hospital or reussing home rooms white occupied or in any rooms occupied by the elderty or infirm. Remove patients prior to treatment.
 Ventilate room for two hours before returning patients to room.
 Do not apply to classrooms when in use.

ACTIVE INGREDIENTS: Pyrethrins 0.6% Pipercenyl Butovicte, Technical* 4.8% Amorphous Silica Diswide 48% 8.0%

OTHER INGREDIENTS: Equivalent to 3.94% (objectorly) TOTAL 100.0% onlines petroleum distillate.

KEEP OUT OF REACH OF CHILDREN WARNING

See side panel for additional precautionary statements.

EPA Reg. No. 499-385 . EPA Est. No. 499-MO-1

NET WEIGHT: 8 oz.



PRECAUTIONARY STATEMENTS

FIRST AID

IF ON SKIN ON CLOTHING: Take off contaminated clothing Rinse skin immediately with plenty of water for 15-20 minute Call a poison control center or doctor for treatment advice.

F M EYES: Hold eye open and rines 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

ALED: Move person to fresh air. If person is not breath ing, call 911 or an ambulance, then give artificial respiration preferably by mouth-to-mouth, if possible. Call a poison contro center or doctor for further treatment advice.

IF SYMALLOWED: 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 nol give anything by mouth to an unconscious person.

Have the product container 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

HAZAROS TO HUMANIS AND DOMESTIC ANIMALS

WARMING: Causes skip imitation. Do not get on skip or on cight ing. Wear protective eyemear (goggles, face shield or glasses). Causes substantial but temporary eye injury. Do not get in eyes, on skin or on clothing. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling. Remove confaminated clothing and wash before muse. Prolonged or frequently repeated skin contact may cause allergic reactions in some indivi tals, remove patients prior to treatment. Ventilate area for two hours orior to returning patients

ENVIRONMENTAL HAZARDS

This product is toxic to floth, birds, and other wildlife. Do not apply directly to water. Apply this product only as specified on the label. Do not contaminate water by cleaning of equipment or disposal of wastes.

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

SHAKE WELL BEFORE USING

DIRECTIONS FOR USE

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

See supplemental label for complete Directions for Lise.

Shake well before use. For best results, use in unright position only. Do not spray on plastic, painted or vamished surfaces or directly into any electronic equipment such as radios, televisions, computers, telenones, etc. where the powdery residue may foul or short electric con-

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. STORAGE: Store in a cook dry place away from heat or an open

CONTAINER DISPOSAL: This container may be recycled in the lew 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. (OD NOT PLINCTMRE) if recycling is not available, wrap the container and discard in the trash.

ACCEPTED with COMMENTS in EPA Lotter Dated

NOV 1 8 2002

Under the Federal Insecticing Fungicide, and Rodenticide Act ns unrealed, for the positions registered under 224 305 Joc 11-6-2002 .pd

insects hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food-processing surfaces.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD-HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

INDOOR AND OUTDOOR TREATMENTS

CARPENTER ANTS: Locate source of infestation or areas of suspected activity. Inject 5-10 seconds of product into insect tunnels and cavities. Treat points of entry or exits from voids such as around doors, windows and siding.

BOXELDER BUGS, CLOVER MITES, CLUSTER FLIES AND ELMLEAF BEFTLES: Inject cracks and crevices and/or voids where these insects may be harboring or hibernating.

Infested areas include, but are not limited to, cracks and crevices, behind siding, wall voids, around window and door frames.

OUTDOOR TREATMENTS

ANTS, CENTIPEDES, CLOVER MITES, COCKROACHES, CRICKETS, EARWIGS, GROUND BEETLES, MILLIPEDES, PILLBUGS, SCORPIONS, SOWBUGS AND SPIDERS: Treat cracks around doors, windows, under siding and voids foundation level, beneath guards on loading docks, into cracks in foundations and floors and in other places where these pests may enter building.

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.wmmg.com © 2002 Whitmire Micro-Gen Research Laboratories, Inc.

WHITMIRE PT® 239

TRI-DIE

INSECTICIDE

For Pest Control Operators and Commercial Use Only

KILLS:

Ants, Bedbugs, Beetles, Booklice, Boxelder Bugs, Cadelles, Centipedes, Cheese Mites, Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Dark Mealworms, Dermestids, Drugstore Beetles, Earwigs, Elmleaf Beetles, Firebrats, Flat Grain Beetles, Fleas, Grain Mites, Grain Weevils, Granary Weevil, Ground Beetles, Indian Meal Moths, Lice, Mealworms, Millipedes, Pillbugs, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Scorpions, Silverfish, Sowbugs, Spiders, Termites, Ticks, Trogodermas and Yellow Mealworms.

FOR USE IN AND AROUND:

Apartments, Hornes, Hospitals*, Hotels, Food Storage Areas, Meat Packing Plants, Food Processing Plants, Motels, Nursing Homes*, Restaurants and Other Food Handling Establishments, Schools**, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains) and Warehouses and Other Commercial and Industrial Buildings.

* Do not apply in hospital or nursing frome rooms while occupied or in any rooms occupied by the elderly or infirm. Remove patients prior to treatment. Ventitate room for two hours before returning patients to room.

"" Do not apply to classrooms when in use.

ACTIVE INGREDIENTS:

Pyrethrins	,		, , , , , , , , , , , , , , , , , , , ,		0.6%
Piperonyl Butoxide, To	chnical*				4.8%
Amorphous Silica Dic	xide	,			8.0%
OTHER INGREDI	ENTS:		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<u> </u>	36.6%
* Equivalent to 3.84% (butylcarbityl)(6-propylpiperonyl) ether and 0.96% related compounds.				TOTAL: 10	00.0%

KEEP OUT OF REACH OF CHILDREN WARNING

See page 2 for additional Precautionary Statements.

EPA Reg. No. 499-385 • EPA Est. No. 499-MO-1



PT 239 TRI-DIE - Supplemental Label Version 2 0.1 (rev. 9/02)



PRECAUTIONARY STATEMENTS

FIRST AID

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 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 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. 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.

Have the product container 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.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes skin irritation. Do not get on skin or on clothing. Wear protective eyewear (goggles, face shield or glasses). Causes substantial but temporary eye injury. Do not get in eyes, on skin or on clothing. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Prolonged or frequently repeated skin contact may cause alleroic reactions in some individuals.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not apply directly to water. Apply this product only as specified on the label. Do not contaminate water by cleaning of equipment or disposal of wastes.

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.

DIRECTIONS FOR USE

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

Shake well before use. For best results, use in upright position only.

Do not spray on plastic, painted or varnished surfaces or directly into any electronic equipment such as radios, televisions, computers, telephones, etc. where the powdery residue may toul or short electric contacts and circuits.

In hospitals, remove patients prior to treatment. Ventilate area for two hours prior to returning patients.

STORAGE AND DISPOSAL

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

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

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.

HOW TO USE THE WHITMIRE MICRO-GEN CRACK AND CREVICE*INJECTION SYSTEM

Use Whitmire PT 239 TRI-DIE with the supplied actuator and injection tubes or other Whitmire Micro-Gen equipment. Inject PT 239 TRI-DIE into cracks and crevices or void spaces where insects may be harboring, living and breeding. Place injector tip into cracks, crevices, holes and other small openings. Release approximately one-second of product. Move injector tip along cracks while treating at the rate of three linear feet per second. For closed voids calculate the void's cubic area and treat at the rate of three to

five seconds per three cubic feet. For closed void areas drill small access holes. Several holes may be required in long-running voids. This product can leave a white residue. This residue can normally be removed with a damp cloth or sponge.

INDOOR TREATMENTS

CENTIPEDES, COCKROACHES, CRICKETS, DERMESTIDS, EARWIGS, MILLIPEDES, SCORPIONS, SOWBUGS AND SPIDERS: Inject with the prescribed dosage into cracks and crevices and void spaces where insects may be harboring. These may include, but are not limited to, openings around pipes and sinks, under refrigerators, behind baseboards, washing machines, stoves, cabinets, sewer, floor drains and meter boxes.

For treatment of these pests in inaccessible voids (wall voids, equipment voids, attics, crawl spaces, and manholes where human contact with treated surfaces will be minimal), calculate void horizontal surface area and treat at a rate of one second per square foot.

BOOKLICE, SILVERFISH, FIREBRATS: Treat cracks and crevices in baseboards, door frames, bookcases and other storage area. Treat wall and other voids where insects may be harboring.

For treatment of these pests in inaccessible voids (wall voids, equipment voids, attics, crawl spaces, and manholes where human contact with treated surfaces will be minimal), calculate void horizontal surface area and treat at a rate of one second per square foot.

ANTS: Inject cracks, crevices and voids where ants may be traveling and/or harboring, including, but not limited to, around doors, window frames, wall voids and other structural cracks and crevices and void areas.

FLEAS, LICE AND TICKS: Treat pet bedding, floor and floor coverings and all areas where pests may inhabit at the rate of one-second per 10 square feet. Treat cracks and crevices behind moldings, shelving, baseboards, pipe openings, and all other cracks. Repeat application when effectiveness diminishes.

NOTICE: PT 239 TRI-DIE has been tested on several types of carpet, fabric and other household furnishings without adverse affects. Because of the wide variety of floor types and finishes, treat a small inconspicuous area before treating the entire area. Avoid contact with antique finishes.

BEDBUGS: Take bed apart and treat cracks, joints and interior of framework. Mattresses and box springs should be treated especially tufts,

folds, and edges. Picture frames, moldings an all cracks and crevices in the room should also be treated. Do not use in hospital patient quarters.

STORED PRODUCT PESTS (Adult and Larval Stages): For treatment of Cadelles, Cheese Mites, Chocolate Moths, Cigarette Beetles, Contused Flour Beetles, Dark Mealworms, Drugstore Beetles, Flat Grain Beetles, Grain Mites, Grain Weevils, Granary Weevils, Indian Meal Moths, Mealworms, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Trogodermas and Yellow Mealworms, inject into cracks and crevices and/or voids where these insects may be harboring. Infested areas may include, but are not limited to, cracks and crevices in cabinets, pantries, wall voids and in machinery.

TERMITES: Spot treatment for localized intestation. Probe to locate galleries, drill holes and inject at the rate of 5-10 seconds per hole into the active galleries and void areas. The purpose of such treatment is to kill workers or winged forms which may be present in the treated galleries at the time of treatment and to impart a temporary resistance at these places to attack which may aid in the prevention of immediate reinfestation. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but merely a supplement.

APPLICATIONS IN FOOD-HANDLING ESTABLISHMENTS

Food-handling establishments are places other than private residences in which food is held, processed, prepared or served. In supermarkets, restaurants, meat packing and other food handling establishments, cover or remove all food and foodstuffs prior to treatment. All benches, shelving, food processing surfaces and utensils should be covered or removed, or thoroughly washed with an effective cleaning compound followed by a potable water rinse prior to use.

FOOD AREAS - Application limited to Crack & Crevice Treatment Only: Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation) also would be considered a food area.

Apply directly into cracks and crevices and void areas using injection tube in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where