

499-385

02-05-2007

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

FEB - 5 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Patricia Hodge
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122

Dear Ms. Hodge:
Subject: Whitmire PT 239 Tri-Die Insecticide
EPA Reg. No. 499-385
Submission dated 12/22/05

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

In the list of pests on pages 1 and 4, revise "ants" to read "ants (except fire, pharaoh and harvester ants)." We are not aware of efficacy data for this product to support fire, pharaoh and harvester ants.

In the directions for "ants" on page 6, revise the directions to treat ants to read "Ants (except carpenter, fire, pharaoh and harvester ants)."

Move the footnotes on use in hospitals and nursing homes to a section of the directions for use entitled "General Precautions and Restrictions". ✓

Move to the "General Precautions and Restrictions" the following direction under bedbugs: "Do not treat the mattresses in hospital patient quarters" ✓

Delete the contradictory statement: "Do not apply to mattresses in hospital or nursing home rooms while occupied." ○

Revise and restore to the label the following statement as you have not provided justification for deleting it:

Do not apply to the rooms of hospitals, nursing care homes and similar care institutions while they are occupied by patients or the infirm. ✓

Add to the "General Precautions and Restrictions" the following language in the Pyrethrins RED: ✓

Do not use in aircraft cabins.

Except for applicator, do not enter or allow others to enter until sprays have dried. Only ✓
protected handlers may be in the area during application.

Do not allow pets to enter the treated area until sprays have dried. ✓

Do not wet articles to point of runoff or drip. Do not use treated articles until spray has ✓
dried.

Not for use in outdoor residential misting systems. ok

Remove or 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.

In accordance with the attached review, add to the First aid statements a Note to ✓
Physician which includes the following, if applicable: technical information on
symptomatology; use of supportive treatments to maintain life functions, medicine that
will counteract the specific physiological effects of the pesticide.

In accordance with the attached review, revise the Precautionary Statements as follows:

WARNING

Hazards to Humans and Domestic Animals

Contains Petroleum Distillate.

Causes skin irritation. Causes substantial but temporary eye injury. Harmful if absorbed ✓
through skin. Harmful if inhaled. Do not get in eyes, on skin or on clothing. Wash
thoroughly with soap and water after handling and before eating, drinking, chewing gum,
or using tobacco. Remove and wash contaminated clothing before reuse. Wear protective ✓
eyewear (goggles, face shield, or safety glasses). Avoid breathing spray mist. Prolonged
or frequently repeated skin contact may cause allergic reactions in some individuals.

In accordance with the Pyrethrins RED, add the following to the Precautionary
Statements:

Personal Protective Equipment (PPE). Mixers, loaders, applicators, and other handlers ✓
must wear the following: long-sleeve shirt, long pants, shoes and socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions
for washables exist, use detergent and hot water. Keep and wash PPE separately from
other laundry. Discard clothing and other absorbent material that have been drenched or
heavily contaminated with the product's concentrate. Do not reuse them. } ok

In accordance with the Pyrethrins RED, revise the Environmental Hazards Statement as
follows:

This product is toxic to aquatic organisms, including fish and invertebrates. Drift and ✓
runoff may be hazardous to aquatic organisms in water adjacent to treated areas. This
product may contaminate water through runoff. This product has a potential for runoff
for several weeks after application. Poorly draining soils and soils with shallow water
tables are more prone to produce runoff that contains this product. Do not apply directly
to water, to areas where surface water is present or to intertidal areas below the mean
high water mark. Do not contaminate water when disposing of equipment wash-waters | ok
or rinsate.

Revise the container disposal statements in accordance with PR Notice 2001-6.

In the Directions for Use, delete the statement "but not limited to" wherever it appears, as it may permit misuse.

In the directions for use in food handling establishments delete the statements about avoid depositing the product and avoiding contamination to read as follows:

Do ^{not} apply as a surface spray. Do not spray food processing surfaces or food. Do not apply as a ^{space} spray. *OK*


Delete from the directions for use "and in other places where these pests may enter building" as this may permit misuse.

Please note that notices of availability of EPA's reregistration eligibility documents (REDs) for products containing pyrethrins and piperonyl butoxide were published in the Federal Register July 26, 2006 (71FR42387 & 71FR42385). Links to these documents are available on the OPP website:

<http://cfpub.epa.gov/oppref/rereg/status.cfm?show=rereg>

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

for 

George LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505P)

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19**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 eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. 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.

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

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

SHAKE WELL BEFORE USING**DIRECTIONS FOR USE**

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

See full label for complete Directions for Use.

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 foul or short electric contacts and circuits.

HOW TO USE THE WHITMIRE MICRO-GEN CRACK & 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 1 second of product. Move injector tip along cracks while treating at the rate of 3 linear feet per second. For closed voids, calculate the void's cubic area and treat at the rate of 3 to 5 seconds per 3 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.

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 in the treatment area 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, crevices and void areas using an 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 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 & CREVICE TREATMENT, ARE NOT PERMITTED.

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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.

PESTICIDE DISPOSAL: Wastes resulting from uses 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 63122-6682

www.wmmg.com

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Whitmire PT[®] 239
Tri-Die
Insecticide

[ALTERNATE BRAND NAME: "Prescription Treatment brand Tri-Die Pressurized Silica + Pyrethrin Dust Formula 1"]

KILLS:

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

- * Do not apply to mattresses in hospital or nursing home rooms while occupied. 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%
Piperonyl Butoxide, Technical*	4.8%
Amorphous Silica Dioxide	8.0%

OTHER INGREDIENTS: 86.6%

* Equivalent to 3.84% (butylcarbityl)(6-propylpiperonyl) ether and 0.96% related compounds. TOTAL: 100.0%
Contains petroleum distillate.

**KEEP OUT OF REACH OF CHILDREN
WARNING**

See page 2 for First Aid and Precautionary Statements.

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

NET WEIGHT:



WHITMIRE MICRO-GEN
RESEARCH LABORATORIES, INC.
800-777-8570 www.wmmg.com

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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.

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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 foul or short electric contacts and circuits.

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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 1 second per square foot.

BOOKLICE, SILVERFISH, FIREBRATS: Treat cracks and crevices in baseboards, door frames, bookcases and other storage areas. 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 1 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 1 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 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, all cracks and crevices and voids in the room should also be treated. Do not treat the mattresses in hospital patient quarters.

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

TERMITES: Spot treatment for localized infestation. 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

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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 BEETLES: Inject cracks, 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 at foundation level, beneath guards on loading docks, into cracks in foundations and floors and in other places where these pests may enter building.

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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.

PESTICIDE DISPOSAL: Wastes resulting from uses 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.

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