

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 1 1 2008

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 9/5/07

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.

Revise the Disposal Statement as follows:

Container Disposal. Do Not Puncture or Incinerate!

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency [or toll free number or website which meets the criteria of PR Notice 2007-1.] for disposal instructions.

On pages 6 and 7, in the sections on centipedes, etc., stored product pests, and boxelder bugs, etc., delete "but not limited to" as this may lead to misuse.

In accordance with your intent to limit outdoor use to points of entry from the outdoors, delete "such as" from the directions for use for carpenter ants.

Note the following:

Additional labeling requirements may be required in accordance with EPA's reregistration eligibility documents (REDs) for products containing pyrethrins and piperonyl butoxide. These documents 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.

Changes will be required to pesticide containers in accordance with PR Notice 2007-4. A copy is available at the following website: http://www.epa.gov/PR Notices/pr2007-4.pdf

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

Sincerely,

George LaRocca

Product Manager 13

Insecticide Branch

Registration Division (7505P)

Whitmire PT® 239 Tri-Die Insecticide

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

KILLS:

Ants (except Fire, Harvester and Pharaoh), 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

† See special instructions for these sites under the General Precautions and Restrictions section of the Directions for Use.

ACTIVE INGREDIENTS:

Pyrethrins	0.69	%
Piperonyl Butoxide, Technical*	4.89	%
Amorphous Silica Dioxide	8.09	%
·	86.69	
Contains petroleum distillate.	TOTAL: 100.09	<u>~</u>

^{*} Equivalent to 3.84% (butylcarbityl)(6-propylpiperonyl) ether and 0.96% related compounds.

KEEP OUT OF REACH OF CHILDREN WARNING

See side panel for First Aid, Precautionary Statements, Directions for Use and Storage and Disposal.

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

NET WEIGHT:



ACCEPTED
with COMMENTS
In EPA Lever Dated:

JAN 1 1 2008

Under the Federal Insecticide, Fungicide, and Redenticide Act, as amended, for the posticide secutored under EPA Reg. No. **ICONTAINER LABEL - SIDE PANE**

PT 239 v3.0.1 - 9/4/07

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: May pose an aspiration pneumonia hazard. Contains petroleum distillate. No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: 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.

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

User Safety Requirements: 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.

ENVIRONMENTAL HAZARDS

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 tales 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.

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, <u>use in upright position only</u>. 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 – 5 seconds per 3 ft³. 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. Do not apply as a surface spray. Do not spray food processing surfaces or food. Do not apply as a space spray.

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

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 the use of this product must 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 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
© 2007 Whitmire Micro-Gen Research Laboratories, Inc.

Whitmire PT® 239 Tri-Die Insecticide

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ACTIVE INGREDIENTS:

Pyrethrins	0.6%
Piperonyl Butoxide, Technical*	4.8%
Amorphous Silica Dioxide	
OTHER INGREDIENTS:	86.6%
Contains petroleum distillate. TOTAL:	100.0%

^{*} Equivalent to 3.84% (butylcarbityl)(6-propylpiperonyl) ether and 0.96% related compounds.

KEEP OUT OF REACH OF CHILDREN WARNING

See page 2 for First Aid, Precautionary Statements and Directions for Use. See page 4 for Storage and Disposal.

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

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GENERAL PRECAUTIONS AND RESTRICTIONS

- † HOSPITALS AND NURSING HOMES: Do not apply to the rooms of hospitals, nursing care homes and similar care institutions while they are occupied by patients or the infirm. Remove patients prior to treatment. Ventilate room for two hours before returning patients to room. Do not treat the mattresses in hospital patient quarters.
- · 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.
- Remove or cover exposed food and drinking water, in the treatment area before application. Remove or cover dishes, utensils, food

processing equipment and food preparation surfaces, or wash them before use.

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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 sec/ ft².

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 sec/ ft².

ANTS (except fire, pharaoh and harvester ants): Inject cracks, crevices and voids where ants may be traveling and/or harboring, including, 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 sec/ 10 ft². 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.

STORED PRODUCT PESTS (Adult and Larval Stages): For treatment of Cadelles, 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 sec/ 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 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. Do not apply as a surface spray. Do not spray food processing surfaces or food. Do not apply as a space spray.

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

INDOOR AND OUTDOOR TREATMENTS

CARPENTER ANTS: Locate source of infestation or areas of suspected activity. Inject 5 - 10 sec 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 (except fire, pharaoh and harvester 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.

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.

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



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