

499-385

03-08-2012

1/6



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 8, 2012

Mr. H. Wayne Moran
Manager, Regulatory and Governmental Affairs
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Boulevard
St. Louis, MO 63122-6682

**Subject: Amended Labeling; Pending Review of Submitted Acute Toxicity & Revised CSFs
Whitmire PT® 239 Tri-Die Insecticide, EPA Reg. No. 499-385
Your Submission Dated November 18, 2011**

Dear Mr. Moran:

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(s):

1. Delete all text throughout the label marked with "strikethrough."
2. The proposed basic CSF and revised alternate CSFs 1-3 (dated November 18, 2011) are acceptable.

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

3. Insert the following text immediately preceding the 1st sentence within this subsection: "**Contains petroleum distillates.**"

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

4. Based on the presence of petroleum distillates at greater than 10% of the formulation, you must add the following text immediately preceding the existing "**IF IN EYES:**" statements as follows: "**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."

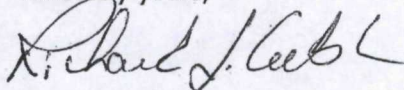
Directions for Use, BED BUGS subsection comment(s):

5. Revise the "**BED BUGS:**" subsection to read "**BED BUGS:** Apply to cracks, crevices, voids, and/or harborages, where evidence of bed bugs occurs, including bed frames, box springs, inside empty dressers, furniture and clothes closets, carpet edges, high and low wall moldings, behind headboards, pictures, wallpaper edges, and underneath all flat surfaces where human contact will occur. Do not make surface applications to mattresses or bedding. Mattress treatments must be limited to seams, folds, and edges only. Do not treat pillows, bedding, or clothing. Remove linens and wash before reuse. Allow treated mattress to dry thoroughly before remaking bed. Remove all clothes and other articles from dressers or clothes closets before application. Allow all treated areas to dry thoroughly before use. Do not use in patient rooms of hospitals and nursing homes for treatment of bed bugs. Reapply every 7-10 days, as needed, until infestation is eliminated."

Copies of your label stamped "Accepted with Comments" as well as copies of the acute toxicity and product chemistry reviews completed as part of this amendment are 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)

Enclosures: *Copy of label stamped "Accepted with Comments"*
Copy of acute toxicity review, dated February 13, 2012
Copy of product chemistry review, dated February 29, 2012

000499-00385 D458574

3
6

Whitmire PT® 239

Tri-Die Insecticide

[ALTERNATE BRAND NAME: "Prescription Treatment brand Tri-Die Pressurized Silica + Pyrethrin Dust Formula 1"] {added via Notification 10/3/05}

KILLS: Ants (excluding Fire, Harvester and Pharaoh), Bed Bugs, Beetles, Booklice, Boxelder Bugs, Cadelles, Cheese Mites, Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Dark Mealworms, Dermestids, Drugstore Beetles, Earwigs, Elm Leaf Beetles, Firebrats, Flat Grain Beetles, Fleas, Grain Mites, Grain Weevils, Granary Weevils, Ground Beetles, Indianmeal 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, Food Handling Establishments (including Food Processing Plants, Food Storage Areas, Meat Packing Plants, Restaurants and USDA Inspected Facilities), Homes, Hospitals†, Hotels, Motels, Nursing Homes†, Schools, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains), Warehouses and Other Commercial and Industrial Buildings

† See use restrictions for these sites under the Directions for Use.

ACTIVE INGREDIENTS:

Pyrethrins, a botanical insecticide	0.6%
Piperonyl Butoxide*	4.8%
Amorphous Silica Dioxide	8.0%

OTHER INGREDIENTS:	86.6%
Contains petroleum distillate.	TOTAL: 100.0%

* (butylcarbityl)(6-propylpiperonyl) ether and related compounds.

KEEP OUT OF REACH OF CHILDREN CAUTION

[Alternate text: See side panel(s) inside booklet for First Aid, Precautionary Statements, Directions for Use and Storage and Disposal.]

EPA Reg. No. 499-385 • EPA Est. No. 7969-MO-1

NET WEIGHT: _____

FIRST AID

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

Have the product container label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-832-HELP (43-7) 24hr/day, 7 days/week.

NOTE TO PHYSICIAN: Contains petroleum distillate – vomiting may cause aspiration pneumonia.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Breathing spray mist may be harmful.

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

ACCEPTED
With COMMENTS
In EPA Letter Dated:
March 8, 2012
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
499-385

USER SAFETY REQUIREMENTS

Remove clothing/PPE 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.

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 months or more after application. Poorly draining soils and soils with shallow water tables are more prone to produce runoff that contains this product.

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.

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. Do not apply directly into any electronic equipment such as radios, televisions, computers, telephones, etc. where the powdery residue may foul or short electric contacts and circuits.

DIRECTIONS FOR USE

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

SHAKE WELL BEFORE USING

Product dispenses best when held in upright position.

USE RESTRICTIONS

- Apply this product only as specified on this label.
- Do not apply more than 1 time/day.
- Only protected applicators may be in treatment area during application.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift.
- When used as a direct spray, do not enter or allow others to enter until sprays have dried.
- Do not spray on plastic, painted or varnished surfaces.
- Remove or cover all food and drinking water, in the treatment area, before application.
- Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces in the treatment area, or wash them before use.
- Except when applying to sewers or drains as instructed on this label, do not apply directly to 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 apply to the rooms of hospitals, nursing homes and similar care institutions while occupied by patients or the infirm. Remove patients prior to treatment. Do not treat mattresses in patient rooms. Ventilate room for 2 hr before reoccupying.
- Do not make outdoor applications during rain.

APPLICATION INSTRUCTIONS

CRACK & CREVICE® OR VOID APPLICATION: Use the supplied actuator and injection tubes or other application equipment approved by the registrant. Inject 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 and release approx. 1 sec of product. Move injector tip along cracks while treating at the rate of 3 ft/sec. For closed voids, calculate the void's cubic area and treat at the rate of 3 – 5 sec/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 that can normally be removed with a damp cloth or sponge.

DIRECT SPRAY: Apply the product in short bursts into the area where insects are to be contacted such as corners of the room, behind and under furniture or equipment. Apply from a distance of 18 – 24" from the surface and allow the material to drift to the area to be treated. The amount of product applied is not to exceed 10 sec/room for residential areas or 10 sec/100 ft² for commercial areas.

SPOT TREATMENT: Apply in short bursts, approx. 1 sec of product at a time. Limit individual spot treatments to an area no larger than 20% of the surface area. Any individual spot treatment shall not exceed 2 ft². Contact as many insects as possible. Before making any application, ensure product will not stain surface or leave an unacceptable residue.

INDOOR USE

COCKROACHES, CRICKETS, DERMESTIDS, EARWIGS, MILLIPEDES, SCORPIONS, SOWBUGS AND SPIDERS: Apply as a Crack & Crevice or void treatment into areas where insects harbor, such as 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 the horizontal surface area of the void and treat at the rate of 1 sec/ft².

BOOKLICE, SILVERFISH, FIREBRATS: Apply to cracks and crevices in baseboards, door frames, bookcases and other storage areas. Also apply in wall and other voids where insects may harbor.

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 the horizontal surface area of the void and treat at a rate of 1 sec/ft².

ANTS (except Fire, Harvester and Pharaoh): Inject product into cracks, crevices and voids where ants may be traveling and/or harboring (including around doors, window frames, wall voids and other structural cracks, crevices and void areas).

FLEAS, LICE AND TICKS: Treat pet bedding, floor and floor coverings, and all areas pests may inhabit at the rate of 1 sec/10 ft². Apply to cracks and crevices behind moldings, shelving, baseboards, pipe openings and all other cracks. **Notice:** This product 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.

BED BUGS: Take bed apart. Treat joints and channels if hollow, such as square or round tubing, and see that the interior framework is treated. Treat mattresses, especially tufts, folds and edges. Cover mattresses with clean bedding before use. When bed bugs are found in upholstered furniture, apply only to the infested tufts, seams, folds and edges, underneath all areas but do not apply to flat surfaces where human contact will occur. Apply as a Crack & Crevice treatment to all baseboards, moldings, beneath floor coverings and carpets, closets, shelves, curtains, furniture, picture frames and other areas where bed bugs harbor. Do not use in patient rooms of hospitals and nursing homes for treatment of bed bugs. Reapply every 7 – 10 days, as needed, until infestation is eliminated.

STORED PRODUCT PESTS – For adult and larval stages of Caddisflies, Cheese Mites, Chocolate Moths, Cigarette Beetles, Confused Flour Beetles, Dark Mealworms, Drugstore Beetles, Flat Grain Beetles, Grain Mites, Grain Weevils, Granary Weevils, Indianmeal Moth, Mealworms, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Trogodermas and Yellow Mealworms: Inject into cracks, crevices/corners and/or voids, such as in pantries, cabinets, food processing and handling equipment, machinery, wall voids and other places where these insects harbor. Apply around cartons, containers and other areas where these insects tend to congregate.

TERMITES: Apply as a 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 to attack, which may aid to prevent immediate reinfestation. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment, but are merely a supplement.

FOOD HANDLING ESTABLISHMENTS

Food handling establishments are places other than private residences in which food is held, processed, prepared or served. **Application limited to Crack & Crevice treatment only.**

FOOD AREAS: Include areas for receiving, serving, storing (dry, cold, frozen, raw), packing (canning, bottling, wrapping, boxing), preparing (cleaning, slicing, cooking, grinding), edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups).

NON-FOOD AREAS: Include areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage areas (after canning or bottling).

Remove or cover all food and drinking water, in the treatment area, before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces in the treatment area, or wash them before use.

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.

INDOOR AND OUTDOOR USE

CARPENTER ANTS: Locate source of infestation or areas of suspected activity. Inject 5 – 10 sec of product into insect tunnels and cavities. Inject into cracks, crevices and/or voids, where different elements of construction meet, that allow insects to enter and move about the structure.

BOXELDER BUGS, CLOVER MITES, CLUSTER FLIES AND ELMLEAF BEETLES: Inject into cracks, crevices and/or voids where these insects may harbor or hibernate, such as wall voids, behind siding, around windows and door frames.

OUTDOOR USE AROUND STRUCTURES

ANTS (excluding Fire, Harvester and Pharaoh), CLOVER MITES, COCKROACHES, CRICKETS, EARWIGS, GROUND BEETLES, MILLIPEDES, PILLBUGS, SCORPIONS, SOWBUGS AND SPIDERS: Treat cracks, crevices and/or voids of foundations, porches and patios, around doors and windows, under siding, beneath guards on loading docks and other places where these pests may find entry into the structure.

STORAGE AND 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:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

6
6**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.



Manufactured for:
Whitmire Micro-Gen Research Laboratories, Inc.
by BASF Corporation
3568 Tree Court Industrial Blvd.
St. Louis MO 63122-6682
Questions? Call 1-800-777-8570

© 2010 Whitmire Micro-Gen Research Laboratories, Inc.