

May 12, 1998

Ms. Kristin Sobocinski
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122

Dear Ms. Sobocinski:

Subject: Amendments - Revised Precautionary Statements and Statements of Practical Treatment
Avert Prescription Treatment TC 93A Bait
✓EPA Reg. No. 499-406
Avert Prescription Treatment TC 93B Bait
EPA Reg. No. 499-410
Your October 2, 1997 Submission

The acute dermal toxicity study entitled "An Acute Dermal Toxicity Study in Rabbits with TC-93" contained in the above referenced submission (MRID No. 444193-01) was found to be acceptable. It demonstrates that the test dermal toxicity for these products is category IV. The revised acute toxicity profile for the product is as follows:

acute oral toxicity	IV	acceptable
acute dermal toxicity	IV	acceptable
acute inhalation toxicity	---	waived
primary eye irritation	IV	acceptable
primary skin irritation	IV	acceptable
dermal sensitization	nonsensitizer	acceptable

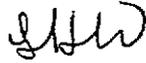
Therefore your proposed revisions to the Statement of Practical Treatments and the Precautionary Statements are acceptable. No precautionary statements and/or statements of practical treatment are required. There is no objection to the use of toxicity category III precautionary labeling and statement of practical treatment to address potential oral exposure. It is also suggested that you change the heading Statement of Practical Treatment to First Aid on both product labels. The revisions as previously outlined in the Agency letter of November 20, 1997 should also be incorporated.

2076

Page Two
EPA Reg. Nos. 499-406, 499-410

Submit two copies of your final printed labeling for each product. Stamped copies of the labels are enclosed for your records.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosures

4076

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

GENERAL USE DIRECTIONS: Whitmire TC 93A is a gel bait for use in controlling cockroaches and ants indoors and outdoors. Use suitable equipment capable of application into cracks and crevices, void spaces and other locations where insects may be harboring, living and breeding.

May also be used to fill the empty reservoir for TC 93B, EPA Reg. No. 499-410. To fill empty reservoir for TC 93B, first snap the handle of the Dock 'n Gun securely onto the top of the piston can and then attached the empty reservoir by screwing it onto the trigger (lever). Care should be taken not to depress the trigger of the Dock 'n Gun until the empty reservoir has been completely attached. To fill the reservoir, depress the trigger of the Dock 'n Gun until the reservoir is filled to approximately one inch from the end. Remove the filled reservoir and uncouple the Dock 'n Gun from the piston can. Clean excess product from the Dock 'n Gun following use.

APPLICATION RATES - ALL USES: For light infestations of cockroaches, a minimum of 4 - 6 bait points are recommended per 100 sq. ft. of treatment area. For heavy infestations of cockroaches, a minimum of 12 - 24 bait points are recommended per 100 sq. ft. of treatment area. Each bait point should equal about 0.25 to 0.50 grams of product. A spot approximately 3 mm or 1/8 inch in diameter equals 0.25 grams of product, while a spot approximately 6 mm or 1/4 inch in diameter equals 0.50 grams of product.

For ants, place several bait points as close as possible to the site of actual or suspected activity.

APPLICATION IN ALL EXCEPT FOOD/FEED HANDLING AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS: For treatment in residential and the non-food/non-feed areas of institutional, warehousing and commercial establishments, place bait into cracks and devices, holes, pipe chases, undersides of furniture, under drain plates, in or under trash containers, hidden surfaces around sinks and storage areas, behind baseboards, around doors and windows, inside, behind and under cabinets, drawers and shelving, under and behind appliances such as stoves, and refrigerators and in attics and crawl spaces. Also apply in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases and crawl spaces where insects hide. Care should be taken to avoid depositing the product onto exposed surfaces. During follow-up visits inspect bait placements and reapply when necessary. Care should be taken to avoid depositing gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface. This product may also be used in food/feed areas of food/feed handling establishments as outlined below.

Non-food/feed areas are 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).

APPLICATIONS IN FOOD/FEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS:

Application within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment only. Apply TC 93A directly into cracks and crevices. Apply small amounts of gel (up to 1/2 gram) per point. Do not apply bait to areas where food utensils or food processing surfaces may become contaminated. Do not apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation and prepared food holding surfaces as bait may be removed by washing. Care should be taken to avoid depositing gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface. Food /feed areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas are also considered food/feed areas when food is exposed and facility is in operation. Apply bait in small amounts between different elements of construction, between equipment and floors, openings leading into voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, behind and under refrigerator, cabinets, sink, closets, stoves and other equipment where cockroaches hide. During follow-up visits inspect bait placements and reapply when necessary.

Application of this product in food/feed areas of food/feed handling establishments other than as a crack and crevice treatment is not permitted. Do not treat food preparation surfaces.

OUTDOOR USE: Use for control of cockroaches and ants. Inject into cracks and crevices around windows and doors, porches, screens, eaves, patios, garages, under stairways and in open crawl spaces and other areas where pests may be nesting or trailing, such as tree holes and cracks in fences.

STORAGE & DISPOSAL: Do not puncture or incinerate. Do not contaminate water, food or feed by storage or disposal.

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: Replace cap and discard container in trash, sanitary landfill or by other approved state and local procedures. Do not incinerate or puncture.

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

CAUTION

~~Harmful if absorbed through the skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.~~

Wash hands and exposed skin before eating, drinking or smoking and after handling. Wash all

6096

contaminated clothing thoroughly before reuse.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

PRECAUTIONS: Do not use on or contaminate fruit, vegetables or other food or feed crops.

Do not apply to humans, animals, clothing or bedding.

Do not contaminate feed or food products or food preparation surfaces, dishes, kitchen utensils and food containers.

To prevent staining, exposed bait should be cleaned up immediately with a damp cloth or sponge.

PHYSICAL OR CHEMICAL HAZARDS: Contents under pressure. Do not puncture or incinerate container. Do not use or store near heat or open flame. Exposure to temperatures above 130°F may cause bursting. Do not treat directly into any electronic equipment such as radios, televisions, computers, etc. Do not treat where electrical short circuits might result.

A Prescription Treatment® brand insecticide from
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Ind. Blvd.
St. Louis, Missouri 63122

Copyright, 1997