

PM03

499-417

9/2/99

1083

United States Environmental Protection Agency

Mr. Steven Weiss
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Blvd.
St. Louis, MO 63122-6682

SEP 2 1999

- Subjects:**
- 1.) Label amendment - added "For Commercial Use Only" - Made CLI revisions including changing the statement of practical treatment to First Aid, and changing Inert ingredients to other ingredients as per PR Notice 98-10.
 - 2.) CSF amendment. Adding additional suppliers for pyrethrin and piperonyl butoxide. Adding petroleum distillates for dilution when using Kenya PY board as supplier for pyrethrins. Replaced "Extremely Flammable" with $\leq 20^\circ$ F. in column 9, product is in the extremely flammable category. "Added additional information in upper left-hand corner of CSF (for easier tracking and reviewing).
 - 3.) Resubmitting alternate formulation #1 form CSF amendment dated 06/30/99 request to discard alternate formulation #1 submitted with the 06/30/99 amendment and replace with corrected CSF.

Product Name: Whitmire PT 505 XLO Inspector
EPA Reg. No. 499-417
Submissions Dated: 06/07/99, 06/30/99, 07/21/99 respectively

Dear Mr. Weiss,

1. Amendment # 1 referenced above: The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. **Five copies of the finished labeling must be submitted prior to releasing the product for shipment.**

a. With regards to the statement "For Commercial Use Only": This language has been reserved by the Agency for identifying residual concentrate insecticides with indoor use directions. These concentrated pesticides are intended for further dilution for indoor use by homeowners, or pest control operators (PCOs). The Agency has required this labeling on dilutable residual concentrates because of: 1.) improper measuring tools, such as cups or spoons that are ordinarily used for food preparation, 2.) incorrect dilution that can result in overexposure, 3.) improper storage of the diluted product, such as in an empty milk carton, for reasons of economy and convenience, 4.) labeling--if any--is likely inadequate, and 5.) improper sprayers or other applicators for indoor use. These situations could result in increased exposure and adverse effects. The concentrate container may require an additional empty, but, labeled container to be used for preparing and storing the diluted product. The labeling for each container must also include text stating that it is to be used only for dilution of the concentrate. Whitmire PT 505 XLO Inspector has been packaged as a "Ready-to-Use" (RTU) aerosol product **not** requiring further dilution, and unless Whitmire can demonstrate that this product is intended to be diluted, and that there is a potential for increased exposure

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGBKEN							
DATE ▶	Sep 2, 1999							

or adverse effects, this language cannot be used with your proposed labeled product.

b. The Consumer Labeling Initiative (CLI) revisions including changing the statement of practical treatment to First Aid, and changing Inert ingredients to other ingredients as per PR Notice 98-10 are acceptable.

2. Ammendments #2 & 3 referenced above: The Agency has reviewed your Basic and Alternate Confidential Statements of Formula (CSF's) submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable. These CSF's have been added to the registration file for the aforementioned product .

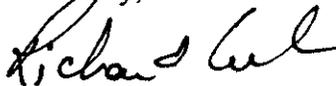
3. In reviewing the registration jacket # 499-417, the original Section 3 registration letter issued by the Agency on May 2, 1995 stated the following:

3. Submit two copies of the revised final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

The above referenced Agency file jacket for Registration No. 499-417, does not contain a final printed label, as required in the May 2, 1995 letter. This product is therefore subject to cancellation in accordance with FIFRA 6(e). Whitmire may easily submit final printed labels by notification and PR Notice 98-10. If you have any questions regarding this letter, please contact Richard Gebken of my team at (703) 305-6701.

Sincerely,



Marion Johnson
Product Manager 10
Insecticide Branch
Registration Division (7505C)

Enclosure

3 of 3

PRECAUTIONARY STATEMENTS

FIRST AID

IF SWALLOWED: Call a physician or Poison Control Center immediately. Gastric lavage is indicated if material was taken internally. Do not induce vomiting. Vomiting may cause aspiration pneumonia.

IF INHALED: Remove patient to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected skin areas with soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Do not remain in treated area and ventilate the area after treatment is completed. Avoid breathing of vapor. Avoid contact with skin, eyes, or clothing. Wash thoroughly after using and before smoking or eating. Do not contaminate water, food, or foodstuffs. Remove all pets and birds. For aquariums, remove or cover and turn off air pumps (if conditions permit).

IN HOSPITALS: Remove patients prior to treating the facility. Ventilate area for two hours prior to returning patients.

FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS: Foods should be removed or covered during general volumetric treatment. After general volumetric treatment, all food processing surfaces and equipment should be thoroughly washed with an effective cleaning compound followed by a potable water rinse before using. Careful Crack and Crevice[®] application for inspection purposes is permissible at all times. In food handling establishments, do not apply as a space spray while food processing is underway.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Extremely Flammable. Contents under pressure. Keep away from heat, sparks, and open flame. Do not use this product in electrical equipment (where there is exposed wiring or contact points) due to possibility of short circuits and shock hazard. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Do not spray on plastic, painted, or varnished surfaces or directly into any electronic equipment such as radios, televisions, computers, etc.

For best results, product should be used when can temperature is above 60°F. If can temperature is below 60°F, store at room temperature until a temperature above 60°F is reached.

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



Whitmire PT[®] 505 XLO

INSPECTOR[®]

Contact Insecticide

For Commercial Use Only.

This product is recommended for use as an aid for inspections, to determine the presence of insects, their locations and an indication of the size and distribution of the infestation.

FOR USE IN AND AROUND: Campgrounds, Food Storage Areas, Homes, Hospitals, Hotels, Food Processing Plants, Nursing Homes, Resorts, Restaurants and other Food Handling Establishments, Schools, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains, Trucks and Planes), Utilities, Warehouses, and other Commercial and Industrial Buildings.

* Do not use in aircraft cabins.

ACTIVE INGREDIENTS:

Pyrethrins 0.5%
Piperonyl Butoxide, Technical[®] 1.0%
n-Octyl Bicycloheptene Dicarboximide 1.0%

OTHER INGREDIENTS:

..... 97.5%
* Equivalent to 0.8% (Butylcarbitol)(6-Propylpiperonyl) Ether and 0.2% Related Compounds

EPA Reg. No. 499-417 EPA Est. No. 499-MO-1

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panel for additional precautionary statements.

NET WEIGHT: 6 oz.



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

KILLS: Angoumois Grain Moths, Ants, Bed Bugs, Booklice, Carpet Beetles, Centipedes, Chocolate Moths, Cigarette Beetles, Clothes Moths, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Drug Store Beetles, Fleas, Flies, Fruit Flies, Gnats, Grain Moths, Granary Weevils, Horn Flies, House Flies, Indian Meal Moths, Mediterranean Flour Moths, Millipedes, Mosquitoes, Mud Daubers, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Silverfish, Small Flying Moths, Sowbugs, Spiders, Stable Flies, Ticks and Wasps.

DIRECTIONS FOR USE

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

HOW TO USE INSPECTOR[®]: Use INSPECTOR[®] with the specified actuator, injection tubes or other Whitmire Micro-Gen equipment. Do not use in aircraft cabins.

CRACKS, CREVICES AND CLOSED VOIDS

Inject INSPECTOR[®] into cracks and crevices or closed void areas where insects may be harboring, living or breeding. For cracks, crevices, holes and other small openings, inject approximately one second of product. For closed voids, calculate the void's cubic volume and treat at the rate of five to ten seconds per three cubic feet. For inaccessible voids, drill small holes and inject product. Several holes may be required in long-running voids. Insects that are contacted will be flushed from their harborage sites.

DIRECTED CONTACT

Direct INSPECTOR[®] into open void areas in and/or around equipment, stored items, stores, cabinets, cooking equipment, washers, dryers and refrigerators. Other areas that may be inspected are void areas around stored food, cleaning supplies, attics and crawl spaces. Directed contact applications may be made in these sites. For directed contact applications, release 1 to 3 seconds of product per inspection site. Insects that are contacted will be flushed from their harborage sites. For directed contact applications on exposed surfaces, apply INSPECTOR[®] from a distance of at least 16 inches. Repeat as necessary.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool area away from heat or open flame.

PESTICIDE DISPOSAL: Waste resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

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.

A Prescription Treatment[®] brand insecticide from:

Whitmire Micro-Gen Research Laboratories, Inc.
3563 Free Court Industrial Blvd.
St. Louis, MO 63122-6682
www.wmrg.com

© 1999 Whitmire Micro-Gen Research Laboratories, Inc.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

SEP 2 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
499-417