



000499-00437-051999

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Systems Integration Group, Inc.

PM03

499-437

5/19/99

1 of 6

United States Environmental Protection Agency

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

MAY 19 1999

Dear Mr. Moran:

Subject: Label Amendment, Response to PRN 98-6
Whitmire Preclude® PT 2120 TR
EPA Reg. No. 499-437
Your Submission Dated February 11, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

Based on the fact that your product is intended for commercial greenhouse use, and on the information you provided in your letter dated February 9, 1999, we will agree to most of your proposed deviations from the requirements of PR Notice 98-6. Given the calculations in the attachment to your letter, we agree that an explosion resulting from applying the product in a greenhouse is unlikely, even if an ignition source is present. However, as discussed with Mr. Jonathan Berger of your staff on April 7, 1999, in lieu of requiring that all sources of ignition be turned off, we are requiring a label statement instructing the handler during application to maintain a distance of at least 10 horizontal feet between the product and any potential source of ignition (comment 11 below). Due to the potential fire hazard should a fogger be activated in close proximity to an ignition source.

Label changes:

1. On the Primary label the sections entitled "Personal Protective Equipment" ,"Applicators and Other Handlers Must Wear" should be inside of the Agricultural Use Requirements box. The PPE for early entry should be placed immediately after the REI statement.
2. Revise the fourth sentence under PREAPPLICATION DIRECTIONS to read as follows: "All human occupants and pets must be removed before treatment."
3. Revise the fifth sentence under PREAPPLICATION DIRECTIONS to read as follows: "Greenhouse must be ventilated according to the requirements of the Worker Protection Standard before reentry."

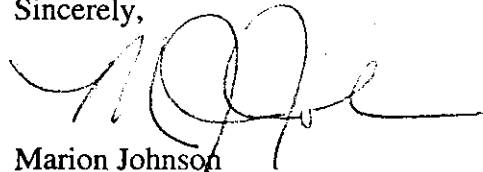
CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGEBKEN							
DATE ▶	May 10, 1999							

4. Please provide information in the DIRECTIONS FOR USE to enable the user to determine when an application of this product is indicated (e.g., pest population or plant damage); a recommended frequency of application; and when retreatment is indicated.
5. Revise the header below the Agricultural Use Requirements Box to read: "FOR USE IN GREENHOUSES ON:".
6. Under ENVIRONMENTAL HAZARDS revise the first sentence to read: "This product is highly toxic to fish and aquatic invertebrates."
7. Near the beginning of the DIRECTIONS FOR USE section, above the Agricultural Use Requirements box, insert the following statements: "Do not apply this product in a way that will contact workers of other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation."
8. In the DIRECTIONS FOR USE, insert the following statement: "Do not place cans within 10 horizontal feet of any ignition source such as pilot lights, other open flames, or running electrical appliances that cycle off and on."
9. The rationale for determining the flash point was calculated volumetrically (assuming a 2 foot height and no air flow worst case scenario), but your label use rate is expressed as "2 ounce cans/1500 square feet" maximum application rate. All greenhouses exceed a height of 2 feet, and you are proposing not to restrict air flow, therefore, the label should be modified to correctly reflect the total amount to be used/cubic feet, as calculated in the supporting rationale. Greenhouses (with non-restricted air flow) vary considerably in height, and a total volumetric expression for a commercial product is more accurate calculation for determining application rates, thus minimizing any possible misuse for an explosion hazard as calculated in the supporting rationale.

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
 000499-00437 S527693.wpd

Whitmire
PT[®] 2120 TR
Preclude[®]

Supplemental Label

FOR USE IN: Greenhouses

KILLS: Aphids, Caterpillars, Cutworms, Leafminers, Mealybugs, Mites, Scale, Thrips, Weevils and Whiteflies.

MAY BE USED ON: Bedding Plants, Cut Flowers, Flowering Hanging Baskets, Foliage, Potted Flowering Plants and Ornamentals

Recommended for Commercial Use Only

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

MAY 19 1999

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

499-437

ACTIVE INGREDIENTS:

Fenoxycarb 4.8%

OTHER INGREDIENTS: 95.2%

EPA Reg. No. 499-437 EPA Est. No. 499-MO-1

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching the back of the throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

See page 3 for additional Precautionary Statements.

A Prescription Treatment[®] brand Insecticide from:
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Free Court Industrial Blvd.
St. Louis, MO 63122-6682
www.wmmg.com

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

346

426

112 X 312 10/18/94



body length 5.582
coating, & varnish limits 5.442
type limits 5.302

Whitmire PT 2120 TR Preclude®

Treats Up To 3,000 Square Feet

FOR USE IN: Greenhouses

KILLS: Aphids, Caterpillars, Cutworms, Leafminers, Mealybugs, Mites, Scale, Thrips, Weevils and Whiteflies.

Recommended for Commercial Use Only.

ACTIVE INGREDIENTS:

Fenoxycarb 4.8%

OTHER INGREDIENTS: 95.2%

EPA Reg. No. 499-437 EPA Est. No. 499-MO-1
KEEP OUT OF REACH OF CHILDREN

CAUTION

See supplemental label for additional Precautionary Statements.

NET WEIGHT: 2 oz.



DIRECTIONS FOR USE

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

See supplemental label for complete Directions for Use.

TOTAL RELEASE DOSAGE: Whitmire PT® 2120 TR contains an insect growth regulator. Initially two applications should be made one week apart. Additional applications should be applied as necessary, but no more than once per week.

Use one 2 oz. can per 3,000 square feet. In situations where insect control is difficult due to tough to control insects or high crop density, it is permissible to use one 2 oz. can for 1,500 - 3,000 square feet. For smaller greenhouses between 1,500 - 3,000 square feet, use one 2 oz. can.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to supplemental labeling and/or Agricultural Use Requirements in the Directions for Use section of the supplemental label for information about this standard.

PHYSICAL OR CHEMICAL HAZARDS

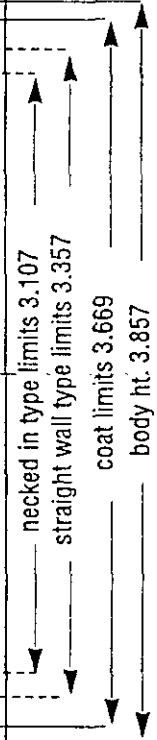
Extremely Flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully.



Highly Flammable Ingredient
Ingrediente Altamente Inflamable

A Prescription Treatment® brand insecticide from:
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Industrial Blvd., St. Louis MO 63122-6682
www.wmrg.com
© 1998 Whitmire Micro-Gen Research Laboratories, Inc.

PT 2120 2oz. Container Label 1/99



Soft

PT 2120 6oz. Container Label 1999

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance selection chart.

APPLICATORS AND OTHER HANDLERS MUST WEAR: Long-sleeved shirt and long pants, chemical resistant footwear plus socks, and Chemical-resistant gloves (Such as nitrile, Butyl, Neoprene and/or Barrier Laminate or PVC or Viton). Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using toilet.
- Remove clothing 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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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

Extremely Flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully.



Highly Flammable Ingredient
Ingrediente Altamente Inflamable

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



A Prescription Treatment® brand insecticide from:
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www.wmmg.com

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Whitmire
PT 2120 TR
Preclude®

TREATS UP TO 9,000 SQUARE FEET.

FOR USE IN: Greenhouses

KILLS: Aphids, Caterpillars, Cutworms, Leafminers, Mealybugs, Mites, Scale, Thrips, Weevils and Whiteflies.

MAY BE USED ON: Bedding Plants, Cut Flowers, Flowering Hanging Baskets, Foliage, Potted Flowering Plants and Ornamentals

Recommended for Commercial Use Only

ACTIVE INGREDIENTS:

Fenoxycarb 4.8%

OTHER INGREDIENTS: 95.2%

EPA Reg. No. 499-437

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

DIRECTIONS FOR USE

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

See supplemental label for complete Directions for Use. **TOTAL RELEASE DOSAGE:** PT® 2120 TR Preclude® contains an insect growth regulator. Initially two applications should be made one week apart. Additional applications should be applied as necessary, but no more than once per week.

Use one 6 oz. can per 9,000 square feet. In situations where insect control is difficult due to tough to control insects or high crop density, it is permissible to use one 6 oz. can for 4,500-9,000 square feet. For smaller greenhouses between 4,500-9,000 square feet, use one 6 oz. can.

TO ACTIVATE CANS: Start with can farthest away from exit door. Activate each can by pressing tab down and locking it. Leave greenhouse at once. The entire contents will release automatically.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to supplemental labeling entitled Agricultural Use Requirements in the "Directions for Use" section of the supplemental label for information about this standard.

PRECAUTIONARY STATEMENTS

FIRST AID

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists. **IF ON SKIN:** Wash with plenty of soap and water. Get medical attention. **IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching the back of the throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Do not contaminate water, food, food stuffs or feed. Remove all pets. Cover fish tanks or remove. Wear long-sleeved shirt and long pants, socks and shoes and chemical resistant gloves (such as nitrile, Butyl, Neoprene, and/or Barrier Laminate).



PT® 2120 TR Preclude®

DIRECTIONS FOR USE

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

PREAPPLICATION DIRECTIONS: For best results, apply during early evening when foliage is dry and temperature is between 60°-80°F. Shut off all exhaust fans and close all windows, doors and ventilators. Keep greenhouse closed for four hours, preferably overnight, following treatment. All human occupants and pets should be removed before treatment. Greenhouse should be ventilated before reentry.

TOTAL RELEASE DOSAGE: PT® 2120 TR Preclude® contains an insect growth regulator. Initially two applications should be made one week apart. Additional applications should be applied as necessary, but no more than once per week.

Use one 2 oz. can per 3,000 square feet. In situations where insect control is difficult due to tough to control insects or high crop density, it is permissible to use one 2 oz. can for 1,500 - 3,000 square feet. For smaller greenhouses between 1,500 - 3,000 square feet, use one 2 oz. can.

Use one 6 oz. can per 9,000 square feet. In situations where insect control is difficult due to tough to control insects or high crop density, it is permissible to use one 6 oz. can for 4,500 - 9,000 square feet. For smaller greenhouses between 4,500 - 9,000 square feet, use one 6 oz. can.

TO ACTIVATE CANS: Start with can farthest away from exit door. Activate each can by pressing tab down and locking it. Leave greenhouse at once. The entire contents will release automatically.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during restricted entry interval (REI) of 12 hours.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: Coveralls, Chemical-resistant gloves, such as Barrier Laminate or Butyl Rubber or Nitrile Rubber or Neoprene Rubber or PVC or Viton, Shoes plus socks.

FOR USE INDOORS ON, BUT NOT LIMITED TO:

Bedding plants (such as): impatiens, marigolds, petunias, geraniums, and garden mums.

Cut flowers (such as): roses, chrysanthemums, carnations, snapdragons, and orchids.

Flowering hanging baskets (such as): fuchsia, lantana, New Guinea impatiens, ivy, and geraniums.

Foliage (such as): Boston fern, dracaena, ficus, schefflera, and philodendron.

Potted flowering plants (such as): poinsettia, chrysanthemums, florist's azaleas, lilies, African violets, geraniums, hibiscus, kalanchoes, and begonias.

Ornamentals (such as): azalea, barberry, coloneaster, euonymus, holly, juniper, oak, pine, rhododendron, roses, spiraea, spruce, viburnum and yew.

This product has been tested on a wide variety of plants and in our opinion has demonstrated excellent plant safety. However, not all varieties or strains of the plants listed have been tested. Unintentional consequences such as crop injury or ineffectiveness may result because of certain environmental or growing conditions, manner of use or application, and insect resistance. Therefore, before treating a large number of plants, spray a few plants and observe for plant damage and for performance prior to full scale application.

PLANT SAFETY NOTICE: Good greenhouse management must overrule the use of this product when any conditions might be created by tightly closing greenhouses that would harm plant foliage or flowers. Example: Creation of high temperatures or humidity conditions. Do not use this product in greenhouses with unvented or defective gas heating systems or when open combustion exists.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry place away from heat or open flame.

PESTICIDE DISPOSAL: Wastes 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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Do not contaminate water, food, food stuffs or feed. Remove all pets. Cover fish tanks or remove. Wear long-sleeved shirt and long pants, socks and shoes and chemical resistant gloves (such as nitrile, Butyl, Neoprene, and/or Barrier Laminate).

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance selection chart.

APPLICATORS AND OTHER HANDLERS MUST WEAR: Long-sleeved shirt and long pants, chemical resistant footwear plus socks, and Chemical-resistant gloves (Such as nitrile, Butyl, Neoprene and/or Barrier Laminate or PVC or Viton). Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using toilet.
- Remove clothing 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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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

Extremely Flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully.



Highly Flammable Ingredient
Ingrediente Altamente Inflamable

ADDITIONAL PRECAUTIONS: Contents of container must be at room temperature before use. Therefore, cans must be stored at room temperature (above 65°F) for 24 hours before application. Make sure spray is unobstructed above units by foliage or other physical objects in order to obtain maximum distribution of fog.

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



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