

JAN 23 1997

Mary Ellen Summers
Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Ind. Blvd.
St. Louis, MO 63122

Dear Ms. Summers:

Subject: Amended Product Labeling
ULD BP-100 Insecticide
EPA Registration Number 499-452
Submission Dated January 6, 1997

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 comment listed below:

1. You are reminded that the Agency has issued Pesticide Regulation Notice 96-6 ("Pet Pesticide Product Label Statements"). The Directions for Use on this product label include instructions for treating dogs. All products released for shipment by registrants after October 1, 1998 should bear labeling that is consistent with this notice.
2. Under the Directions for Use in Federally Inspected Meat and Poultry Establishments, insert the phrase "for at least one hour" after the phrase "Leave room closed".
3. Under the Directions for Use using Truck Mounted Equipment, correct "tree" to read "three".
4. Move the Statements of Practical Treatment to appear after the Precautionary Statements.

A stamped copy of the label is enclosed for your records.

If you have any questions or comments, please contact me at (703) 305-6788.

Sincerely yours,

RPK

Richard P. Keigwin, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division

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ULD BP-100 INSECTICIDE

For Indoor or Outdoor application as a space, area or contact spray. Dependent upon insects to be controlled and the area to be treated, this product may be applied through mechanical aerosol or Ultra Low Volume (ULV) generators such as Micro-Gen equipment, as well as thermal and conventional fogging or spraying equipment.

For use in Restaurants, Cafeterias, Food service storage and preparation areas, Grocery and convenience stores, Motels, Hotels, Health care facilities, Schools, Universities, Apartments, Dormitories and Office Buildings.

(See back panel for additional use sites)

Active Ingredients:

Pyrethrins	1.00%
Piperonyl Butoxide, technical	2.00%
N-octyl bicycloheptene dicarboximide	2.94%

Inert Ingredients: 94.06%

Contains Petroleum Distillate

*consists of 1.60% (butylcarbityl) (6-propylpiperonyl) ether and 0.40% related compounds.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel for Additional Precautionary Statements and Statement of Practical Treatment

Whitmire Micro-Gen Research Laboratories, Inc.
3568 Tree Court Ind. Blvd.
ST. Louis, MO 63122, USA

EPA Reg. No. 499-452
EPA Est. No. 499-MO-1

Net Contents:

Ultra Low Dosage Through Micron Generation
Not for sale in California

ACCEPTED
WITH COMMENTS
in EPA Letter Dated

JAN 23 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, this pesticide
registered under EPA Reg. No.
499-452

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

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected person. Do not enter treated areas without protection until thoroughly ventilated or sprays have dried. Use a respiratory device as recommended by NIOSH/MSHA for protection against organic vapors and pesticides.

ULD BP-100 insecticide is effective control against the following insects when following label directions: Roaches, Ants, Waterbugs, Spiders, Earwigs, Boxelder Bugs, House Flies, Crickets, Fruit Flies, Gnats, Wasps, Mosquitoes, Caddisflies, Confused Flour Beetles, Cheese Mites, Cigarette Beetles, Granary Weevils, Indian Meal Moths, Angoumois Grain Moths, Tobacco Moths, Rice Weevils. (See back panel for additional insects)

Do not apply directly to food, Do not apply while food processing is underway. Cover or remove any exposed food. Cover equipment which comes in direct contact with food, and cannot be cleaned and rinsed after application. After spraying in meat packaging plants, bakeries, and other food processing plants, wash all equipment where exposed food will be handled with an effective cleaning compound followed by a potable water rinse. In the home, all food processing surfaces, dishes and utensils should be covered during treatment, or thoroughly washed before use.

Indoor Space Application - Flying Insects. Use to kill flies, mosquitoes, gnats and small flying moths.

Use full strength or dilute product as desired according to dilution table listed below. Close doors, windows and shut off all ventilating equipment. Then with a mechanical aerosol generator (no droplets over 50 microns in diameter and 80% less than 30 microns) apply undiluted product at a dosage rate of approximately one (1) fluid ounce per 1,000 cubic feet of room space or, when applying diluted product, apply at the rate of 1-2 fluid ounces per 1,000 cubic feet of room space. Direct spray toward upper areas of room. Do not remain in treated areas after application, and leave room closed for at least one (1) hour. Ventilate thoroughly before occupants are allowed to re-enter. Repeat application as necessary for control.

Dilution: Use a white mineral oil conforming to regulation 21 CFR 178.3620 (b), or an odorless light petroleum hydrocarbon conforming to 21 CFR 172.882 or 40 CFR 180.1001 (c) & (e). Combine oil and BP-100 as directed below and mix well just prior to application.

Active % Desired	Mixture	Application Rate (1,000 cu. ft.)
0.50%	1 part concentrate to 1 part oil	1 oz.
0.30%	1 part concentrate to 2 ^{1/3} parts oil	1-2 oz.
0.15%	1 part concentrate to 5 ^{2/3} parts oil	1-2 oz.

Indoor Space Spray & Directed Spray Application - Crawling Insects.

Use to kill roaches, silverfish, waterbugs, earwigs, ants, spiders and beetles in their harborage situations. Use product full strength or diluted as desired and apply through equipment which can deliver a pin stream spray. direct a pin stream spray into all cracks and crevices in woodwork, walls, floors, underneath sinks, behind pipes and in all places where these insects harbor. Contact as many insects as possible with the spray. Do not allow spray to contact stored food. Then, with a mechanical aerosol generator (no droplets over 50 microns in diameter and 80% less than 30 microns) apply undiluted product at the rate of one (1) ounce per 1,000 cu. ft. or space. Close doors, windows and shut off all ventilating equipment before application. Leave room closed for at least one (1) hour after application. Do not remain in treated areas and ventilate thoroughly before occupants are allowed to re-enter. Repeat application as required.

Federally Inspected Meat and Poultry Establishment. Apply as a space or directed contact spray for control of flies, mosquitoes, gnats, small flying moths, roaches, silverfish, waterbugs, earwigs, ants, and spiders in establishments operating under the Federal meat, poultry, shell egg grading and egg products inspection program. Do not apply while food processing is underway. cover equipment which comes in direct contact with food, and cannot be cleaned and rinsed after application. Close doors, windows and shut off all ventilating equipment prior to application. when using ULV (Ultra Low Volume) equipment such as a Micro-Gen ULV Spray, adjusted to deliver aerosol droplets (30 microns or less), apply one (1) ounce per 1,000 cu. ft. of space. Leave room closed for after application and ventilate before occupants are allowed to re-enter. Before processing resumes, wash down all equipment, benches, shelving (etc.) exposed to application and where food will be handled, with an effective cleaning compound. Follow with a potable water rinse.

Deep Void Crack and Crevice Application - to flush and kill insects harbored in deep voids and behind cracks and crevices.

Spot Application:

With equipment designed for deep void Ultra Low Volume (ULV) applications follow the manufacturer's recommendations for proper equipment set up and operating pressures. Place the tip of the applicator at or into the crack and crevice to be treated. Apply

product in short bursts while keeping tip in position. Allow the air stream to push insecticide deep into voids. Repeat application as necessary to flush insects from voids. Avoid applying to the point of runoff or drip. Ventilate thoroughly before occupants are allowed to re-enter.

Linear application along baseboards, trim molding, etc.: With equipment designed for deep void ULV application, move applicator tip along the crevice to be treated applying a constant burst of insecticide. Move the tip at a steady rate of approximately one (1) foot per second. Avoid applying to the point of runoff or drip. Repeat application as necessary to flush insects from the void. Ventilate thoroughly before occupants are allowed to re-enter.

Outdoor Ground Fogging Application: Use to kill flies, mosquitoes and gnats in open areas near buildings and in campgrounds. Use preferably at a time when temperature is cool (75°F or less) and the wind velocity is approximately five (5) MPH or less.

Handheld Equipment - when using equipment such as Micro-Gen ULV equipment, apply at the rate of 4.0 ounces per acre. Figure application travel path for a coverage of a fifty (50) foot swath. Allow spray drift to penetrate dense foliage. Repeat application as required for control.

Truck Mounted Equipment - when using Micro-Gen or similar truck mounted ULD equipment, spray at a dosage rate of fifteen (15) ounces per minute from a location up-wind of the areas where insects are to be controlled. keep speed of vehicle to approximately five (5) MPH. Figure application travel path for a coverage of a tree hundred (300) foot swath. Repeat application as required for control.

For Use on Animals: Dilute one (1) part concentrate to 1 part oil and mix well. to control horn flies, house flies, mosquitoes and gnats around beef and dairy cattle, horses and dogs, apply a light mist sufficient to wet the tips of the hair. To control stable flies, horse flies and deer flies on beef and dairy cattle and horses, apply 2 ounces per adult animal, sufficient to wet the hair but not to soak the hide. Repeat treatment once or twice daily or at sufficient intervals to give continued protection. To control the motile stages of blood sucking lice on beef and dairy cattle, apply the spray to thoroughly wet the hair. Use 2 ounces or less per animal and repeat every 2 to 3 weeks as required.

ULD is a trademark of Micro-Gen Equipment Corp.

Precautionary Statements

Hazards to Humans and Domestic Animals

Caution: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling. Remove pets, birds, and cover fish aquariums and turn

off air pump motor before spraying. In health care facilities, remove patients prior to treatment. Thoroughly ventilate treated area for two hours before returning patients.

Environmental Hazards: This product is toxic to fish. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

Physical and Chemical Hazards: Do not use or store near heat or open flame. Note: Some furniture finished and particularly plastics can be damaged by petroleum based insecticides. To avoid damage, cover those items and do not spray directly. If in doubt, test by applying this material to an inconspicuous area before spraying.

Storage and Disposal

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

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: One Gallon and Under; Do not reuse empty container. Wrap and put in trash. Over one Gallon; Triple rinse (or equivalent). Then offer for recycling or reconditions, or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities.

Statement of Practical Treatment

If swallowed - Contains petroleum distillate. Call a physician or poison control center immediately. Do not induce vomiting - vomiting may cause aspiration pneumonia.

If inhaled - Remove victim to fresh air. If not breathing give artificial respiration, preferably by mouth-to-mouth. Get medical attention.

If on skin - Remove contaminated clothing and wash promptly with soap and water. Get medical attention if irritation persists.

If in eyes - Flush eyes with plenty of water. Call a physician if irritation persists.