

499-498

05-18-2012

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 18, 2012

Ms. Dana M. Thomas  
Whitmire Micro-Gen Research Laboratories, Inc.  
3568 Tree Court Ind. Blvd.  
St. Louis, MO 63122

Subject: Amended Reregistration Label  
Product Name: Prescription Treatment® brand BP-2000  
EPA Registration Number: 499-498  
EPA Decision Number: 411636

Dear Ms. Thomas:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the **Pyrethrin RED** and has concluded that your submission is acceptable.

NOTE: This product is **not** being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself, and can be added by non-notification per PRN 98-10.

Please note that the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSFs are superseded.

- Basic CSF, dated 12/1/2010
- Alternate CSF, dated 12/1/2010

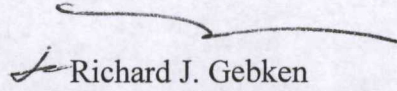
A copy of your label stamped "Accepted" is enclosed along with copies of the acute toxicity and product chemistry reviews completed for the subject product. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).



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If you have any questions about this letter, please contact either Linda Arrington at (703) 305 6249 or via e-mail at [Arrington.Linda@epa.gov](mailto:Arrington.Linda@epa.gov).

Sincerely yours,

  
Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7505P)

Enclosures: Label stamped "Accepted," dated 5/18/2012  
Response to Rebuttal by Dr. Byron Backus, dated 5/1/12



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# Prescription Treatment® brand BP-2000

AN INSECTICIDE FOR MANUFACTURING USE ONLY • NOT FOR RESALE UNDER THIS LABEL  
Environmentally Hazardous Substances, Liquid, N.O.S., (Pyrethrum Extract 20%), 9, UN3082, PGIII, RQ

**ACTIVE INGREDIENT:**

Pyrethrins..... 20.0%

**OTHER INGREDIENTS\*:**..... 80.0%

\*Contains Petroleum Distillates TOTAL: 100.0%

## KEEP OUT OF REACH OF CHILDREN WARNING

EPA Reg. No. 499-498 • EPA Est. No. 7969-MO-1

NET CONTENTS: 55 gallons

### PRECAUTIONARY STATEMENTS

**ACCEPTED**  
MAY 18 2012  
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. ~~499-498~~

#### FIRST AID

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 – 20 min. Call a poison control center or doctor for treatment advice.

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

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. 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.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-832-HELP or the National Pesticide Information Center at 1-800-858-7378.

**NOTE TO PHYSICIAN:** Contains petroleum distillate – vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**WARNING:** Causes skin irritation and moderate eye irritation. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear long-sleeved shirt and long pants, socks, shoes and gloves when handling. Remove contaminated clothing and wash clothing before reuse.

#### ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment wash-waters.

#### PHYSICAL AND CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

#### DIRECTIONS FOR USE

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

Formulators using this product are responsible for obtaining EPA registration of their formulated products. Mix well in drum before sampling and use.

- Only for formulation into an insecticide for the following use(s): Domestic Indoor (household); Domestic Outdoor (perimeters, lawns & ornamental and vegetable gardens); Commercial/Industrial/Institutional Food/Feed & Non-Food/Feed Areas (indoor & outdoor);



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Treatments of Animals (including livestock & pets) and Terrestrial Food/Feed and Non-Food/Feed; Aquatic Non-Food; Greenhouse Food & Non-Food

- Not for formulation into wettable powder end use products (EUP), unless the EUP is packaged in water soluble bags.
- Not for formulation into granular EUPs.
- This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

#### Direct Application to Non-Domestic Animals/Livestock

Formulated products eligible for reregistration may not contain a percentage of active ingredient (ai) that exceeds the following:

Dusts for application to livestock only – 1.0% ai  
 Liquids for application to livestock only – 0.035 lb ai/gal  
 Towelettes for application to livestock only – 0.2% ai  
 Spot-on application – 1.0% ai  
 Liquids for applications to poultry only – 0.01% ai

#### Pet Care

Formulated products eligible for reregistration may not contain a percentage of active ingredient (ai) that exceeds the following:

Shampoos – 0.3% ai  
 Sprays – 0.01% ai  
 Spot-on or Pour-on – 1.0% ai  
 Dust – 1.0% ai  
 Towelettes – 0.2% ai

## STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store indoors in an upright position and in a cool and dry place. Keep container tightly sealed.

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

**CONTAINER DISPOSAL:** Nonrefillable container. Empty container by using the product according to the label directions. Do not reuse or refill this container! Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows:

Empty remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least 1 complete revolution, for 30 sec. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure 2 more times.]

Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

## 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.

Manufactured for:  
 Whitmire Micro-Gen Research Laboratories, Inc.®  
 by BASF Corporation  
 3568 Tree Court Industrial Blvd.  
 St. Louis MO 63122-6682

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