06/09/2003

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United Jates Environmental Protection Agency

Mr. Jeffrey S. Miller, Executive Vice President

Prentiss. Inc.

CB 2000 Floral Park, NY 110012

JUN ' 9 2003

Subject:

Response to Agency letter dated an application for amendment and subsequent

email communications dated January 30, and February 5, 2003.

Product:

Prentox Excite R

Registration Number: 655-798 OPP Identifier Number: 284505

Dear Mr. Miller,

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.

- 1. Remove the following statements: "✓NSF" logo, the "NSF Registration No. 072060". and the "NSF Category Code: F1" from the label. The Agency has reviewed the information available (NSF web site, United States Department of Agriculture Food Safety and Inspection Service (FSIS) final Rule dated October 20, 1999 DOCID:fr20oc99-3, and 40 CFR. (Copies of applicable documentation are attached).
 - a. The NSF logo by way of collateral and implied identification is considered a violation of 40 CFR 156.10 (a)(5)(vii) "Any statement directly or indirectly implying that the pesticide or device is recommended or endorsed by any agency of the Federal Government."
 - b. A letter dated March 8, 2002 (available on the internet at the NSF web site and addressed to Prentiss Incorporated states that the NSF nonfood compounds registration program is a continuation of the USDA product approval and listing program, which is based on meeting regulatory requirements, including FDA 21 CFR for appropriate use, ingredient and labeling. In addition, the letter states under what conditions the product may be used within official establishments operating under Federal, meat, poultry, shell egg grading, and egg products inspections programs.

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EPA Form 1320-1 (12-70)

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c. The USDA/FSIS final rule published on October 20, 1999 page 56403 states the following:

"FSIS' review and approval of pesticides and rodenticides prior to their intended use provided some assurance to meat and poultry processors that proper use of these compounds would not result in the adulteration or contamination of food products. However, FSIS has concluded after careful consideration of the issue that this prior approval program is unnecessary and inconsistent with HACCP. Under the HACCP regulations, establishments are responsible for developing and implementing HACCP plans incorporating the controls necessary and appropriate to produce safe meat and poultry products. Consequently, establishments are responsible for ensuring that the pesticides and rodenticides they use are safe and effective. Further, FSIS prior approval of pesticides and rodenticides has been somewhat redundant with the Environmental Protection Agency (EPA) requirements and review programs for these compounds. Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), EPA reviews pesticide formulation, intended use, and other information; registers all pesticides for use in the United States; and prescribes labeling, use, and other regulatory requirements to prevent unreasonable adverse effects on the environment, including humans, wildlife, plants, and property. Any meat or poultry establishment using a pesticide must follow the FIFRA requirements. FSIS is requiring that documentation substantiating the safety of pesticides and rodenticides be available to FSIS inspection program employees for review (Sec. 416.4(c)). The documentation will need to include proof of EPA registration and could also include other any information, such as letters of guaranty from the manufacturer, labels, application instructions, and records of use that establish the safe and effective use of these products. FSIS inspection program employees will review these records as necessary, as well as observe the application and storage of pesticides and rodenticides to ensure the maintenance of sanitary conditions and that product is not adulterated."

The United States Department of Agriculture FSIS therefore, has determined that the approval process for pesticides is redundant and unnecessary. The USDA further acknowledges the EPA reviews pesticide formulations for their intended use and prescribes labeling, use and other regulatory requirements as outlined above.

d. The identify of classification of a product as F1 is known within the FSIS regulated food facilities as permitting a certain use under the USDA previously published "List of Proprietary Substances and Nonfood Compounds" This may

be considered a false and misleading statement as outlined in 156.10.

- 2. Consolidate all Tank mixing instructions of page 2, 3, and 4 to a central location at the beginning of the Directions for Use directly after the statement "It is a violation of Federal Law to use this product in a manner inconsistent with its labeling." In addition, remove the statement "In USDA inspected facilities, tank mix 2.125 fl. ounces of Excite R^{right} with the appropriate amount companion insecticide per finished gallon and apply in accordance with the Directions for Use on the companion label. The majority of the products that were referenced for tank mixing are not permitted for use in food processing/handling areas of either USDA inspected facilities or other food processing operations.
- 3. Based on the email messages and proposed label regarding the product names and registration numbers, use the following names and registration numbers in the far right column of the table below within the Tank Mixing instructions replace the mixed product names as follows:

			Correct the label to the following:	
:Proposed Label Product Names	Reg # provided via email	Agency Official Name:	Change to the following:	
Evercide Esfenvalerate EC	none provided	n/a	remove	
Cynoff EC Insecticide	279-3081	Cynoff EC Insecticide	"Cynoff EC Insecticide #279- 3081"	
Cynoff Power Spray Insecticide	279-3070	Cynoff WP Insecticide	"Cynoff WP Insecticide #279-3070"	
Conquer Advanced Generation Insecticide	1021-1565- 57076	Conquer Residual Insecticide Concentrate	"Conquer Residual Insecticide Concentrate #1021-1565-57076"	
Prelude EC	10182-95	Prelude Termiticide/Insecticide	"Prelude Termiticide/Insecticide # 10182-95"	
Demon EC Insecticide Email provided name: Demon Insectcide	100-1004	Demon EC Insecticide	"Demon EC Insecticide #100- 1004"	
Perm-Up 3.2 EC	70506-9	Perm-Up 3.2 EC	"Perm-Up 3.2 EC # 70506-9"	
Astro Insecticide	279-3149	Astro Insecticide	"Astro Insecticide #279-3141"	
LG Permethrin 3.2 71532-2 Termiticide/Insecticide		LG Permethrin 3.2 Termiticide/Insecticide	"LG Permethrin 3.2 Termiticide/Insecticide #71532-2"	
Unicorn 40% Permethrin 28293-354 EC		Unicorn 40% Permethrin EC	"Unicorn 40% Permethrin EC #28293-354"	

Atroban 11% EC Insecticide	773-59	Atroban 11%	"Atroban 11% EC #773-59"
Prentox Prenbay 1.5EC Email listed as Prentox Penbay.	655-783	Prentox Perm-X 1E	"Prentox Perm-X 1E #655-783"
Prentox Perm-X	655-783	same as above	consolidate same as product directly above. "Prentox Perm-X 1E #655-783"

4. Page 2 within the directions for use, remove the following statement: "The insecticidal components of ExiteR, pyrethrins and piperonyl butoxide, are classified as food additives and established tolerances will not be exceeded when used as directed." This is a false and misleading statement as defined in 40 CFR 156.10. These ingredients are classified as pesticides, and should be identified only as pesticides.

Sincerely,

Marion Johnson Product Manager 10

Insecticide Branch

Registration Division (7505C)

Enclosures 000655-00798 \$635247 wpd





9 2003

Under the Federal Insecticide. Fungicide, and Rodenticide Ast, NSF Category Code: Flas amended, for the pestiside FINSECTS registered under EPA Reg. No.

5/08

*PROVIDES RAPID KNOCKDOWN AND KILL OF INSECTS

*MAY BE TANK-MIXED WITH RESIDUAL INSECTICIDES AND INSECT GROWTH REGULATORS *FOR USE IN GERMAN COCKROACH RESISTANCE MANAGEMENT PROGRAMS

*MAY BE APPLIED AS A WET SPRAY WHILE FOOD PLANTS ARE IN OPERATION *NOT FOR USE ON TURF BEING GROWN FOR SALE OR OTHER COMMERCIAL USE AS SOD, OR FOR COMMERCIAL SEED PRODUCTION, OR FOR RESEARCH PURPOSES.

NSF Registration No. 072060

ACTIVE INGREDIENTS: Pyrethrins *Piperonyl Butoxide, Technical 60.0% **OTHER INGREDIENTS: 34.0% 100.0% *Equivalent to min. 48.0% (butylearbityl)(6-propylpiperonyl) ether and 12.0% related compounds. **Contains Petroleum Distillate PRENTOX® - Registered Trademark of Prentiss Incorporated ExciteR - Trademark of Prentiss Incorporated EPA REG. NO. 655-798 EPA EST. NO. KEEP OUT OF REACH OF CHILDREN CAUTION FIRST AID Have product container or label with you when calling a Poison Control Center or physician, or obtaining treatment. Call a physician, Poison Control Center, or the National Pesticide Information Center at 1-800-858-7378 immediately for treatment advice. Do not induce vomiting unless told to do so by the Poison Control Center or physician. If swallowed Do not give any liquid to person. Avoid alcohol. Do not give anything by mouth to an unconscious or convulsing person. Hold eye open and rinse slowly and gently with water for 15-20 minutes. If in eyes Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a physician, Poison Control Center, or the National Pesticide Information Center at 1-800-858-7378 immediately for treatment advice. If on skin or Take off contaminated clothing. clothing Rinse skin immediately with plenty of water for 15-20 minutes. Call a physician, Poison Control Center, or the National Pesticide Information Center immediately for treatment advice. Remove person to fresh air. If inhaled If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth. Call a physician, Poison Control Center, or the National Pesticide Information Center at 1-800-858-7378 immediately for treatment advice. NOTE TO PHYSICIAN: Contains petroleum distillates -- vomiting may cause aspiration pneumonia.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-

See Inside Leaflet For Additional Precautionary Statements

Manufactured by:

LES INCORPORATED

Plant: Kaolin Road, Sandersville, GA 31082 Office: C.B. 2000, Floral Park, NY 11002-2000

PRECAUTIONARY STATEMENTS Hazards To Humans & Domestic Animals CAUTION

Harmful if swallowed or inhaled. Causes eye irritation. Avoid breathing spray mist. Avoid contact with eyes. Wear mask or rethe U.S. Bureau of Mines to give adequate protection against this material. Wear protective clothing. Wash skin thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

When using this product as a space spray in food processing plants, foods should be removed or covered during treatment. Do not apply as a space spray while food processing is underway. Food processing surfaces and equipment must be covered during treatment or cleaned with an effective detergent and rinsed with potable water before reuse. Except in Federally inspected meat and poultry plants, food processing operations may continue when this product is applied as a surface spray with care and in accordance with the directions and precautions given above.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, occans or e National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Dr. not discharge offluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. Board or Regional Office of the EPA. This product is toxic to fish, shrimp, crab and other aquatic organisms. Do not apply directly to water, to areas with a surface water is present, or to intertidal areas below the mean high watermark. Shrimp and crab may be killed at application rates recommended on this laber. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

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DIRECTIONS FOR USE

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

A highly versatile synergized pyrethrin insecticide concentrate for indoor or outdoor application as a surface, space, area or contact spray. ExciteR may be applied through mechanical, aerosol or ULV generators as well as thermal fogging equipment and conventional fogging or spraying equipment. ExciteR may be applied as a general surface, space, spot or crack and crevice treatment in both food and non-food areas of food handling establishments and is authorized for use in all areas of official establishments operating under the Meat, Poultry, Shell Egg Grading and Egg Products Inspection Programs.

ExciteR is intended for use in and around buildings and structures as well as modes of transport. INDOOR USE AREAS: Apartment buildings, bakeries, beverage plants, bottling facilities, breweries, cafeterias, candy plants, canneries, cereal processing and manufacturing plants, dairies and dairy product processing plants, flour mills, food processing plants, frozen food plants, grain elevators, grain mills, granaries, homes, hospitals, hotels, houses, industrial buildings, kennels, kitchens, laboratories, manufacturing facilities, mausoleums, meat processing and packaging plants, meat and vegetable canneries, motels, nursing homes, office buildings, restaurants, schools, spice plants, stores, supermarkets, warehouses, wineries and similar structures. OUTDOOR AREAS: Drive-in restaurants, drive-in theaters, golf courses, parks, playgrounds, recreational areas, urban areas and zoos. MODES OF TRANSPORT: Aircraft (do not use in occupied aircraft cabins), buses, trucks, trailers, rail cars and marine vessels.

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 persons. Do not enter treated areas without protective clothing until sprays have dried.

The insecticidal components of ExciteR, pyrethrins and piperonyl butoxide, are classified as food additives and established tolerances will not be exceeded when used as directed. ExciteR may be diluted with water or oil and applied with conventional application equipment including, but not limited to, compressed air sprayers. power sprayers, mechanical aerosol generators (ULV generators or cold foggers) and thermal foggers (oil dilutions only). When diluting with water, prepare only the amount needed for immediate use and agitate occasionally during use. Holding a water dilution more than 24 hours is not recommended. For oil dilutions that are applied in food handling establishments, a deodorized petroleum oil which conforms with CFR 21 (especially section 172.884) is required (such as Exxon Isopar M. Ashland Low Odor Base Solvent or the equivalents).

Tank-mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label dosages may be exceeded. This product cannot be tank-mixed with any product with label prohibitions against such mixing.

INDOOR USE AS A CONTACT AND SURFACE SPRAY

GENERAL PEST CONTROL: To control accessible, exposed stages of crawling insects including, but not limited to, Ants, Cockroaches, Cadelles, Cigarette Beetles, Dark Mealworms. Dried Fruit Beetles, Drugstore Beetles, Confused Flour Beetles, Grain Mites, Red Flour Beetles. Rice Weevils, Sawtoothed Grain Beetles, Spider Beetles. Yellow Mealworms in sites that include, but are not limited to, apartments, homes, restaurants, food processing plants, industrial installations and warehouses, dilute at the rate of up to 4.25 fluid ounces of ExciteR per gallon of water and apply at the rate of 1 gallon to 750 square feet. Thoroughly spray the surfaces where these insects are usually found including walls, baseboards, moldings, doors, cabinets, shelves, sinks and pipes with special attention to cracks and crevices, niches, dark corners, drains and other harborage sites.

Except in Federally inspected meat and poultry plants, food processing operations may continue when ExciteR is applied as a surface, spot or crack and crevice treatment in accordance with the directions and precautions given above.

DILLETION CHART

Fluid Ounces of ExciteR Per Gallon	% Pyrethrins	Approximate % Piperonyl Butoxide
0.25	0.0125	0.125
0.5	0.025	0.25
1.0	0.05	0.5
2.125	0.1	1.0
4.25	0.2	2.0

IN USDA INSPECTED FACILITIES: To control accessible, exposed stages of crawling insects including, but not limited to, Ants, Cockroaches, Cadelles, Cigarette Beetles, Confused Flour Beetles. Dark Meabworms, Dried Fruit Beetles, Drugstore Beetles, Grain Miles, Red Flour Beetles. Rice Weevils, Sawtoothed Grain Beetles, Spider Beetles, Yellow Mealworms, dilute 2.125 fluid ounces of ExciteR per gallon of water and apply at the rate of 1 gallon to 750 square feet. Thoroughly spray the surfaces where these insects are usually found including walls, baseboards, moldings, doors, cabinets, shelves, sinks and pipes with special attention to cracks and crevices, niches, dark corners, drains and other harborage sites.

IN COMBINATION WITH RESIDUAL INSECTICIDES (including, but not limited to, Baygon, Commodere, Conquer, Cynoff, Demon, Diazinon, Duroban, Empire. Ficam, Pyrid, Saga, Safrotin, and Tempo):

To provide flushing and quick knockdown of insects: ExciteR may be tank mixed with other insecticides at the rate of 1/4 to 1/2 ounce (equivalent to 1/2 to 1 tableupoon or 7.4 to 14.8 ml) per gallon of finished apray.

To provide increased control of resistant Corman cockreaches: tank mix 2.125 to 4.25 fluid ounces of ExciteR with the appropriate amount of companion insecticide per finished gallon and apply per the Directions for Use on the companion insecticide label. In USDA inspected facilities, tank mix 2.125 fluid curious of ExciteR with the appropriate amount of companion insecticide per finished gallon and apply per the Directions for Use on the companion insecticide label.

Tank Mixes in Combination With Residual Insecticides

This product can be mixed with Evercice Fi Essenvalerate EC, Cynoff^{©2} EC Insecticide, Cynoff^{©2} Power Spray Insecticide, Conquer Advanced Generation Insecticide, Predlude ESEC, Demon EC Insecticide, Perm-Up S 3.2 EC, Astro E2 Insecticide, LG⁶ Permethrin 3.2 Termiticide Insecticide, Unicorn 40% Permethrin EC. Atroban ** 11% EC Insecticide. Prentox ** Prenbay*** Prenbay** Prenbay** Prenbay*** Prenbay*** Prenbay*** Prenbay*** Prenbay** Pr 14.8 ml) per gallon of finished spray, for use as a flushing and knockdown agent to aid in control of crawling insects and flying insects as listed on the 're's each product, in accordance with the most restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. To provide increased control of resistant German Cockroaches: tank mix 2.125 to 4.25 fl. or nees of ExciteRTM with the appropriate amount of companion insecticide label. In USDA inspected facilities, tank mix 2.125 fl. ounces of ExciteRTM with the appropriate amount of companion insecticide per tinished gallon and apply in accordance with the Directions for Use on the companion insecticide label.

Prior to tank-mixing, a small jar compatibility test should be conducted using the proper proportions of chemicals and water to ensure the physical competibility test should be conducted using the proper proportions of chemicals and water to ensure the physical competibility test should be conducted using the proper proportions of chemicals and water to ensure the physical competibility test should be conducted using the proper proportions of chemicals and water to ensure the physical competibility test should be conducted using the proper pr mixture. When tank-mixing ExciteR with wettable powder formulations, first add the wettable powder to the diluent and agitate to thoroughly suspend it in solution and then add the desired amount of ExciteR to the diluted wettable powder. Tank-mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label application rates may be exceeded. This product cannot be tank-mixed with any product with lake, prohibitions against such Trademark designations: \(^1\)McLaughlin Gormley King Co., \(^2\)FMC Company, \(^3\)Terminix International, Inc., \(^4\)Syngenta Professional Products, \(^1\)United Phosphorus, \(^6\)LG Chem Investment, Inc., \(^3\)United Phosphorus, \(^5\)Chem Investment, Inc., \(^3\)United Phosphorus, \(^5\)LG Chem Investment, Inc., \(^3\)LG Chem Investment,

FLEA AND TICK CONTROL IN BUILDINGS: Dilute 2.125 to 4.25 fluid ounces of ExciteR per gallon of water and apply the spray thoroughly to infested areas such as pet beds and resting quarters, nearby cracks and crevices, rugs and floor coverings (including under their edges) between and under the cushions of upholstered furniture and other areas where these pests may be present. Entire rugs and furniture should be treated at the rate of 1 gallon of dilute spray per 750 square feet of surface. In combination with conventional residual insecticides: To provide quick knockdown of adult fleas, tank-mix 0.5 to 1.0 fluid ounce of ExciteR with the appropriate amount of companion insecticide per finished gallon and apply per the Directions for Use on the companion insecticide label.

Prior to tank-mixing, a small jar compatibility test should be conducted using the proper proportions of chemicals and water to ensure the physical compatibility of the mixture. Tank-mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label application rates may be exceeded. This product cannot be mixed with any product with label prohibitions against such mixing.

In combination with Insect Growth Regulators: To provide quick knockdown of adult fleas, tank-mix 2.125 to 4.25 fluid ounces of ExciteR with the appropriate amount of companion insecticide per finished gallon and apply per the Directions for Use on the companion insecticide label.

mixture. Tank-mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label application rates may be exceeded. This product cannot be mixed with any product with label prohibitions against such mixing.

Pet bedding should be removed and replaced with fresh bedding after treatment of pet areas. The pets should also be treated with an EPA registered product before they are allowed to enter the treated area.

PANTRY PEST CONTROL: To control exposed adult and immature stages of Stored Product Insects including, but not limited to, Almond Moths, Angoumois Grain Moths, Cadelles, Cigarette Beetles, Confused Flour Beetles, Drugstore Beetles, Flat Grain Beetles, Granary Weevils, Indianmeal Moths, Lesser Grain Borers, Maize Weevils, Mediterranean Flour Moths, Merchant Grain Beetles, Red Flour Beetles, Rice Weevils, Rusty Grain Beetles, Sawtoothed Grain Beetles and Squarenecked Grain Beetles, ditue 2.125 to 4.25 fluid ounces of ExciteR per gallon of water and apply to cupboards, shelves and storage areas. Remove all utensils, unprotected foodstuffs (or any with original packaging that has been opened), shelf paper and other objects before treatment. Allow treated surfaces to dry and then cover shelves with clean paper before replacing any utensils, foodstuffs or other items. Discard any foodstuff that was accidentally contaminated with the spray solution.

PREMISE PEST CONTROL: Termite swarmers: To control swarming termites, dilute 2.125 to 4.25 fluid ounces of ExciteR per gallon of water and apply as a surface spray at the rate of 1 gallon per 750 square feet. Apply as a crack and crevice treatment to the locations from which the termites are emerging.

Carpet Beetles: To control carpet beetles (black, furniture and varied), dilute 4.25 fluid ounces of ExciteR per gallon of water and apply to the entire carpet at the rate of 1 gallon per 750 square feet. Make localized applications under the edge of carpets, floor coverings, and furniture as well as along baseboards, in closets and to infested areas of shelving.

BED BUGS: To control *Bedbugs*, dilute 2.125 fluid ounces of ExciteR per gallon of water and apply thoroughly to the top, ends, sides and bottoms of mattresses paying special attention to tufts, seams and folds. Treat bedsprings and frames, including all cracks and joints. Apply as a crack and crevice treatment to all baseboards, moldings, flooring, closets, shelves, furniture and picture frames that may provide harborage to bedbugs.

WEBBING CLOTHES MOTHS: To control *Clothes Moths*, remove infested articles from storage, brush them thoroughly and air-dry them in sunlight for several hours. Dilute 2.125 fluid ounces of ExciteR per gallon of water and apply as a crack and crevice treatment to empty chests, bureaus and storage sites. After airing, infested articles may be lightly treated with the spray solution (keep the nozzle at least three feet from the fabric to avoid staining).

FOR INDOOR APPLICATIONS: Remove pets (including birds) from the area being treated and cover fish aquaria before spraying.

INDOOR USE

To control crawling and flying insects in sites that include, but are not limited to, food processing plants, (INCLUDING USDA INSPECTED FACILITIES), industrial installations and warehouses, ExciteR may be diluted with water and applied as a space spray. For best results, close doors and windows before spraying and keep them closed for 30 minutes after treatment. The applicator must vacate the area after treatment and ventilate before reoccupying. Where oil residues are not undesirable, ExciteR can be diluted in deodorized base oil instead of water and applied with mechanical, thermal or ULV applicators.

The use of this product, as a space spray, in food processing or food handling establishments must be confined to time periods when the plant is not in operation. Foods must be covered or removed during treatment. Food processing surfaces and equipment must be covered during treatment or cleaned with an effective detergent and rinsed with potable water before use.

CRAWLING AND FLYING INSECTS: For control of accessible, exposed stages of CRAWLING INSECTS including, but not limited to, Ants, Cockroaches, Cadelles, Cigarette Beetles, Confused Flour Beetles, Dark Mealworms, Dried Fruit Beetles, Drugstore Beetles, Grain Mites, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Spider Beetles, Yellow Mealworms and Flying Insects including, but not limited to, Angoumois Grain Moths, Cheese Skippers, Fruit Flies, Fungus Gnats, House Flies, Indianneal Moths, Mosquitoes, Mediterranean Flour Moths, Small Flying Moths, Tobacco Moths, dilute 10.67 fluid ounces of ExciteR per gallon of water or oil and apply at the rate of 1 ounce per 1000 cubic feet of space. Direct the spray towards the ceiling and upper corners of the area and behind obstructions. Vacate the treated area and keep the area closed for at least 30 minutes after treatment. Ventilate the area before reoccupying. Repeat treatment as necessary.

FLYING INSECTS: For control of accessible, exposed stages of flying insects including, but not limited to, Angoumois Grain Moths, Cheese Skippers, Fruit Flies, Fungus Gnats. Gnats, House Flies, Indianmeal Moths, Mosquitoes, Mediterranean Flour Moths, Small Flying Moths, Tobacco Moths, dilute 2.67 fluid ounces of ExciteR per gallon of water or oil and apply at the rate of 1 ounce per 1000 cubic feet of space. Direct the spray towards the ceiling and upper corners of the area and behind obstructions. Vacate the treated area and keep the area closed for at least 30 minutes after treatment. Ventilate the area before reoccupying. Repeat treatment as necessary.

VOID AREA TREATMENT: Undiluted ULV treatment: To treat inaccessible voids including, but not limited to, attics, false ceilings, wall and equipment voids, calculate the volume of the void and apply ExciteR through ULV equipment adjusted for crack and crevice application at the rate of 0.33 fluid ounces per 1000 cubic feet of space.

OUTDOOR USE

PERIMETER TREATMENTS: To control Ants, Bees, Centipedes, Cockroaches, Crickets, Firebrais, Fleas, Ground Beetles, Millipedes, Pillbugs, Silverfish, Sowbugs, Spiders, Ticks and Wasps, dilute 2.125 to 4.25 fluid ounces of ExciteR per gallon of water and apply at the rate of 1 gallon per 750 square feet to a band of soil and vegetation 6 to 10 feet wide around and adjacent to buildings. Treat the building foundation to a height of 2 to 3 feet at the rate of 1 gallon per 750 square feet

TICK CONTROL: To control Brown Dog Ticks around residential areas, rural fields, woods, lots, roadsides, pathways and coastal vegetation areas, dilute 4.25 fluid ounces of ExciteR per gallon of water and apply with a mist blower (or other similar equipment) calibrated to deliver 3 gallons per acre. Apply during the peak of infestation and repeat as necessary to maintain control. Thorough applications should be made to the vegetation upon which the ticks rest.

FLEA CONTROL: To control fleas around residential areas, dog houses, kennels, paths, patios and under plants, shrubs, trees or other shaded, moist areas where pets may rest, dilute 4.25 fluid ounces of ExciteR per gallon of water and apply at the rate of 1 gallon per 750 square feet.

In combination with other insecticides: To provide quick knockdown of insects when used with a residual insecticide, tank-mix 1.0 to 2.125 fluid ounces of ExciteR with the proper amount of companion insecticide and apply per the Directions for Use on the companion insecticide label.

Prior to tank-mixing, a small jar compatibility test should be conducted using the proper proportions of chemicals and water to ensure the physical compatibility of the mixture. Tank-mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label application rates may be exceeded. This product cannot be mixed with any product with label prohibitions against such mixing.

USE ON TURF AND GRASS: Used alone as a contact spray: To control Ants, Armyworms, Billbugs, Chinch Bugs, Chiggers, Crickets, Cutworms, Earwigs, Fleas, Grasshoppers, Hyperodes Weevils (adults), Japanese Beetles (adults), Mole Crickets, Sod Webworms And Ticks, dilute and apply per the instructions in the following table:

Treatment Area (Square Feet)	Fluid Ounces of ExciteR	Suggested Volume Of Water (Gallons)
1000	0.25 to 0.5	2.5 to 5.0
5000	1.25 to 2.5	12.5 to 25.0
20000	5.0 to 10.0	50.0 to 100.0
43560 ^b	12.0 to 24.0	110.0 to 220.0

Dilute with enough water to obtain thorough coverage.

In combination with other insecticides: To provide quick knockdown of insects when used with a residual insecticide, tank-mix ExciteR at the rate listed above with the proper amount of companion insecticide and apply per the Directions for Use on the companion insecticide label.

Prior to tank-mixing, a small jar compatibility test should be conducted using the proper proportions of chemicals and water to ensure the physical compatibility of the mixture. Tank-mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label application rates may be exceeded. This product cannot be mixed with any product with label prohibitions against such mixing.

As a turf pest diagnostic aid: To detect turf insects prior to making an insecticide application or to evaluate control from previous treatments, dilute 0.5 fluid ounces of ExciteR per gallon of water and apply evenly with a sprinkling can over one square yard of turf. Record the species and number of insects present ten minutes after application. Sample 3 to 5 sites per 5000 square feet. Note: This procedure does not bring white grubs or billbug grubs to the surface. Use other methods to sample for these pests.

PETS

PRE-TREATMENT DIRECTIONS

READ ENTIRE LABEL BEFORE EACH USE

USE ONLY ON DOGS TO KILL FLEAS AND TICKS: Do not use on dogs under 12 weeks.

SPECIAL ANIMALS

Consult a veterinarian or call the National Pesticide Information Center at 1-800-858-7378, before using this product on debilitated, aged, pregnant nursing or medicated animals

ADVERSE REACTION INFORMATION

Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately, or call the National Pesticide Information Center at 1-800-858-7378.

APPLICATION DIRECTIONS

TO CONTROL FLEAS AND TICKS ON DOGS: Dogs may be treated with ExciteR by diluting at the rate of 1.0 to 2.125 fluid ounces per gallon of water and spraying or sponging thoroughly (to penetrate the hair and contact the skin) to all parts of the animal's body except the eyes, nose, mouth and genitalia. For best results against fleas and ticks on dogs, the animal's quarters should also be treated and bedding should be removed and replaced after the pet areas are treated.

REAPPLICATION DIRECTIONS

Do not reapply product for 7 days.

STORAGE AND DISPOSAL

FOR CONTAINERS LARGER THAN ONE GALLON:

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

Pesticide Storage And Spill Procedures: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

Container Disposal: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfull, or by other approved State and local procedures.

CONTAINERS ONE GALLON AND SMALLER:

Storage: Store in original container in a cool, dry place inaccessible to children and pets.

Disposal: Do not reuse container. Wrap container in several layers of newspaper and discard in trash

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

⁴³⁵⁶⁰ square feet = 1 acre.



TM **ExciteR**

ACCEPTED with COMMENTS In EPA Letter Dated:

9 2003

NSF Category Code: F1 NSF Registration No. 072060

Under the Federal Innecticide,

*PROVIDES RAPID KNOCKDOWN AND KILL OF INSECTS

*MAY BE TANK-MIXED WITH RESIDUAL INSECTICIDES AND INSECT GROWTH REGULATERS FOR USE IN GERMAN COCKROACH RESISTANCE MANAGEMENT PROGRAMS

*FOR USE IN GERMAN COCKROACH RESISTANCE MANAGEMENT PROGRAMS

**GENERAL PROGRAMS

**G *MAY BE APPLIED AS A WET SPRAY WHILE FOOD PLANTS ARE IN OPERATION *NOT FOR USE ON TURF BEING GROWN FOR SALE OR OTHER COMMERCIAL USE AS SOD, OR FOR

COMMERCIAL SEED PRODUCTION, OR FOR RESEARCH PURPOSES.

ACTIVE INGREDIENTS:	
Pyrethrins	6.0%
*Piperonyl Butoxide, Technical	60.0%
**OTHER INGREDIENTS:	34.0%
TOTAL:	100.0%

^{*}Equivalent to min. 48.0% (butylcarbityl)(6-propylpiperonyl) ether and 12.0% related compounds.

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ExciteR - Trademark of Prentiss Incorporated

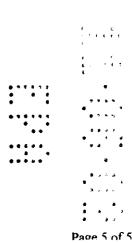
EPA REG. NO.	655-798 EPA EST. NO.
1,,,	KEEP OUT OF REACH OF CHILDREN
	CAUTION
	FIRST AID Have product container or label with you when obtaining treatment.
If swallowed	 Call a physician. Poison Control Center, or the National Pesticide Information Center at 1-800-858-7378 immediately for treatment advice. Do not induce vomiting unless told to do so by the Poison Control Center or physician. Do not give any liquid to person. Avoid alcohol. Do not give anything by mouth to an unconscious or convulsing person.
If in eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a physician, Poison Control Center, or the National Pesticide Information Center at 1-800-858-7378 immediately for treatment advice.
If on skin or clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a physician, Poison Control Center, or the National Pesticide Information Center immediately for treatment advice.
If inhaled	 Remove person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a physician, Poison Control Center, or the National Pesticide Information Center at 1-800-858-7378 immediately for treatment advice.
For information	YSICIAN: Contains petroleum distillates – vomiting may cause aspiration pneumonia. on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National nation Center at 1-800-858-7378.
	SEE INSIDE LEAFLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured by:

PRENTISS INCORPORATED

Plant: Kaolin Road, Sandersville, GA 31082 Office: C.B. 2000, Floral Park, NY 11002-2000

5/98



^{**}Contains Petroleum Distillate