

Mr. Steven Rogosheske
Regulatory Affairs Manager
Value Garden Supply
9100 W. Bloomington Freeway
Suite 113
Bloomington, MN 55431

NOV - 7 2007

Subject: Response to Label Update per PRN 2001-1 and Label Revisions
Product Name: R & M 30-3 Pyrethrin E.C.
Registration No.: 769-617
Date of Submission: 30 July 2007

Dear Mr. Rogosheske;

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. Two copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Modify the label as indicated below:
 - a. Page 2, under Precautionary Statements:
 - Revise "Concentrate causes substantial but temporary eye injury. Do not get in eyes or on clothing. When handling concentrate, wear goggles or face shield or safety. Harmful if swallowed. Remove pests, birds and cover fish aquaria before spraying. Do not breathe spray mist. Wear mask or respirator of type against this material. Wear Protective clothing. Wash exposed skin surfaces with soap and water after handling and before eating and smoking." To read "Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes or on clothing. When handling, wear goggles or face shield. Do not breathe spray mist. Wear a mask or respirator MSHA/NIOSH-approved against pesticides. Wear protective clothing. Remove contaminated clothing and wash clothing before reuse. Wash exposed skin surfaces with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet."
 - b. Throughout directions for use,
 - Modify all measures of liquids from ounces (oz.) to fluid ounces (fl. oz.).
 - Modify "X [units of volume] per X [units of area or volume]" to read "X [units of volume] dilution per X [units of area or volume]".
 - c. Page 3, under "To control bedbugs:
 - Add "Allow to dry thoroughly before making the bed."

1/2

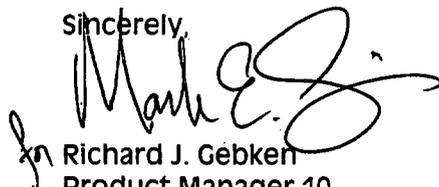
CONCURRENCES

	H7505C							
	MSUAREZ							
	Nov 8, 2007							

- d. Page 4, under "To kill mosquitoes...":
 - Revise "Dilute 1 part concentrate to 34 parts water (3.75 oz. per gallon)..." to read "Dilute 1 part concentrate to 14 parts water (8.5 fl. oz. per gallon)..." [An amendment supported by product performance data for the proposed rate may be submitted at a later date.]
 - e. Page 4, under "To kill fleas and ticks on cats and dogs":
 - 1) Add "READ ENTIRE LABEL BEFORE EACH USE."
 - 2) Add "USE ONLY ON DOGS OR CATS."
 - 3) Add "Do not reapply product for 7 days."
 - f. Page 4, under "For rapid kill of exposed...":
 - Revise "Dilute 1 part concentrate in 6 parts water (21 oz. per gallon)... Apply the above dilutions at a rate of 1 ounce per 1000 cubic feet of space." to read "Dilute 1 part concentrate in 1 to 3 parts water (13 to 64 oz. per gallon)... Apply the above dilutions at a rate of 1 to 10 fluid ounces per 1000 cubic feet of space." [An amendment supported by product performance data for the proposed rate may be submitted at a later date.]
 - g. Page 5, under "To control listed insects":
 - Revise "Combine 1.0 fluid ounce of emulsion per 1 1/2 gallon of water." to read "Combine 1.0 fluid ounce of emulsion per 1 gallon of water." [An amendment supported by product performance data for the proposed rate may be submitted at a later date.]
 - h. Page 5, under "To control listed insects":
 - Revise "For containers on gallon or less" to read "For containers one gallon or less".
2. Remove the following marketing claims:
- "leaves no harmful residues" (p.1)

Value Garden Supply should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). As a result, additional data and/or labeling changes may be required for products containing pyrethrins and piperonyl butoxide.

A stamped copy is enclosed for your records. If you have any questions, you may contact Mark E. Suarez, at (703) 305-0120.

Sincerely,

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

R & M 30-3 PYRETHRIM E.C.

AN INSECTICIDE SPRAY CONCENTRATE FOR USE IN FOOD PROCESSING AND STORAGE, MUSHROOM HOUSES, HOSPITALS, HOTELS, MOTELS, RESTURANTS, AND OTHER INSTITUTIONS.

☞ Editors Note – Text in [Brackets] are optional marketing statements, any or all of which may be used on the final printed label.

[Also for use in horse barns, dairy and hog barns, kennels and other farm structures or buildings housing animals or poultry.]

[Provides rapid kill of insects without leaving objectionable residues.]

[Kills Gypsy Moth Caterpillars and Japanese Beetles.]

[Dilute with water for use on vegetables and ornamental plants and shade trees.]

[Controls listed crawling and flying insects on porches and patios, in and around garages and around the yard.]

[Quick-Acting – leaves no harmful residues.]

[Acceptable for use to day of harvest on edible plants.]

ACTIVE INGREDIENTS:

Pyrethrins	3.0%
*Piperonyl Butoxide, Technical	30.0%

****OTHER INGREDIENTS:**..... 67.0%

TOTAL 100.0%

*Equivalent to min 24% (butylcarbityl) (6-propylpiperonyl) ether and to 6% related compounds.

**Contains petroleum distillates

**KEEP OUT OF REACH OF CHILDREN
WARNING**

See [rear panel] [inside booklet] for additional precautions

MANUFACTURED BY:
Value Garden Supply
PO Box 585
St. Joseph, MO 64502

**ACCEPTED
WITH COMMENTS
In EPA Letter Dated:
NOV - 7 2007**
*Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
769-617*

EPA Reg. No. 769-617

EPA Est. No.

NET CONTENTS _____

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • 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 eye. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor for immediate treatment advise. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a position control center or doctor. • Do not give anything to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • Remove victim 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. You may also contact the National Pesticide Information Center 1-800-858-7378.	
Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration hazard.	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

Concentrate causes substantial but temporary eye injury. Do not get in eyes or on clothing. When handling concentrate, wear goggles or face shield or safety. Harmful if swallowed. Remove pets, birds and cover fish aquaria before spraying. Do not breathe spray mist. Wear mask or respirator of type against this material. Wear protective clothing. Wash exposed skin surfaces with soap and water after handling and before eating and smoking.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Drift and run-off may be hazardous to aquatic organisms in water adjacent to treated areas. This product may contaminate water through runoff. This product has a potential for runoff for several weeks after application. Poorly draining soils and soils with shallow water tables are more prone to produce runoff that contains this product.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour or spill 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.

GENERAL PRECAUTIONS AND RESTRICTIONS

When used as a space spray or fog, do not remain in treated area. Exit area immediately and remain outside the treated area until aerosols, vapors, and/or mists have dispersed. Do not allow adults, children, or pets to enter until vapors, mists, and aerosols have dispersed, and the treated area has been thoroughly ventilated.

Remove or cover exposed food and drinking water before application.

Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

Remove pets, birds, and cover fish aquariums before spraying.

Do not use in aircraft cabins except in compliance with PR Notice 96-3.

HOW TO USE

To prepare dilutions, the concentrate should first be stirred or agitated well. Add the required amount of concentrate to water and blend thoroughly. This will produce a stable micro-emulsion.

For maximum effectiveness, a combination of localized surface application and space treatment is recommended.

AS A SURFACE SPRAY:

For initial cleanup of severe insect infestation, dilute at a rate of 1 part concentrate in 14 parts water (8.5 fluid ounces per gallon) and treat at 1 gallon per 1,000 square feet. This dilution may not be used in edible product areas of Federally inspected meat and poultry plants. In these plants and for normal infestations, dilute 1 part concentrate in 29 parts water (4.3 ounces per gallon).

Except when treating pets, do not allow adults, children, or pets to enter the treated area until sprays have dried.

To control cockroaches, ants, silverfish, spiders, crickets, clover mites, cheese mites, granary weevils, rice weevils, confused flour beetles, rust red flour beetles, sawtoothed grain beetles, spider beetles, cigarette beetles, drugstore beetles, meal worms, grain mites and cadelles: Use a good sprayer adjusted to deliver a coarse wet spray. Direct the spray into hiding places, cracks and crevices, under pallets, around containers or stored foods, around the base of machinery, behind shelves and drawers. Spray bookcases for silverfish. Spray ant trails, nests and points of entry. If surface application only is to be used, spray floors, wall and other surfaces applying at a rate of 1 gallon to 750 sq. ft. of surface.

To control carpet beetles: Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, closets and infested areas of shelving. Repeat treatment as needed.

To control bedbugs: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as needed.

Wasps & Hornets: Apply at dusk when insects are at rest. Spray liberally into hiding and breeding places contacting as many insects as possible. Repeat if necessary.

Spiders: Spray directly on spiders and web. Repeat if necessary.

To kill cockroaches, palmetto bugs, earwigs, sowbugs, centipedes, millipedes, crickets, silverfish and clovermites: Spray thoroughly into hiding places such as cracks, crevices, moist

areas, openings around pipes, spigots, storage areas and sheds. Spray directly on insects where possible. Repeat treatment if necessary.

To kill mosquitoes, gnats (midges), house flies, biting flies and small flying moths (millers): Dilute 1 part concentrate to 34 parts water (3.75 oz. per gallon) and apply spray to shrubs, bushes, and grassy areas at 1 gallon per 1000 square feet. Spray these areas with slow sweeping motion while moving away from the treated area. To reduce annoyance from these flying insects, treat open porches and patios in a similar manner. For best results spray when air is still. Allow spray to dissipate before occupying the treated area. Repeat if necessary.

To control fleas, and brown dog ticks: Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames and localized areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment.

To kill fleas and ticks on cats and dogs: Dilute at 1 part concentrate to 19 parts water (6.4 fluid ounces per 1 gallon) and wet animal by dripping or spraying.

Do not apply to pets less than 12 weeks old. Consult a veterinarian before applying this product on medicated, debilitated, aged, pregnant, or nursing animals. Sensitivities may occur after using any pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

AS A SPACE SPRAY:

Dilute at a rate of 1 part concentrate to 19 parts water (6.4 fluid oz. per gallon). Apply with mechanical or compressed air equipment (non-thermal) adjusted to deliver an aerosol spray (no droplets over 50 microns in diameter and 80% less than 30 microns). Close doors and windows and shut off ventilating systems.

For rapid control of adult house flies, fruit flies, gnats, mosquitoes, skipper flies, wasps, hornets, Angoumois grain moths, Mediterranean flour moths, Indian meal moths, and tobacco moths: Direct spray at an upward angle distributing it uniformly through the entire area at a rate of 1 ounce (diluted spray) per 1000 cubic feet of space. Keep area closed for at least 10 minutes. Ventilate and sweep dead insects before reoccupying.

For rapid kill of exposed or accessible stages of other insects named on this label: Dilute 1 part concentrate in 6 parts water (21 ounces per gallon). Apply using conventional, mechanical or compressed air equipment (non-thermal), following directions for space spraying. Apply the above dilutions at a rate of 1 ounce per 1000 cubic feet of space.

IN MUSHROOM PRODUCTION AND PROCESSING: To control adult Mushroom flies, or fungus gnats, phorids, sclerids, and cecidomyiids in growing houses. Dilute 1 part concentrate in 1 part water (64 fluid ounces per gallon). Using mechanical or compressed air equipment (non-thermal) adjusted to deliver a fine mist, apply at a rate of 1 ounce per 1000 cubic feet of space. Fogger should be operated 8 to 10 feet away from beds and directed slightly upward over them. Circulating fans should be left in operation, but for best results refrigeration should be turned off. In packing and canning plants, use at a rate of 1 ounce to 1000 cu. ft. of space.

FOR USE IN FOOD PROCESSING PLANTS:

Dilute and spray as directed under **Surface Spray** and **Space Spray** directions.

Do not make space spray applications when facility is in operation. Do not apply at any time as an undiluted space spray in edible product areas of federally inspected meat and poultry plants. During space spray applications, cover or remove food. During space spray applications, cover food processing surfaces or clean after treatment with a suitable detergent and rinse with potable water before use. Do not apply more than 1 time per day.

OUTDOORS

Use outdoors and in greenhouses throughout the growing season or as a preharvest treatment when other insecticides are prohibited due to residue restrictions and use limitations.

Do not wet plants to point of runoff or drip.

Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.

Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) or apply prior to heavy rainfall.

To kill gypsy moth caterpillars and adults, adult Japanese beetles and Eastern and forest tent caterpillars on contact: Combine 3.0 fluid ounces of concentrate per 1 gallon of water. Apply to insure through coverage of upper and lower leaf surfaces.

On trees and shrubs: Treat trees and shrubs as soon as insects emerge (usually late spring). Treat leaves, branches and tree trunks evenly, making sure to penetrate dense foliage. Repeat application every 7 days as necessary for control.

On roses and in flower gardens: treat plants and flowers as soon as insects appear. Spray plants and flowers making sure to penetrate dense foliage. Repeat application every 7 days or as necessary for control.

To control listed insects: Combine 1.0 fluid ounce of emulsion per 1 ½ gallon of water. Apply to insure through coverage of upper and lower surfaces.

VEGETABLES – Home Garden or Home Greenhouse

Do not apply more than 10 times per season. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours. Do not harvest until spray has dried.

CROPS: Asparagus, beans, broccoli, brussel sprouts, cabbage, cauliflower, celery, collards, cranberries, cucumbers, eggplant, kale, lettuce, melons, mustard greens, peppers, potatoes, radishes, spinach, squash, sweet corn, tomatoes and turnips.

INSECTS CONTROLLED: Aphids, asparagus beetles, blister beetles, cabbage loopers, Colorado potato beetles, cross-striped cabbage worms, diamondback caterpillars, flea beetles, green peach aphids, harlequin bugs, imported cabbage worms, Japanese beetles, leafhoppers, leaf tiers, Mexican bean beetles, stink bugs, 12-spotted cucumber beetles, webworms, and whiteflies.

ORNAMENTALS, TREES, SHRUBS AND ROSES

Apply as a fine mist, spraying plants on the upper and lower leaf surfaces. Do not apply more than 1 time per day.

INSECTS CONTROLLED: Aphids (red, black and green peach), bagworms, thrips, flea beetles, Japanese beetles, lace bugs, leaf hoppers, leaf rollers, leaf tiers, mimosa webworm larvae, plant bugs and whiteflies. Repeat treatment weekly, or as needed to control infestations.