



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Steven E. Rogosheske  
Regulatory Affairs Manager  
Value Garden Supply, LLC  
D/B/A Value Garden Supply  
P.O. Box 585  
Saint Joseph, MO 64502

NOV 16 2007

Subject: Fast Track Label Amendment  
SMCP Pyrethrins ULV Fogging Concentrate  
EPA Reg. No. 769-719  
Application dated: August 6, 2007

Dear Mr. Rogosheske,

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you:

1. Revise the optional marketing claims. Data were not submitted or cited to support these claims.
  - a. Change "Provides rapid kill of listed insects" to "Kills listed insects." or remove the claim.
  - b. Change "Controls listed crawling and flying insects." to "Kills listed crawling insects." or remove the claim.
  - c. Remove "Quick acting-leaves no harmful residues."
  - d. Change "Dilutable in oil only." to "Dilute only with oil-based solvents as directed by this label." or remove the claim.
2. Place an asterisk after "pyrethrins" in the ingredient statement. This footnote should read as "\*1 gallon contains 0.21 lbs pyrethrins."
3. Change the "\* piperonyl butoxide" in the ingredient statement to \*\* and place it after this ingredient. Change the corresponding footnote.
4. Add a triple asterisk \*\*\* after n-octyl bicycloheptene dicarboximide. The footnote should read "\*\*\* MGK-264 insecticide synergist"

- 5. Change “\*\* Contains petroleum distillates” to read “\*\*\*\* Contains petroleum distillates.”
- 6. Revise the precautionary statement “Hazards to Humans and Domestic Animals” to read:

“Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing with soap and hot water before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid breathing spray mist. When space spraying wear a mask or respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

- 7. Revise the “Physical Chemical Hazard Statement” to read: “Combustible. Do not use or store near heat or open flame.”

- 8. Revise the “Environmental Hazard Statement” to read: “This product is toxic to aquatic organism, including fish and invertebrates. Do not contaminate bodies of water when disposing of equipment rinsate or wash waters.” Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Drift from treated areas may be hazardous to organisms in adjacent aquatic sites.”

- 9. Revise the “Directions for Use” as follows:

- a. General Precautions and Restrictions

- i. Revise: “Remove pets, birds, and cover fish aquariums before spraying.” to read: “Remove pets, birds, and cover fish aquariums and turn off pump motor before application.”
- ii. Add the statement:” In health care facilities, remove patients prior to treatment and thoroughly ventilate treated area for 2 hours before returning patients.”
- iii. Add the statement: “Do not apply directly to food.”
- iv. Revise “Do not use in aircraft cabins except in compliance with PR Notice 96-3.” to read: “Do not use in aircraft cabins.”

- b. How to Use: Revise to read

- i. How To Use: This concentrate is designed for use undiluted in mechanical sprayers that deliver aerosol size droplets (30 microns or less). It can be diluted with refined kerosene that conforms to Food Additive regulations as described in 40CFR 180.930 (Inert ingredients applied to animals, exemptions from the requirement for a tolerance) or an odorless light petroleum oil

conforming to 21CFR 172.882 or 40 CFR 180.910 (Inert ingredients used pre- and post-harvest, exemptions from a tolerance).

*Note to the registrant: kerosene cannot be used in all food facilities! Please see [http://www.epa.gov/opprd001/inerts/decisiondoc\\_a2k.html#K](http://www.epa.gov/opprd001/inerts/decisiondoc_a2k.html#K) for information regarding the tolerance reassessment for kerosene.*

- c. Space Spray: Undiluted in Aerosol Generator
  - i. Change "Apply at the rate of 1.0 ounce of undiluted concentrate per 5,000 cubic feet of space." to read as previously approved language: "Apply at the rate of 1.0 ounce of undiluted concentrate per 1,000 cubic feet of space."
- d. Contact Spray:
  - i. Change "1,000 square feet of space" to read "1,000 cubic feet of space".
- e. "NOTE:" at the bottom of Page 3.
  - i. Revise the note because the current text does not make sense.
- f. Add "Do not use on dogs or cats." to the label.

10. Storage and Disposal Instructions.

- a. Review PR Notices 2007-1 and 2007-4 for new regulations and statements related to pesticide containers and disposal.
- b. Combine the Storage and Disposal instructions as follows:

**STORAGE and DISPOSAL**

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

**Pesticide Storage:** Store in original container upright at room temperature. Avoid exposure to temperatures more than (insert temperature) degrees or less than (insert temperature) degrees. In case of spill or leakage, soak up with absorbent material such as sand earth, fuller's earth, or other appropriate material. Dispose of product and damaged container as described below.

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

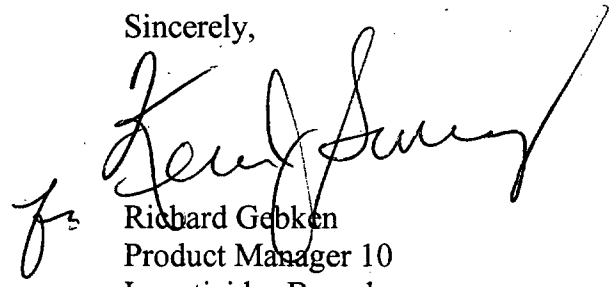
**Container Disposal < 5 gallons:** Nonrefillable. Do not reuse or refill this container. Empty container by using the product in accordance with label directions. Place empty container in trash or offer for recycling if available. **If partly filled** call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**Container Disposal  $\geq$  5 gallons:** Empty container by using the product in accordance with label directions. Triple rinse (or equivalent) promptly after emptying then off for recycling or reconditioning, if available. Otherwise, puncture and dispose of in a sanitary landfill.

11. **Name and Address:** You must add a street address to the label. A post office box is not sufficient.

A stamped copy of the label is enclosed for your records. If you have any questions, please contact Kevin Sweeney at (703) 305-5063. Thank you for your cooperation in this matter.

Sincerely,



Richard Gebken  
Product Manager 10  
Insecticides Branch  
Registration Division (7505P)

Enclosure

# SMCP PYRETHRINS ULV FOGGING CONCENTRATE

FOR USE IN HOMES, RESTURANTS, FOOD PROCESSING PLANTS, WAREHOUSES AND  
OTHER INDUSTRIAL INSTALLATIONS

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

- [Provides rapid kill of listed insects]
- [Controls listed crawling and flying insects]
- [Quick-Acting – leaves no harmful residues]
- [Dilutable in oil only]
- [Dual Synergists]

**ACTIVE INGREDIENTS:**

Pyrethrins .....	3.0%
*Piperonyl Butoxide, Technical .....	6.0%
N-octyl bicycloheptene dicarboximide .....	10.0%
<b>**OTHER INGREDIENTS:</b> .....	<b>81.0%</b>
<b>TOTAL</b>	<b>100.0%</b>

\*Equivalent to min 4.8% (butylcarbityl) (6-propylpiperonyl) ether and to 1.2% related compounds.

\*\*Contains petroleum distillates

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**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
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See [back panel] [inside booklet] for additional precautions

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

EPA Reg. No. 769-719

EPA Est. No.

NET CONTENTS \_\_\_\_\_

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**  
**NOV 16 2007**  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act,  
 as amended, for the pesticide  
 registered under EPA Reg No.  
769-719

<b>FIRST AID</b>	
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>•</li> <li>• Call a poison control center or doctor for immediate treatment advise.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to by a position control center or doctor.</li> <li>• Do not give anything to an unconscious person.</li> </ul>
<b>IF INHALED</b>	<ul style="list-style-type: none"> <li>• Remove victim to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>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.</p>	
<p>Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration hazard.</p>	

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

Harmful if swallowed or absorbed through the skin. Avoid breathing vapors. When space spraying wear mask or respirator of type against this material. Wear protective clothing. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Wash all contaminated clothing with soap and hot water before reuse.

**ENVIRONMENTAL HAZARDS**

This product is toxic to aquatic organisms, including fish and invertebrates. 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:** This concentrate is designed for use undiluted in mechanical sprayers which give particle sizes of aerosol size. It can be diluted with refined kerosene's which meet Food Additive Regulations and can be applied in fogging equipment that gives larger than aerosol particle size. It can also be diluted with oil specified above and applied as a contact spray to kill crawling insects shown on this label.

**SPACE SPRAY**

Undiluted in Aerosol Generator - To kill Flies, Mosquitoes, Small Flying Moths and Gnats. Close room and shut off all air-conditioning or ventilating equipment. Apply at the rate of 1.0 ounce of undiluted concentrate per 5,000 cubic feet of space. Direct output from aerosol generator upward towards upper corners of room and ceiling. Leave room closed for one half hour. Do not remain in treated areas. Ventilate the area after treatment is completed.

Diluted for Ordinary Mechanical Fogging Equipment - Close room and shut off all air-conditioning or ventilating equipment. Dilute concentrate with oil at the rate of 1 part concentrate plus 29 parts of oil and mix well. Apply at the rate of 50 fluid ounces diluted spray (0.4 gallons) per 25,000 cubic feet of space. Direct fog upward towards corners of room and ceiling area. Leave room closed for one half hour. Do not remain in treated areas. Ventilate the area after treatment is completed.

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.

**CONTACT SPRAY**

Diluted for use with sprayers that give large, wetting spray particles - to kill Cockroaches and accessible stages of Granary Insects: Granary Weevils, Rice Weevils, Confused Flour Beetles, Red Flour Beetles, Meal Moth larvae and adults, Cadelles, Grain Mites and Saw-toothed Grain Beetles. Dilute concentrate with oil at the rate of 1 part concentrate plus 29 parts of oil and mix well. Spray outside walls of grain bins, flooring, around base of milling machinery, wall and baseboards, areas behind cabinets, around pipes and other insect harborages using one gallon spray per 1,000 square feet of space. Force spray into all cracks and crevices. Repeat application as necessary. Do not apply more than 1 time per day.

Note: Infested stored food products should be fumigated or treated by either effective methods using an approved product intended for this purpose.

**STORAGE AND DISPOSAL**

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 absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical wastes.

**PESTICIDE DISPOSAL:** Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

For containers on gallon or less:

**STORAGE AND DISPOSAL**

**STORAGE:** Store product in its original container in a cool dry area out of reach of children and pets.

**Container Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste authority for disposal instructions. Never place unused product down any indoor or outdoor drain.

**DISCLAIMER:** Value Garden Supply warrants that this product conforms to the chemical description on the label and is reasonably fit for the specific purposes referred to in the Directions For Use, subject to the inherent risks referred to above. To the extent consistent with applicable law, Value Garden Supply makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty. To the extent consistent with applicable law, Value Garden Supply shall not be liable for any consequential, special, or indirect damages resulting from the use, handling or application of this product.

Revised 7/10/2007