

769-881

7/30/2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Diana Williams, Regulatory Affairs Manager  
Value Garden Supply, LLC  
D/B/A Value Garden Supply  
P.O. Box 585  
Saint Joseph, MO 64502

JUL 30 2009

Dear Ms. Williams,

Subject: Agency Initiated Action – PR 2005-1 Product Labeling Changes  
Pratt 25-5 ULV Mosquito Adulticide Concentrate  
EPA Registration No. 769-881  
Submission dated February 15, 2007

The label amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, is acceptable provided that you make the following label changes listed below before you release the product for shipment bearing the amended labeling:

1. Change: "Pesticide Storage and Spill Procedures" to "Pesticide Storage"
2. Change the Pesticide Container Disposal statements as follows"

**"Non-refillable containers less than 5 gallons in size:**

**Container Disposal: Nonrefillable container. Do not reuse or refill this container.** Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows. Empty the remaining contents into application equipment or mix tank and drain container for 10 seconds after the flow begins to drip. Fill the container  $\frac{1}{4}$  full of water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank. Drain container for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Once triple rinsed, recycle if available. Some agricultural pesticide containers can be taken to a container collection site or picked up for recycling. To find the nearest site, contact your chemical dealer or manufacturer, or contact [a pesticide container recycling organization] at [phone number] or [website]. If recycling is not available, dispose of in a sanitary landfill or by incineration if allowed by state and local ordinances."

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**For non-refillable containers greater than 5 gallons**

**“Container Disposal: Non-refillable container. Do not reuse or refill this container** Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse as follows:** Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. To find the nearest site, contact your chemical dealer or manufacturer, or contact [a pesticide container recycling organization] at [phone number] or [website]. If recycling is not available, dispose of in a sanitary landfill or by incineration if allowed by state and local ordinances.”

**Refillable Bulk Containers**

**“Container Disposal: Refillable container. Refill this container with pesticide only.** Do not reuse this container for any other purpose. Cleaning the container before disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full of water. Agitate vigorously or recirculate water with pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Once triple rinsed, recycle if available. Some agricultural pesticide containers can be taken to a container collection site or picked up for recycling. To find the nearest site, contact your chemical dealer or manufacturer, or contact [a pesticide container recycling organization] at [phone number] or [website]. If recycling is not available, dispose of in a sanitary landfill or by incineration if allowed by state and local ordinances.”

A stamped copy of the label is enclosed for your records. Please submit the final printed label as soon as possible but no later than 30 days from the date of this letter. If you any questions, please contact Kevin Sweeney at (703) 305-5063. Thank you for your patience and cooperation in this matter.

Sincerely,

*Richard Gebken*

Richard Gebken  
PM 13  
Registration Division 7505P  
Insecticides Branch

Enclosure

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# Pratt 25-5 ULV Mosquito Adulticide Concentrate

For use only by federal, state, tribal, or local government officials responsible for public health or vector control, or by persons certified in the appropriate category or otherwise authorized by the state or tribal lead pesticide regulatory agency to perform adult mosquito control applications, or by persons under their direct supervision.

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**  
**JUL 30 2009**  
**Under the Federal Insecticide,**  
**Fungicide, and Rodenticide Act,**  
**as amended, for the pesticide**  
**registered under EPA Reg. No.**  
**769-881**

<b>ACTIVE INGREDIENTS:</b>	
Pyrethrin.....	5.00%
Piperonyl butoxide, Technical*.....	25.00%
<b>OTHER INGREDIENTS**</b> .....	<b>70.00%</b>
<b>TOTAL</b>	<b>100.00%</b>

\*Equivalent to 20.0% (butycarbityl) (6-propylpiperonyl) ether and 5.0% related compounds.

\*\*Contains petroleum distillate

Contains 0.367 lbs. of Pyrethrins per gallon and 1.83 lbs. of Piperonyl butoxide technical per gallon.

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor.</li> <li>• Do not give any liquid to the person.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or a doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
IF IN EYES:	<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 eyes.</li> <li>• Call a poison control center for treatment advice.</li> </ul>
IF ON SKIN OR CLOTHING:	<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 advise.</li> </ul>
IF INHALED:	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For medical Emergencies call: 1-800 858-7378	
NOTE TO PHYSICIAN: This product contains petroleum distillate and may pose an aspiration pneumonia hazard.	

See [Back Panel] [Inside Booklet] for Additional Precautionary Statements

Manufactured By:  
Value Garden Supply  
P.O. Box 585  
St. Joseph, MO 64502  
[phone: 952-884-6477]

EPA Registration No. 769-881  
EPA Establishment No. 44316-MO-1

Net Contents:

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMAN AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic organisms, including fish and aquatic invertebrates. Runoff from treated areas or deposition of spray droplets into a body of water may be hazardous to fish and aquatic invertebrates. Do not apply over bodies of water (lakes, rivers, permanent streams, natural ponds, commercial fish ponds, swamps, marshes or estuaries), except when necessary to target areas where adult mosquitoes are present, and weather conditions will facilitate movement of applied material away from the water in order to minimize incidental deposition into the water body. Do not contaminate bodies of water when disposing of equipment rinsate or washwaters.

**Bee Warning:** This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply to blooming crops or weeds while bees are visiting the treatment areas, except when applications are made to prevent or control a threat to public and/or animal health determined by a state, tribal or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved by the state or tribe during a natural disaster recovery effort.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use or store near heat or open flame.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

**Mixers, loaders, applicators and other handlers must wear the following:**

- Long-sleeved shirt,
- long pants,
- Shoes and socks,

See engineering controls for additional requirements

**User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

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### ENGINEERING CONTROLS

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)]. Human flagging is prohibited. Flagging to support aerial application is limited to use of the Global Positioning System (GPS) or mechanical flaggers.

### USER SAFETY RECOMMENDATIONS

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

### 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

**Note:** Before making the first application in a season, it is advisable to consult with the state or tribal agency with primary responsibility for pesticide regulation to determine if other regulatory requirements exist.

Do not allow spray treatment to drift on to water supplies.

In treatment of corrals, feedlots, animal confinements/houses, swine lots and zoos, cover any exposed drinking water, drinking fountains and animal feed before application.

### Spray Drift Management For Wide Area Mosquito Abatement

A variety of factors including weather conditions (e.g., wind direction, speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

**WIND SPEED:** Apply only when wind speed is greater than or equal to 1 mph.

### HOW TO APPLY AND WHERE TO USE

This product [product name] is designed for application as an Ultra-Low Volume (ULV) or thermal aerosol to control adult mosquitoes and flies of nuisance, public health or disease vector importance in areas such as but not limited to: residential areas, industrial areas, commercial areas, urban areas, parks, campgrounds, woodlands, athletic fields, golf courses, playgrounds, recreational areas, overgrown waste areas, roadsides, and other areas where adult mosquitoes and flies may be found.

This product is recommended for application with ULV cold aerosol generators, thermal aerosol generators, mist-blowers, backpack sprayers, or handheld sprayers.

**FOR BEST RESULTS** treat when mosquitoes or insects are most active and weather conditions are conducive to keeping the fog near the ground e.g. cool temperatures, and consistent wind speeds are not greater than 10 m.p.h. Applications during the cool hours of night or early morning are usually preferable.

Air temperatures should be greater than 50° F when conducting all types of applications.

**DO NOT** apply more than 70 oz. of this product [Product Name] (0.2 lb. a.i. of pyrethrins and 1 lb. a.i. of piperonyl butoxide) per acre per year to any site. Do not apply more often than once per day (24

hours). More frequent treatments may be made to prevent or control a threat to public and/or animal health determined by a state, tribal or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved by the state or tribe during a natural disaster recovery effort.

This product [product name] may be used over agricultural crops because the ingredients are exempt from tolerance when applied to growing crops.

**GROUND APPLICATION**

**Vehicle-Mounted ULV Cold Aerosol Generators (Cold Fog):**

Apply through non-thermal ULV application equipment and base all acreage calculations on the equipment manufacturer's recommended swath width.

Spray equipment must be adjusted so the volume median diameter or mass median diameter is less than 30 microns ( $Dv\ 0.5 < 30\ \mu m$ ) and that 90% of the spray is contained in droplets smaller than 50 microns ( $Dv\ 0.9 < 50\ \mu m$ ). Directions from the equipment manufacturer or vendor, pesticide registrant or a test facility using a laser-based measurement instrument must be used to adjust equipment to produce acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rates(s) are properly calibrated. Apply at a rate not to exceed 0.0025 pounds of pyrethrin per acre. An optimum swath is created when this product [product name] is applied from a truck being driven perpendicular to the wind direction. Direct the spray head of the equipment to ensure an optimum distribution of the spray cloud throughout the area. For best results, apply when insects are most active and meteorological conditions are conducive to keeping the spray cloud near the ground. An inversion of air temperatures and a light breeze of approximately 1 to 3 mph is preferable. During applications consistent ground wind speeds should not exceed 10 MPH. Application of this product during cooler hours of the night or early morning is recommended.

This product [product name] may be applied through all ULV Cold Aerosol Generators, or other similar equipment designed for non-thermal ULV aerosol applications. The desired application rate may be obtained from the chart below or by altering the dilution rate of this product [product name], the flow rate of the insecticide from the application equipment and the vehicle speed. Some examples are provided in the following charts. When an alternate rate is required, adjust the flow rate accordingly, provided the droplet size and spectrum remain within the label specifications.

FLOW RATE (Fluid Ounces Per Minute)					
Dilutions Base on a 15 Gallon Tank					
Application Rate (Pounds of Pyrethrin a.i./Acre)	Vehicle Speed (MPH)	Undiluted	Diluted 1: 1	Diluted 1: 2	Diluted 1: 3
0.0025	10	5.28	10.55	15.83	21.10
	15	7.92	15.83	23.74	--
	20	10.55	21.10	--	--

FLOW RATE (Fluid Ounces Per Minute)						
Dilutions based on a 15 Gallon Tank						
Application Rate (Pounds of Pyrethrin a.i./Acre)	Vehicle Speed (MPH)	Undiluted	Diluted 1: 3	Diluted 1: 4	Diluted 1: 5	Diluted 1:6
0.001	10	2.11	8.42	10.52	12.62	14.73
	15	3.16	12.62	15.78	18.93	22.09
	20	4.21	16.83	21.04	25.24	--

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**BACKPACK OR HANDHELD SPRAYER APPLICATION:** Apply through non-thermal ULV application equipment and base acreage calculations on a 300-foot swath. To apply undiluted at 0.0025 pounds of pyrethrin per acre adjust equipment to an output rate of 2.42 ounces per minute and walk at 4 mph.

**THERMAL AEROSOL APPLICATION:** For use in truck-mounted, handheld or other thermal fogging equipment. Spray equipment must be adjusted so the volume median diameter or mass median diameter is less than 30 microns ( $D_v 0.5 < 30 \mu m$ ) and that 90% of the spray is contained in droplets smaller than 48 microns ( $D_v 0.9 < 48 \mu m$ ). Directions from the equipment manufacturer or vendor, pesticide registrant or a test facility using a laser-based measurement instrument must be used to adjust equipment to product acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rates(s) are properly calibrated. Apply this product mixed with oil at a rate not to exceed 0.0025 lbs. Pyrethrins per acre. Base acreage calculations on a 300 feet swath. For best results, direct the thermal fog into and allow to drift through areas where adult mosquitoes are found.

**URBAN ULV MOSQUITO CONTROL APPLICATIONS:** For control of resting or flying adult mosquitoes, biting flies and biting midges in harborage areas such as but not limited to utility tunnels, sewers, storm drains and catch basins, pipe tunnels, basements, underground passages, parking decks, crawl spaces under buildings, abandoned buildings or uninhabited buildings. Apply this product [product name] diluted or undiluted using mechanical foggers, hand-held or truck-mounted ULV equipment, thermal foggers or other spray equipment suitable for this type of application. This product [product name] maybe applied at rates up to but not exceeding 0.0025 lb. pyrethrin per acre.

#### **AERIAL APPLICATION**

Apply this product [product name] either diluted or undiluted at rates up to 0.0025 lb. Pyrethrin/0.0125 lb. PBO per acre by fixed wing or rotary aircraft equipped with a spraying system capable of making a ULV application. For aerial applications of this product [product name], use ULV equipment and nozzles such as rotary atomizers or similar spray equipment. Spray equipment must be adjusted so the volume median diameter produced is less than 60 microns ( $D_v 0.5 < 60 \mu m$ ) and that 90% of the spray is contained in droplets smaller than 115 microns ( $D_v 0.9 < 115 \mu m$ ). Directions from the equipment manufacturer or vendor, pesticide registrant or a test facility using a laser-based measurement instrument must be used to adjust equipment to product acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rates(s) are properly calibrated.

#### **Release Height:**

For Fixed Wing Aircraft: Apply using a nozzle height of no less than 100 feet above the ground or canopy.

For Rotary Wing Aircraft: Apply using a nozzle height of no less than 75 feet above the ground or canopy.

For best results, apply when insects are most active and meteorological conditions are conducive to keeping the spray cloud near the ground. Aerial applications using aircraft equipped with global positioning systems (GPS) may be needed to compensate for windy conditions and to ensure drift into target areas.



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**STORAGE AND DISPOSAL**

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

**Pesticide Storage and Spill Procedures:** Store upright at room temperature. Keep container tightly closed when not in use.

**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 incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NOTICE: To the extent allowed by law, buyer and user assume all risk and liability of use, storage and/or handling of this product not in accordance with the terms of this label.

02/15/07