



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

OCT 28 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms Anne Marie Zielinski
MGK Company
8810 Tenth Avenue North
Minneapolis, MN 55427-4372

Subject: Label Amendment

EPA Registration No. 1021-1674
Evercide® Nylar® Total Release Aerosol 2614
Your submission dated June 15, 2004

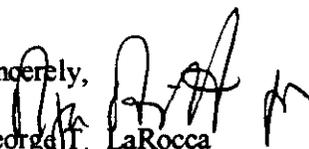
Dear Ms. Zielinski:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1) Under Hazards to Humans and Domestic Animals replace "Avoid contact with eyes" with "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."
- 2) Immediately below the First Aid statement and clearly distinguished from it, add: "Note to Physician: Contains petroleum distillate-vomiting may cause aspiration pneumonia".
- 3) Move "Avoid contamination of food and feedstuffs" from the Precautionary Statements to the Directions for Use section of the label.
- 4) Based on the use pattern of this product the Environmental Hazards statement is not required.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,


George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure



EVERCIDE® Total Release Aerosol 2614

Contains NYLAR® Insect Growth Regulator

8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4319 U.S.A.

TELEPHONE (763) 544-0341

ONE UNIT TREATS A ROOM OF UP TO 6,000 CUBIC FEET OF UNOBSTRUCTED SPACE [27 x 27 x 8]

[] OR () indicates alternate or optional wording

[Nylar®] [brand name] is an insect growth regulator similar to the naturally occurring insect growth hormones which interferes [stops] their growth and development

- [Nylar®] [brand name] stops [prevents] the flea from developing into egg laying adults
- [Nylar®] [brand name] can be used as part of an integrated pest management [IPM] program
- [Nylar®] [brand name] can be a biorational approach to insect control
- [Nylar®] [brand name] keeps working in areas exposed to the sun

- Inhibits reinfestation for up to [210 days] [30 weeks] [7 months]
- Kills adult and preadult fleas, including flea eggs for [210 days] [30 weeks] [7 months]
- Prevents fleas from developing into the biting adult stage
- Stops [prevents] hatching fleas [preadult (larval) fleas] [hatching eggs (larvae)] from becoming full-grown [developing into] biting adults
- One treatment works for [210 days] [30 weeks] [7 months] against hatching fleas [preadult (larval) fleas] [hatching eggs (larvae)]
- Kills present (today's) fleas and prevents new (tomorrow's) fleas from growing up to bite
- [Nylar®] [brand name] activity keeps working for [210 days] [30 weeks] [7 months]
- Controls [stops (kills) (prevents)] stages of fleas that don't look like fleas
- Prevents [stops] the emergence of adult fleas
- Flea eggs deposited on treated areas will not develop into adult fleas
- Larvae crawling onto treated areas will not develop into adult fleas
- [Nylar®] [brand name] acts on the immature life stage of the flea, preventing it from developing into biting adults

- Kills [inhibits] Cockroaches, Ticks, Ants, and other listed insects
- Also kills Deer Ticks and other Ixodid species that may carry and transmit Lyme Disease
- Effective long-term control

**ACCEPTED
with COMMENTS
In EPA Letter Dated
OCT 28 2004**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
1021-1674

ACTIVE INGREDIENTS:

Pyrethrins	0.050%
(S)-cyano(3-phenoxyphenyl)methyl-(S)-4-chloro-alpha-(1-methylethyl)benzeneacetate.....	0.100%
* Piperonyl butoxide, Technical	0.100%
** N-Octyl bicycloheptene dicarboximide	0.167%
2-[1-Methyl-2-(4-phenoxyphenoxy) ethoxy] pyridine	0.100%

OTHER INGREDIENTS

**99.483%
100.000%**

- * Equivalent to 0.080% (butylcarbityl) (6-propylpiperonyl) ether and 0.020% related compounds
- ** MGK® 264, Insecticide Synergist

EVERCIDE, NYLAR, MGK® - Registered trademarks of McLaughlin Gormley King Company

KEEP OUT OF REACH OF CHILDREN

WARNING

STORE THIS PRODUCT IN AN AREA INACCESSIBLE TO CHILDREN

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none"> ▪ Immediately call a poison control center or doctor. ▪ Do not induce vomiting unless told to do so by a poison control center or a doctor. ▪ Do not give any liquid to the person. ▪ Do not give anything by mouth 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.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information regarding medical emergencies or pesticide incidents, call the International Poison Center at 1-888-740-8712.</p>	

PRECAUTIONARY STATEMENTS

WARNING

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Causes skin irritation. Harmful if absorbed through skin. Do not get on skin or clothing. Avoid contact with eyes. Wash thoroughly with

soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Avoid contamination of food or feedstuffs.

ENVIRONMENTAL HAZARDS

Do not contaminate water when disposing of equipment wash waters.

PHYSICAL OR CHEMICAL HAZARDS



Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the Directions for Use on this label very carefully.

[NYLAR®] [brand name], an insect growth regulator, is similar to growth hormones that occur naturally in insects. [NYLAR®] [brand name] inhibits development of the immature stages of the flea for [210 days] [30 weeks] [7 months] preventing them from reaching the biting adult stage.

[EVERCIDE® Total Release Aerosol 2614] [brand name] contains a combination of three insecticides that stops [blocks (interrupts) (terminates)] the flea life cycle in three ways and controls other listed insects. The first insecticide is [NYLAR®] [brand name], an insect growth regulator that will not allow the flea to reproduce thereby providing long-term [residual] control. The second insecticide is the botanical Pyrethrum, [an extract of a Chrysanthemum flower,] which provides effective, quick-kill of insects upon direct contact and an added benefit of flushing the insects from their hiding place to aid in a more complete control [kill]. Esfenvalerate, the third active insecticide, provides activity until [NYLAR®] [brand name] takes effect.

[EVERCIDE® Total Release Aerosol 2614] [brand name] contains a combination of ingredients that kills both adult and hatching fleas [preadult (larval) fleas] [hatching eggs (larvae)]. Kills hatching fleas [preadult (larval) fleas] [hatching eggs (larvae)] before they grow up to bite. [NYLAR®] [brand name] the insect growth regulator in this fogger, continues to kill (control) hatching fleas [preadult (larval) fleas] [hatching eggs (larvae)] for [210 days] [30 weeks] [7 months] by preventing their development into adults. The fogger reaches fleas [and other listed insects] hidden in carpets, rugs, drapes, upholstery, pet bedding, floor cracks and open cabinets. Occasionally adult fleas may be present in treated areas when reintroduced from infested animals.

To protect your pet against and to minimize reintroduction of adult fleas from outdoors, use EPA registered flea and tick products, [brand name] flea or flea and tick collar, [brand name] pet dust, [brand name] pet spray, [brand name] pet dip, [brand name] pet shampoo, flea shampoo or flea and tick pet shampoo, in conjunction with this application and prior to re-entry. As part of a complete flea control program use EPA registered [brand name] outdoor [lawn] [home and garden] spray, [brand name] [pressurized] [Ready-to-Use] [RTU] flea and tick [indoor] [premise] spray.

Kills [controls] insects [on contact] [such as]:

Cockroaches [adults (nymphs)]	Sowbugs	Fleas [adults (larvae) (eggs) (preadult)]
Smokey Brown Cockroaches [adults (nymphs)]	Millipedes	Ticks [that may carry and transmit Lyme Disease]
Brown Banded Cockroaches [adults (nymphs)]	Beetles	Brown Dog Ticks
Asian Cockroaches [adults (nymphs)]	Ground Beetles	Long Star Ticks
German Cockroaches [adults (nymphs)]	Elm Leaf Beetles	Deer Ticks
American Cockroaches [adults (nymphs)]	Boxelder Bugs	Other Ixodid Species
Australian Cockroaches [adults (nymphs)]	Earwigs	American Dog Ticks
Waterbugs [adults (nymphs)]	Lice	Gulf Coast Ticks
Palmetto Bugs [adults (nymphs)]	Pillbugs	Foraging Ants [Fire Ants] [Pharaoh Ants]
	Clover Mites	Carpenter Ants [Eastern (Western)]
	Dermestids [Carpet Beetles (Trogoderma)]	Centipedes
Granary Insects	Midges	Flying Moths [small]
Flat Grain Beetles	Flies	Almond Moths
Caddisflies	Gnats	Chocolate Moths
Flour Beetles	Cluster Flies	Tobacco Moths
Cigarette Beetles	Mosquitoes	Indian Meal Moths
Drugstore Beetles	Sciarid Flies	Indian Mealworms
Lesser Grain Borers	Firebrats	Angoumois Grain Moths
Merchant Grain Beetles	Silverfish	Hornets
Saw-toothed Grain Beetles	Booklice	Carpenter Bees
Grain Weevils	Bedbugs	Wasps
Warehouse Beetles	Wood Borers (exposed stages)	Yellow Jackets [Eastern (Western)]
Red Flour Beetles	Grain Mites	Cheese Mites

For use in: Apartments, Attics, Basements, Boats, Cabins, Campers, Closed Porches, Condominiums, Dormitories, Drive-Ins, Drugstores, Factories, Food Plants, Garages, Homes, Hospitals, Hotels, Institutions, Kennels, Kitchens, Motels, Nursing Homes, Office Buildings, Other Public Buildings, Pet Grooming Parlors, Pet Sleeping Areas, Railroad Cars, Restaurants, Rooms, Schools, Ships, Storage Areas, Supermarkets, Theaters, Trailers, Tree houses, Trucks, Verandas, Warehouses, and Zoos.

DIRECTIONS FOR USE

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

READ ALL DIRECTIONS COMPLETELY BEFORE USE

For use only when building has been vacated by human beings and pets. Ventilate area for 30 minutes before re-entry.

For best results, treat all infested areas [sites]. Use one fogger for each 6,000 cubic feet (approximately 27 ft x 27 ft x 8 ft ceiling) of unobstructed area. Use additional units for remote rooms or where the free flow of fog is not assured.

PREPARATION:

DO NOT use more than one fogger per room. DO NOT use in small, enclosed spaces such as closets, cabinets or under counters or tables. Do not use in a room 5 ft. X 5 ft. or smaller; instead, allow fog to enter from other rooms. **Turn off ALL ignition sources such as pilot lights (shut off gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.).** Call your gas utility or management company if you need assistance with your pilot lights.

Remove or cover exposed food, dishes, utensils, surfaces and food-handling equipment. Shut off fans and air conditioners. Close outside doors and windows. Remove pets and birds but leave pets' bedding as this is a primary hiding place for fleas and must be treated for best results. No need to discard pet bedding after treatment. Cover or remove fish tanks and bowls. Leave rugs, draperies and upholstered furniture in place. This product will not harm furniture when used as directed. Open interior closet doors and cabinets or areas to be treated. [Cover waxed wood floors and waxed furniture in the immediate area surrounding the fogger.] (Newspapers may be used).

For more effective control of storage pests [Flour Beetle, Cigarette Beetle, Drugstore Beetle, Lesser Grain Borer, Merchant Grain Beetle, Saw-toothed Grain Beetle, Grain Weevil, Warehouse Beetle, Red Flour Beetle, Confused Flour Beetle] and Cockroaches [Smokey Brown Cockroach, Brown Banded Cockroach, Asian Cockroach, German Cockroach, American Cockroach, Australian Cockroach], [Crickets, (Waterbugs) (Palmetto Bugs) open all cupboard doors [kitchen, bathrooms, pantry], and drawers for better penetration of fog. Remove all infested foodstuffs and dispose of in outdoor trash.

For flea and tick control, thoroughly vacuum all carpeting, upholstered furniture, along baseboards, under furniture and in closets. Put vacuum bag into a sack and dispose of in outside trash. Mop all hard floor surfaces.

READ ALL DIRECTIONS AND CAUTIONS BEFORE USING

TO START FOGGING: SHAKE FOGGER WELL BEFORE USE: Hold can at arm's length with top of can pointing away from face and eyes. Push down on finger pad until it locks. This will start fogging action. Set canister in an upright position on a table, stand, etc. (up to 30 inches in height in the center of the area) and place several thicknesses of newspaper under the canister to prevent marring of the surface. Treat the whole dwelling using multiple units in homes with more than one level and numerous rooms. Leave the building at once.

DO NOT RE-ENTER BUILDING FOR TWO HOURS. After two hours, open all outside doors and windows, turn on air conditioners and/or fans and let treated area air for 30 minutes before reoccupying. If additional units are used for remote rooms or where free flow of fog is not assured, increase airing-out time accordingly.

STORAGE AND DISPOSAL	
STORAGE:	Store in a cool, dry place. Keep container closed.
DISPOSAL:	Do Not Puncture or Incinerate!
If empty:	Place in trash or offer for recycling if available.
If partly filled:	Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

Net Weight _____

Manufactured by:

Mc LAUGHLIN GORMLEY KING COMPANY
8810 Tenth Avenue North
Minneapolis, MN 55427