



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 26, 2013

Mr. Thomas A. Lennan
Regulatory Affairs Specialist
McLaughlin Gormley King Company
8810 Tenth Avenue North
Minneapolis, MN 55427-4319

**Subject: Amended Labeling; Direct Response to EPA Letter Dated May 22, 2013
MGK® EVERCIDE® Total Release Aerosol 2614, EPA Reg. No. 1021-1674
Your E-Submissions Dated May 23, 2013 & July 18, 2013**

Dear Mr. Lennan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

General Comment(s):

1. To facilitate inclusion of required label language from the Agency's guidance "Update on Required Label Language for Indoor Total Release Fogger Products," dated July 6, 2011, now that the pictograms for all total release fogger (TRF) products have been finalized by the Agency, you must include the approved pictograms when you must submit your updated final label in response to this SAL.

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s), top of page 2 of 6:

2. To facilitate inclusion of required label language from the REDs for pyrethrins, esfenvalerate, pyriproxyfen, piperonyl butoxide, and MGK-264 insecticide synergist, you must insert the word "hands" immediately following the word "Wash."

Directions for Use, USE RESTRICTIONS subsection comment(s), bottom of page 3 of 6:

3. To facilitate inclusion of required label language from the REDs for pyrethrins, esfenvalerate, pyriproxyfen, piperonyl butoxide, and MGK-264 insecticide synergist, you must revise and CAPITALIZE the 3rd bulleted use restriction to read "THIS PRODUCT IS FOR INDOOR RESIDENTIAL/NON-RESIDENTIAL USE ONLY."

Directions for Use section comment(s), bottom of page 4 of 6:

4. To facilitate inclusion of required label language from the Agency's guidance "Required Label Language for Indoor Total Release Fogger Products," dated March 23, 2010, and "Update on Required Label Language for Indoor Total Release Fogger Products," dated July 6, 2011, within the 2nd sentence of the "TO START FOGGING:" subsection, you must replace the words "time date" with the words "time and date."

Storage & Disposal section comment(s), middle of page 5 of 6:

5. Revise the subsection heading "Pesticide Disposal and Container Handling:" to read "Container Disposal:"

To properly facilitate inclusion of required label language from the Agency's guidance "Required Label Language for Indoor Total Release Fogger Products," dated March 23, 2010, and "Update on Required Label Language for Indoor Total Release Fogger Products," dated July 6, 2011, you must include label statements in both English and Spanish. Verify that the Spanish language text is true and accurate translation of the English text, and submit a verification statement to EPA. Include both language versions of the labeling on the product container. In addition, the Agency recommends that MGK Company: (1) Adopt smaller unit sizes (2 oz versus the standard 6 oz), since the subject label lists container sizes ranging from 2 to 6 ounces; (2) Utilize a time-delayed release mechanism (3-5 seconds); and (3) Switch to non-flammable propellants.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely Yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure: Label Stamped "Accepted with Comments," dated July 26, 2013
001021-01674 D477304 & D479668

EVERCIDE® Total Release Aerosol 2614

Contains NYLAR® Insect Growth Regulator

[THIS LABEL WILL BE AVAILABLE IN SPANISH]
[RESIDENTIAL USE ONLY]

[] 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 [killing insects] insect control

[Nylar®] [brand name] keeps working in areas exposed to the sun

Inhibits flea 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] against fleas

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, Bedbugs and other listed insects

Also kills Deer Ticks and other listed Ixodid species that may carry and transmit Lyme Disease

[Num] Pack. Contains [Num] ___oz. Foggers.]

Contains an odor neutralizer [eliminator][remover]

Odor Neutralizing [Eliminating][Removing] Technology [Formula]

Neutralizes [Eliminates][Removes] pet odors [including urine]

Neutralizes [Eliminates][Removes] pet odors and leaves a clean, fresh scent

[Contains] Pet [Urine] Odor Eliminator [Remover]

Removes Pet [Urine] Odor

[Leaves a] Clean, Fresh Scent

[Leaves a] Mountain Fresh Scent

[Leaves a] Fresh Meadow Scent

[ONE (2 Ounce) CANISTER OF FOGGER (EACH CAN) TREATS A ROOM UP TO 16 ft. x 16 ft. WITH AN 8 ft. CEILING OR 2,000 CUBIC FEET OF UNOBSTRUCTED SPACE.]

[ONE (3 Ounce) CANISTER OF FOGGER (EACH CAN) TREATS A ROOM UP TO 20 ft. x 20 ft. WITH AN 8 ft. CEILING OR 3,000 CUBIC FEET OF UNOBSTRUCTED SPACE]

[ONE (4 Ounce) CANISTER OF FOGGER (EACH CAN) TREATS A ROOM UP TO 22 ft. x 22 ft. with an 8 ft. CEILING OR 4,000 CUBIC FEET OF UNOBSTRUCTED SPACE.]

[ONE (5 ounce) CANISTER OF FOGGER (EACH CAN) TREATS A ROOM UP TO 25 ft. x 25ft. with an 8 ft. CEILING OR 5,000 CUBIC FEET OF UNOBSTRUCTED SPACE.]

[ONE (6 Ounce) CANISTER OF FOGGER (EACH CAN) TREATS A ROOM UP TO 27 ft. x 27 ft with an 8 ft. CEILING OR 6,000 CUBIC FEET OF UNOBSTRUCTED SPACE.]

ACTIVE INGREDIENTS:

Pyrethrins	0.05%
(S)-cyano(3-phenoxyphenyl)methyl-(S)-4-chloro-alpha-(1-methylethyl)benzeneacetate	0.10%
* Piperonyl butoxide	0.10%
** N-Octyl bicycloheptene dicarboximide	0.16%
2-[1-Methyl-2-(4-phenoxyphenoxy) ethoxy] pyridine	0.10%
OTHER INGREDIENTS	99.49%
	100.00%

* (butylcarbityl) (6-propylpiperonyl) ether and related compounds

** MGK® 264, Insecticide Synergist

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF ON SKIN

▪ Take off contaminated clothing.

OR

▪ Rinse skin immediately with plenty of water for 15-20 minutes.

CLOTHING:

▪ Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns), you may call 1-888-740-8712.

ACCEPTED
Manufactured by With COMMENTS
In EPA Letter Dated:

July 26, 2013

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No.

1021-1674

4/8



8810 Tenth Avenue North
Minneapolis, MN 55427

EPA Reg. No. 1021-1674

EPA Est. No. 1021-MN-2

Net Weight _____

Federal regulations prohibit
CFC propellants in aerosols



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

CAUTION

Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PHYSICAL OR CHEMICAL HAZARDS

Highly Flammable Ingredient



Ingrediente Altamente Inflamable

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 [kills] listed insects when used as directed. 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 Pyrethrins, a botanical insecticide derived from the Chrysanthemum flower, which provides effective, quick-kill of listed insects upon direct contact, and has 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] the following listed insects:

Cockroaches [adults]	Sowbugs	Fleas [adults (larvae)]
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(nymphs)]		(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	Lone 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)]
	Dermeestids [Carpet Beetles (Trogoderma)]	Centipedes
Granary Insects	Midges	Flying Moths [small]
Flat Grain Beetles	Flies	Almond Moths
Cadelles Rice Weevils	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 indoors In:
 Apartments, Attics, Basements, Boats, Cabins, Closed Porches, Condominiums, Garages, Homes,
 Kitchens, Pet Sleeping Areas, Rooms.

DIRECTIONS FOR USE

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

[STOP!] READ ENTIRE LABEL BEFORE EACH USE.

USE RESTRICTIONS

- Apply this product only as specified on this label.
- Do not contaminate food or feedstuffs.
- This product is Intended for indoor residential/non-residential use only.
- Do not use in aircraft cabins.
- For use only when building has been vacated by human beings and pets.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- Do not remain in treated area. Exit area immediately and remain outside the treated area until aerosols, vapors, and/or mists have dispersed. Wait two (2) hours after application, and then open windows, vents and doors for two (2) hours. If an odor is still detected, additional ventilation is required.

Do not use in food areas of food handling establishments, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is operation. Serving areas are areas where food is served, such as dining rooms, but excluding areas where foods may be prepared or held. Prior to space spray applications, cover or remove food, and cover food processing surfaces or clean after treatment and before use. Do not apply more than 1 time per day.

- Remove pets, birds, and cover fish aquariums before use.

To Use This Product Correctly: one canister of fogger will treat a room up to 16 ft. x 16 ft with an 8 ft. ceiling or 2,000 cubic ft. of unobstructed space [20 ft. x 20 ft. with an 8 ft. ceiling or 3,000 cubic ft. of unobstructed space] [22 ft. x 22 ft. with an 8 ft. ceiling or 4,000 cubic ft. of unobstructed space][25 ft. x 25ft. with an 8 ft. ceiling or 5,000 cubic feet of unobstructed space.][27 ft. x 27 ft. with an 8 ft. ceiling or 6,000 cubic feet of unobstructed space.]

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. **Use of a fogger in an enclosed space may cause the product to explode, resulting in injury to people or damage to property.**

EPA PRE-APPROVED PICTOGRAM 1 representing "Do Not Use Multiple Canisters in a room"
EPA PRE-APPROVED PICTOGRAM 2 representing "Do Not Use in Small Confined Spaces"

Before you Fog:

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 and birds, cover and turn off fish aquariums before activating canister. Shut off all exhaust fans and close all windows, doors, and ventilators.

EPA PRE-APPROVED PICTOGRAM 3 representing "Unplug and Turn off ignition sources"
EPA PRE-APPROVED PICTOGRAM 4 representing "No flames or pilot lights"
[EPA PRE-APPROVED PICTOGRAM 5 representing "Remove or Cover Exposed Food"]

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. Cover wood floors and wood furniture in the immediate area around fogger with newspapers or a drop cloth. Open cabinets, cupboards, drawers, closets, and doors in areas to be treated. Place a chair, small table, or stand in the center of the room to be treated, and cover with newspaper. For best results, treat all infested areas [sites].

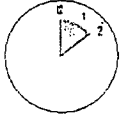
Fill out and place hang-tag on the door to the treated area to alert family and others with access to the treated area not to enter for two (2) hours

TO START FOGGING: SHAKE WELL BEFORE USE. KEEP CONTAINER UPRIGHT.

Immediately before activating canister, complete the door hang tag by filling in the time date to instruct people not to enter the treated area (premises) for at least two (2) hours following the time of activation. Hang the tag on the door to the entrance. Point the canister away from face and eyes when releasing (canister sprays straight up). To lock valve in open position for automatic discharge, press valve button down firmly, until it snaps into place. [Break off and remove tab on side of sprayer. Tilt canister away from face (container sprays straight up).] Once the canister has been activated, place the canister on the chair, small table, or stand (that is covered by newspaper) in the center of the room to be treated."

DO NOT remain in treated area. Vacate the treated house, individual apartment unit or other structure immediately.

Do not Re-enter for 2 hours



Airing Out: Wait two (2) hours after application, then open windows, vents and doors for two (2) hours. If an odor is still detectable, additional ventilation is required

[EPA PRE-APPROVED PICTOGRAM 6 representing "Air Out Room Before Entering"]

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, pantries], 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.

STORAGE AND DISPOSAL

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

Pesticide Storage:

Store this product in a cool, dry (preferably locked) place away from heat or open flame, and in an area that is inaccessible to children and animals.

Pesticide Disposal and Container Handling:

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 for disposal instructions.

[In case of emergency, Call: [phone number]]

[For additional information, Call: [phone number]]

[DOOR HANG TAG LANGUAGE:]

DO NOT ENTER UNTIL: _____ ON THIS DATE: _____

[DO NOT ENTER UNTIL _____ ON _____ NO ENTRE HASTA LAS _____ ÉL _____

FILL OUT AND PLACE HANG-TAG ON THE DOOR TO THE TREATED AREA TO ALERT FAMILY AND OTHERS WITH ACCESS TO THE TREATED AREA NOT TO ENTER FOR 2 HOURS.

LLENE Y GUINDE LA ETIQUETA EN LA PUERTA DEL ÁREA QUE VA A SER TRATADA PARA ALERTAR A LOS FAMILIARES Y OTROS CON ACCESO AL ÁREA PARA QUE NO ENTREN POR 2 HORAS.]