



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

September 21, 2005

Julie B. Schlekau  
McLaughlin Gormley King Company  
8810 Tenth Avenue North  
Minneapolis, MN 55427

Subject: Amendment - Response to Agency's May 9, 2005 letter  
EVERCIDE Esfenvalerate .025% RTU CS  
EPA Reg. No. 1021-1816  
Your Submission Dated May 9, 2005

Dear Ms. Schlekau:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, 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. Since you are requesting to carry the first aid, *If Swallowed* statement for products containing petroleum distillates, please make the following revisions:
  - a. Add "Contains Petroleum Distillates" under the Ingredients Statement.
  - b. Add "Note to Physician: Contains petroleum distillate - vomiting may cause aspiration pneumonia." to the First Aid Statement.
2. Add under bedbugs "Cover mattresses before use." This instruction is for after the consumer has applied the product to the mattress. They are to wait until the mattresses dries and then place a mattress cover or sheet on before they use it again.

3. On the front panel add "For Residential Use Only".

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



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



McLAUGHLIN  
GORMLEY  
KING COMPANY

8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4372 U.S.A. - Telephone (763) 544-0341

**READY-TO-USE INDOORS & OUTDOORS**

Kills Home Invading Pests On Contact.

Kills Ants, Cockroaches, Spiders, Fleas, and Ticks (including ticks which may transmit Lyme Disease).

Kills Cockroaches for up to 12 weeks (3 months).

Kills Adult, Pre-Adult (larvae) Fleas and their hatching eggs for up to 8 weeks (2 months).

Water-based, Non-Staining, No Oily Residue.

Economical Do-it-Yourself Pest Control/Trigger Sprayer Included

**ACTIVE INGREDIENT:**

|   |          |
|---|----------|
| (S)-cyano(3-phenoxyphenyl)methyl-(S)-4-chloro-alpha-(1-methylethyl)benzeneacetate ..... | 0.025%   |
| OTHER INGREDIENTS .....   | 99.975%  |
|   | 100.000% |

EVERCIDE® - Registered trademark of McLaughlin Gormley King Co.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

**FIRST AID**

|  |   |
|--|---|
| <b>IF SWALLOWED:</b>   | <ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</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> |
| <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 eyes.</li> <li>• Call a poison control center or doctor for 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>   |
| <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> |   |

Net Contents \_\_\_\_\_

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

EPA Reg. No. 1021-1816

EPA Est. No. 1021-MN-2

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

SEP 21 2005

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

1021-1816

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

**CAUTION**

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish and other aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not use or store near heat or open flame. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

**DIRECTIONS FOR USE**

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

EVERCIDE® Esfenvalerate 0.025% RTU CS is an effective formulation that kills crawling insects fast. It stays on treated surfaces and provides residual insect killing power for up to three months.

**READ ENTIRE LABEL BEFORE USE**

Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. In the home, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment. Cover or remove exposed food/feed.

**PRECAUTIONS:** People and pets should not be allowed in treated areas until spray has dried. Do not use this product on pets.

**NOTICE:** Buyer assumes all responsibility for safety and use not in accordance with directions.

3/4

**Sprayer Instructions:**

How to prime and care for your sprayer:

1. After vigorously shaking product, remove cap from container and replace with sprayer hose and cap assembly. Tighten securely.
2. Turn sprayer nozzle one half turn counter-clockwise. Hold sprayer below the level of container and prime by pumping trigger 10 – 15 times until product is dispensed. Adjust nozzle to fine spray or jet stream as needed.
3. To store, turn nozzle to "off" position and store with sprayer above level of liquid in container to prevent leakage.

**SHAKE WELL BEFORE USE**

Typical Areas That May Require Insecticide Treatment:

**INDOORS:**

Spray areas where Ants, Cockroaches, Clover Mites, Crickets, Earwigs, Firebrats, Millipedes, Palmetto Bugs, Psocids, Silverfish, Sowbugs, Spiders and Water Bugs are found or normally reside, including dark corners of rooms and closets; cracks and crevices in walls; along and behind baseboards; beneath and behind sinks, stoves, refrigerators, and cabinets; and around plumbing and other utility installations.

For control of Carpet Beetles, thoroughly spray along baseboards and edges of carpeting, under carpeting, rugs and furniture, in closets, on shelving, and wherever else insects are seen or suspected.

Note: Check carpet manufacturer's warranty and care and maintenance information before using product on your specific brand of carpeting.

**To Kill Brown Dog Ticks and Fleas:** For Control of Brown Dog Ticks, thoroughly apply as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames and localized areas of floor and floor coverings where these pests may be present. For control of Fleas, thoroughly apply a fine particle broadcast spray to infested rugs, carpets, and pet resting areas. Prior to treatment, aquariums and fish bowls should be covered and birds, such as canaries, removed from the area. Do not permit humans or pets to contact treated surfaces until the spray has dried. Old bedding should be removed and replaced with clean, fresh bedding after treatment. Do not treat pets with this product. To control the source of flea infestations, pets should be treated with a product registered for application to animals. Also, treat your yard with a product registered for yard application.

**To Kill Bedbugs:** Apply as a spot treatment to cracks and crevices, and around baseboards, floorboards, headboards, and walls. First, thoroughly clean and air mattresses and springs. Then spot treat only areas that may harbor pests. On mattresses, concentrate on tufts, folds, and seams. Allow all areas to thoroughly dry before use.

For Ants, apply to ant trails; around doors and windows; and wherever Ants may find entrance.

**To Kill Carpenter Ants:** Use a coarse spray, around doors, doorframes, windows, and other areas where these ants enter the premises or hide. Spray into cracks and crevices through openings or small, newly drilled holes into wall voids where these ants or their nests are present.

Typical Areas That May Require Insecticide Treatment:

**OUTDOORS:**

**GENERAL:** Use EVERCIDE® Esfenvalerate 0.025% RTU CS to control Ants, Cockroaches, Crickets, Sowbugs, Spiders, and Ticks on contact. Apply to outside surfaces of buildings, porches, patios, garages, grasses, and other areas where these pests have been seen or are found. Do not spray in or near fish ponds or other bodies of water. Avoid soaking young or flowering plants.

**Flies and Mosquitoes:** For outdoor use only as an aid in controlling these insects. Spray outside surfaces of screens, doors, window frames, or wherever insects may enter the room. Also spray surfaces around light fixtures, on porches, in garages, and other places where insects alight or congregates.

**Ants, Ticks (including ticks which may transmit Lyme disease), Crickets, Fleas, and Earwigs:** For treatment of infestation of these insects in areas where there are weeds or bushy non-crop areas, spray infested areas thoroughly. When treating for Ticks, give special attention to areas frequented by pets. For Ants, thoroughly wet hills and runways.

**Building Perimeter Treatment:** To help prevent infestations of buildings by Ants, Crickets, Spiders, and Sowbugs (Pillbugs), treat a 12 – 18 inch band of soil or other substrate adjacent to buildings and the building foundation to a height of 2 – 3 feet where these pests are active and may find entrance.

Keep pets and children out of the treated area until after the spray has dried. Do not spray animals. Dogs, cats, and their kennel or bedding area should also be treated with a registered flea control product in conjunction with this application.

**STORAGE AND DISPOSAL**

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

**STORAGE:** Store in a warm, dry place. Keep container closed.

**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 agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.