

1021-1871

05/14/2008

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U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

1021-1871

Date of Issuance:

MAY 14 2008

NOTICE OF PESTICIDE:

Registration
 Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Dry PyGanic® 1.0%

Name and Address of Registrant (include ZIP Code):

Mr. Daniel J. Barringer, Registration Specialist
McLaughlin Gormley King Company
8810 Tenth Avenue North
Minneapolis, MN 55427-4319

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.

(continued on page 2)

Signature of Approving Official:

Refer to Page #5

Richard J. Gebken, Product Manager (10)
Insecticide Branch, Registration Division (7505P)

Date:

MAY 14 2008

2. Make the following changes to the label:

- a. Change the product registration number to "EPA Reg. No. 1021-1871"
- b. Label revisions:

General Statement:

- 1. In all instances, remove the phrases 'but not limited to' and 'such as' from the proposed label.

OMRI Review comment(s):^{1 2}

- 2. The inert ingredients listed in the end-use product are all listed on the 2004 List 4 and would be allowed for National Organic Program (NOP) use. However, the manufacturing-use product contains an inert ingredient³ which is **not allowed** under the NOP. This inert is classified as List 3, on the 2004 List Systems. A resubmission would be considered for NOP eligibility if this ingredient was not present.
- 3. The proposed marketing statement "Contains Pyrethrins the botanical insecticide extracted from Pyrethrum flowers. Meets National Organic Program (NOP) requirements for use in Certified Organic Production" is **not allowed** under PR Notice 2003-1. Please revise this marketing statement to read: "Contains Pyrethrins, a botanical insecticide."

First Aid section comment(s):

- 4. Replace the 2nd sentence in the last row of the First Aid section (table) with: "For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-888-740-8712."⁴

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s):

- 5. Replace the 3rd sentence in this section with: "Wash hands thoroughly with plenty of soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet."

Precautionary Statements, PPE subsection comment(s):

- 6. Add the following text immediately following the PPE 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."

Precautionary Statements, Environmental Hazards section comment(s):

- 7. Replace the 1st paragraph with: "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 wash-waters or rinsate. See Directions for Use for additional precautions and restrictions."
- 8. In the 2nd paragraph, delete the first 2 sentences. The language "Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other

¹ For more detailed information, please refer to the OMRI review for this product.

² For more detailed information, please refer to PR Notice 2003-1.

³ Refer to the Agency's OMRI review for specific information regarding this inert ingredient.

⁴ Please note that the "1-888-740-8712" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES).....” is only required on containers larger than 50 lbs.

Directions for Use section comment(s):

- 9. Delete the 4 lines of text at the bottom right-hand corner of page 1 of 6 immediately following the statement “It is a violation of ...” and insert the following new subsection:

“GENERAL PRECAUTIONS AND USE RESTRICTIONS

- 10. Apply this product only as specified on this label.
 - Aerial applications are prohibited.
 - Applications with power duster equipment are prohibited.
 - Do not apply this product in a way that will contact workers or other persons, either directly or through drift.
 - Only protected handlers may enter treated area during application.
 - Do not allow adults, children or pets to enter the treated area until dusts have settled.
 - For use outdoors, do not apply directly to or near water, storm drains or drainage ditches. Do not apply when windy. To prevent product run-off, do not over-water the treated area(s) or apply when heavy rain is expected.
 - Do not apply this product in a way that will contact adults, children or pets, either directly or through drift.
 - 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. Do not use in serving areas while food is exposed.
 - In Food Areas of Food Handling Establishments: Avoid contamination of food or feedstuffs. During applications, cover or remove food. Cover food processing surfaces and equipment or clean after treatment with a suitable detergent and rinse with potable water before use. Do not use in serving areas (dining areas where prepared foods are served) while food is exposed or facility is in operation.
 - Do not use in aircraft.
 - Remove pets, birds and cover fish aquariums before application.”

On page 2 of 6

- Delete the 7 lines of text at the top left-hand corner immediately following the NON-AGRICULTURAL USE REQUIREMENTS box. This text will be replaced with new text to be inserted as part of the new “**GENERAL PRECAUTIONS AND USE RESTRICTIONS**” section.

Directions for Use section comment(s), continued:

- 11. Within the “INDOOR AREAS” subsection, incorporate the following changes:
 - Remove the use pattern “Stored Food in Multi-walled Paper or Cloth Bags” as per recent revisions to 40 CFR §180.128 (copy enclosed), dated January 29, 2008, and the RED discusses the application to food stored in bags for space sprays only. Page 92.
 - Revise the use pattern “Transportation Equipment” to read: “Transportation Equipment (except Aircraft)”
- 12. Within the “Food and/or Feed areas” subsection, delete the words “... but not excluding areas where food may be prepared or held.” at the end of the 2nd sentence.
- 13. Replace the subsection title currently listed as “Stored Product Pests” with “Stored Product Pests in Non-Food/Non-Feed Areas” This non-food/non-feed area clarification is necessary because the prohibition statement directly above limits applications to crack and crevice only, and the statement within this paragraph is contradictory, as it discusses an application rate of in square feet of surface area, and applications to vertical surfaces in “affected area” In addition, remove the statement “or as necessary for control.”
- 14. In the 6th sentence of the “Stored Product Pests in Non-Food/Non-Feed Areas” subsection, replace the words “This product may also be applied” with the word

“Apply”

- 15. At the end of paragraph 2 within the “**For Use in Storage Sites:**” subsection, delete the words “... and other areas where insects hide or travel.”
- 16. “**For Use on Stored Commodities:**” Section:
Remove this entire section, since the Agency has not reviewed or assessed during the RED process, any dust formulations for use as a post harvest application to stored food commodities.
- 17. At the end of the “**Fleas, Ticks, Mites and Lice:**” subsection, insert the following text:
“Do not treat dogs and/or cats with this product.”
- 18. Replace the last sentence of the “**Bed Bugs:**” subsection with: “If bed bugs are present, treat with an insecticide approved for use on bed bugs.”
- 19. On page 5 of 6, replace the section currently titled as “**IMPORTANT NOTE:**” with “**PHYTOTOXICITY:**”
- 20. On page 6 of 6, replace the section currently titled as “**ON-ANIMAL USE:**” with “**DOMESTIC ANIMAL USE:**”

Storage and Disposal section comment(s):

- 21. Revise the line labeled as “STORAGE:” to read “PESTICIDE STORAGE:”

b. Efficacy related issues:

Revise the label incorporating the following revisions as required by the efficacy review as follows: ⁵

- **German Cockroaches.** A product application rate of 31 oz./1,000 ft² is effective. Application rates below 31 oz./1,000 ft² and all Directions for Use, should be removed from the proposed label for treatment of German cockroach infestations. The data support ‘kills’ claims only. All knockdown claims for cockroaches should be removed from the label.
- **Cat fleas.** The data only support the addition of cat fleas with a ‘kills’ claim to the proposed label. Please clarify how a treatment of 0.3g of product applied per unknown unit area in the submitted study applies to labeling and use against the cat flea. The label must specify an equivalent rate, but the study does not state what that rate is. Otherwise, the data only support ‘direct treatments.’
- **Bed Bugs.** The data support a ‘kills bed bugs’ claim when applying the product at a rate of 1,330g/1,000 ft² (46.91 oz./1,000 ft²). Please clarify how much material is needed to treat a bed or an area to kill bed bugs in order for the applicator to apply the correct amount of product.
- **Deer or Blacklegged Tick Nymphs.** The data support the addition of deer or blacklegged ticks to the label only when applied at the rate of 0.42g/ft², equivalent to 422g/1,000 square feet. Remove all other ticks and related directions for use from the label.
- Remove the following pests from the proposed label and associated directions for use because either the submitted data do not demonstrate the efficacy of the proposed product against these pests or there were no data cited or submitted to support their addition to the label. The submitted data do not support the addition of the following pests to the proposed label: cellar spiders/spiders, black carpenter/carpenter ants, bark scorpions/scorpions, dry wood termites, lice, brown dog ticks, chigger bugs, tabanidae, cockroaches and blood sucking lice.
- The re-application intervals on the label were not accompanied by any explanation of how they were determined. Specific re-application intervals must be addressed as per the RED document for pyrethrins.
- The livestock and animal buildings together with the direct animal treatments do not list pests. The Directions for Use refer the applicator to the list of pests instead. In reviewing the list of these pests, there are very few livestock and poultry pests included; therefore, what are these treatments intended to kill?

⁵ For more detailed information, please refer to pages 6-7 of 7 of the efficacy review for this product.

3. Confirmatory Data Requirements:

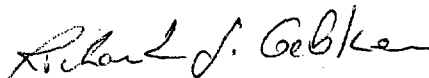
- Data deficiencies were identified for storage stability and corrosion characteristics in the product chemistry review for this product. Therefore, MGK Company is obligated to submit a One Year Storage Stability (830.6317) study and a Corrosion Characteristics (830.6320) study on this product in support of this registration within one (1) year from the date of this registration.⁶

- 4. Submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment.

MGK Company should note that a notice of availability of EPA's reregistration eligibility decision (RED) document for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). As a result, additional data and/or labeling changes may be required for products containing pyrethrins.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

A stamped "Accepted" copy of the label and hard copies of the acute toxicity, efficacy, OMRI and product chemistry reviews for this product as well as copies of PR Notice 73-4, PR Notice 2003-1 and a copy of recent revisions to 40 CFR §180.128 are enclosed for your records.



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Enclosures
001021-01871 D385573

⁶ For more detailed information, please refer to page 2 of 3 of the product chemistry review for this product.



McLAUGHLIN
GORMLEY
KING COMPANY

8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4319 U.S.A. - Telephone (763) 544-0341

FOR ORGANIC PRODUCTION



Contains Pyrethrins the botanical insecticide extracted from Pyrethrum flowers
Meets National Organic Program (NOP) requirements for use in Certified Organic
Production

May be used on livestock animals and livestock premises

ACTIVE INGREDIENTS:

Pyrethrins 1.00%

OTHER INGREDIENTS 99.00%

100.00%

PYGANIC® - Registered trademark of McLaughlin Gormley King Company

0.01 lbs. active ingredient per lbs. of Dry PyGanic® 1.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF ON SKIN OR CLOTHING:

- 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.

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 1-888-740-8712.

Net Contents _____

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

EPA Reg. No. 1021-XXXX

ACCEPTED
with COMMENTS

EPA Est. No. 1021-MN-2

In EPA Letter Dated

MAY 14 2008

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

1021-1871

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through skin. 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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, Loaders Applicators, and other handlers must wear the following:

- long-sleeve shirt
- long pants
- shoes and socks

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or 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 washwaters or rinsate.

Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. This pesticide is toxic to fish and other aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store 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.

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 area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

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NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR, Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not enter or allow others to enter until dusts have settled.

AERIAL APPLICATIONS ARE PROHIBITED.
 APPLICATIONS WITH POWER DUSTER EQUIPMENT ARE PROHIBITED.
 DO NOT ALLOW ADULTS, CHILDREN, OR PETS TO ENTER THE TREATED AREA UNTIL DUSTS HAVE SETTLED.
 DO NOT APPLY DIRECTLY TO OR NEAR WATER, STORM DRAINS, OR DRAINAGE DITCHES. DO NOT APPLY WHEN WINDY. TO PREVENT PRODUCT RUN-OFF, DO NOT OVER WATER THE TREATED AREA(S) OR APPLY PRIOR TO HEAVY RAINFALL.

For the Control or Reduction of Exposed Insects and Related Pests including, but not limited to:

Asian Pine Tip Moths	Adelgids	Alfalfa Weevil	Almond Moth
American Black Flour Beetle	Carrion Beetles	Angoumois Grain Moths	Ants
Aphids	Apple Maggot	Armyworms	Asian Cerambycid Beetles
Asian Lady Beetle	Bagworm	Barn Flies	Bat Bugs
Bean Beetles	Bean Weevils	Bed Bugs	Beet Armyworms
Beetles	Birch Leafminer	Black Carpet Beetles	Black Fungus Beetles
Black Turpentine Beetles	Black Vine Weevil	Blister Beetles	Blood Sucking Lice
Blow Flies	Booklice	Bottle Flies	Boxelder Bugs
Broadhorned Flour Beetles	Broadnosed Grain Weevils	Brown Dog Ticks	Brown Spider Beetles
Brown Spruce Longhorn Beetle	Budworms	Bugs	Cadelles
California Oakworm	Cankerworms	Carpenter Ants	Carpet Beetles
Carrot Weevil	Caterpillars	Catorama Beetles	Centipedes
Cereal Beetles	Cheese Mites	Cheese Skippers	Chicken Mites
Chiggers	Chocolate Moths	Chrysanthemum Leaf Miners	Cicadas
Cigarette Beetle	Clearwing Borer	Clothes Moths	Clover Mites
Clover Weevil	Cluster Flies	Cockroaches	Cocoa Bean Moths
Coffee Bean Weevils	Cone Beetles	Cone Worms	Confused Flour Beetle
Conifer Spider Mite (Adult)	Corn Sap Beetles	Cottonwood Borer	Cottonwood Leaf Beetles
Cranbury Girdlers	Crane Flies	Crickets	Cross-striped Cabbageworm
Cucumber Beetles	Cutworms (exposed)	Dark Mealworms	Darkling Beetles (lesser meal worm)
Depressed Flour Beetles	Dermeitid Beetles	Diamondback Larvae	Dingy Cutworm Adult
Douglas Fir Midge	Douglas Fir Tussock Moth	Drain Flies	Dried Fruit Beetles
Drugstore Beetles	Drywood Termites	Earwigs	Eastern Tent Caterpillar
Elmleaf Beetle	Emerald Ash Borer	European Grain	European Pine Tip

		Moths	Moth
European Pine Shoot Moth	Face Flies	Fall Cankerworms	Fall Webworm
Fannia Flies	Field Crickets	Firebrats	Fireworms
Flat Grain Beetles	Flea Beetles	Fleas	Flies
Flying Moths	Foreign Grain Beetles	Forest Tent Caterpillar	Fruit Flies
Fruittree Leafroller	Fungus Beetles	Fungus Gnats	German Cockroaches
Giant Root Aphid	Glassy Winged Sharpshooter	Grain Mites	Granary Insects
Granary Weevils	Grape Leaf Skeletonizer	Grape Leafhopper	Grasshoppers
Greenbugs	Green Fruit Worm	Green Peach Aphid	Greenhouse Thrips
Ground Beetles	Gypsy Moth (adults & larvae)	Hairy Fungus Beetles	Hairy Spider Beetles
Harlequin Bug	Heliothis spp.	Hessian Fly (Adult)	Hide Beetles
Hornworm	Inchworm	Indian Meal Moth	Iris Borer
Pine Engraver	Japanese Beetle	Katydids	Khapra Beetles
Lace Bugs	Large Black Flour Beetles	Larger Cabinet Beetles	Larger Grain Borers
Leafhoppers	Leafminers	Leafrollers	Leaftiers
Lesser Grain Beetles	Lesser Grain Borers	Lesser Meal Worm	Lesser Peach Tree Borer
Longheaded Flour Beetles	Loopers	Lygus Bugs	Maize Weevils
Mealy Bugs	Mediterranean Flour Moths	Merchant Grain Beetles	Mexican Bean Beetle
Mexican Grain Beetles	Millers	Millipedes	Mimosa Webworm
Mole Crickets	Moth Flies	Murmidius Beetles	Mushroom Flies
Nantucket Pine Tip Moth	Northern Fowl Mites	Onion Maggot	Palmetto Bug
Peach Twig Borer	Pear Psylla	Pillbugs	Pine Bark Beetles
Pink Scavenger Caterpillars	Pinworms	Plant Bugs	Plum Curculio
Ponderosa Pine Needle Miner	Poultry Lice	Powder Post Beetles	Psocids
Psyllids	Red Gum Lerp Psyllid	Red Flour Beetles	Red Horned Grain Beetles
Red Lily Beetles	Red Oak Borer	Redbanded Leafroller	Rice Flour Beetles
Rice Moths	Rice Weevils	Root Weevils	Rose Chafer
Royal Palm Bugs	Rusty Grain Beetles	Saw Flies	Saw-Toothed Grain Beetle
Scale (Crawlers)	Seedbugs	Silverfish	Skipper Flies
Skippers	Slenderhorned Flour Beetles	Small Flying Moths	Small Fruit Flies
Smalleyed Flour Beetles	Southern Pine Beetles	Southern Red Mite (Adult)	Sowbugs
Spider Beetles	Spider Mites	Spiders	Spinos Ear Ticks
Spruce Mite (Adult)	Squarenecked Grain Beetles	Stable Flies	Stalk Borers
Stink Bugs	Subtropical Pine Tip Moth	Sun Spiders	Stored Product Pests
Sycamore Leaf Beetle	Tabanidae	Tarnished Plant Bug	Tent Caterpillar
Thrips	Tobacco Moths	Trogoderma Beetles	Two-Banded Beetles

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Vegetable Leaf Miners	Vinegar Flies	Warehouse Beetles	Waterbugs
Webworms	Weevils	Western Pine Tip Moth	White Apple Leafroller
White Marked Spider Beetles	Whiteflies	Wireworms	Yellow Mealworms

READ ENTIRE LABEL BEFORE EACH USE

For most effective results, follow directions for specific use areas.

Avoid contamination of food and feedstuffs

Application Methods:

Apply Dry PyGanic® 1.0% using a dust applicator such as a shaker can, dust gun, puffer or other bulbous duster, hand pump duster, hand operated rotary duster, static charge duster, or other appropriate hand operated duster.

INDOOR USE SITES:

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.

INDOOR AREAS: For use in and around areas such as, but not limited to:

Animal Areas	Freight Containers	Rabbit Houses
Animal Quarters	Fruit Packing Sheds	Rabbit Processing Plants
Apartments	Fruit Processing Plants	Railroad Cars
Asian Markets	Fruit Storage Warehouses	Research Animal Areas
Attics	Fruit Quarantine Areas	Restaurants
Bakeries	Garbage Bins	Rice Mills
Barns	Garbage Cans	Schools
Basements	Garbage Compactors	Seed Storage
Beef Barns	Garbage Trucks	Shade Houses
Beverage Plants	Goat Holding Areas	Sheep Holding Areas
Bins	Goat Houses	Ship Holds
Bottling Plants	Grain Elevators	Ships
Brandy Storage Warehouses	Grain Handling Equipment	Spice Markets
Breweries	Grain Harvesting Equipment	Stable Bins
Brewery Warehouses	Grain Mills	Stables
Buildings Housing Animals	Grain Storage	Storage Areas
Buildings Housing Poultry	Granaries	Storage Bins (areas)
Cabinets	Greenhouses	Storages
Cafeterias	Grocery Stores	Stored Food in Multi-walled Paper or Cloth Bags

Calving Barns	Homes	Stored Product Areas
Canneries	Hog Barns	Stored Products
Cat Sleeping Quarters	Horse Stables	Stored Seed Warehouses
Cattle Barns	Horse Stables and Barns	Stores
Certified Organic Facilities	Horse Trailers	Supermarkets
Cheese Caves	Hospitals	Swine Houses
Citrus Packing Houses	Hotels	Taverns
Coffee Houses	Houses	Tea Houses
Coffee Shops	Indoor Eating Facilities	Textile Mills
Commercial Buildings	Industrial Installations	Tobacco Factories
Condominiums	Industrial Plants	Tobacco Warehouses
Convenience Stores	Institution Dining Areas	Tool Sheds
Crawl Spaces	Institutions	Trains
Dairy and Livestock Barns	Kennels	Transportation Equipment
Dairy Food Processing	Liveries	Tree Nuts Storage Areas
Dairies	Livestock Barns	Truck Trailers
Day Care Centers	Livestock Hauling Equipment	Vegetable Packing Facilities
Delicatessens	Livestock Holding Areas	Vegetable Processing Facilities
Department Stores	Loafing Sheds	Vegetable Storage Facilities
Diners	Meat Markets	Veterinary Clinics
Distilleries	Meat Packaging Plants	Veterinary Hospitals
Dog Houses	Meat Packing Plants	Voids in Attics
Dog Sleeping Quarters	Mess Halls	Wall Voids
Drains & Sewers	Milk Houses	Warehouses
Dried Flower Warehouses	Milk Processing Facilities	Wheat Mills
Dried Food Products in Processing	Milk Rooms	Wholesale Stores
Dried Food Products in Storage	Milk Sheds	Wine Cellars
Dried Fruit Processing Plants	Milking Rooms	Wine Storage Warehouses
Dried Fruit Warehouses	Mills	Wine Tasting Rooms
Dumpsters	Motels	Wineries
Dwellings	Mushroom Caves	Zoos
Egg Processing Plants	Mushroom Processing Plants	
Egg Storage Facilities	Food Processing Facilities	Peanut Processing Plants
Factories	Food Quarantine	Peanut Warehouses

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	Areas	
False Ceilings	Food Service Facilities	Pet Bedding
Farm Structures	Food Storage Facilities	Pet Carriers
Feed Mills	Office Buildings	Pet Food Plants
Flour Mills	Other Public Buildings	Pet Sleeping Areas
Food Handling Establishments	Packaged Food Storage	Poultry Houses
Food Preparation Facilities	Pantries	Poultry Processing Plants

APPLICATIONS WITHIN FOOD/FEED AREAS:

Food and/or Feed areas include areas for receiving, storage (dry, cold, frozen or raw), packaging (canning, bottling, wrapping, boxing and grinding), preparing, edible waste storage and enclosed processing systems (mills, dairies, and systems for processing edible oils and syrups). Serving areas are places where prepared foods are served, such as dining rooms, but not excluding areas where food may be prepared or held. Do not apply when food or feed processing facility is in operation or foods are exposed. In the home, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment.

APPLICATIONS OF THIS PRODUCT IN FOOD/FEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS ARE NOT PERMITTED, OTHER THAN AS A CRACK AND CREVICE TREATMENT.

Using a duster, apply at the rate of 1.5 ounces of Dry PyGanic® 1.0% per 50 square feet directly into cracks and crevices, such as expansion joints between different elements of construction, under or between equipment bases and the floor, beneath appliances, into wall voids, motor housing, junction boxes or switch boxes, conduits, behind and under cabinets or drawers, in and around drains, around drain pipes, plumbing and utility entrances, hollow equipment legs and other sites where listed insects can enter or hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

Non-food/feed areas of food/feed handling establishments are areas such as garbage rooms, lavatories, floor drains (to sewers, entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

Stored Product Pests:

To aid in the control of stored product pests in listed areas. Apply Dry PyGanic® 1.0% at the rate of 16 to 24 ounces per 1000 square feet of surface area. Clean up waste materials, infested materials, dust, dirt, and any other debris. Thoroughly treat floors, walls, shelves, drawers, cabinets and other surfaces in bins, storage and handling areas, around cartons or containers and other areas where these insects tend to congregate. Apply 1 ounce per 50 square feet of surface area into cracks and crevices and other difficult to reach areas where insects may hide. This product may also be applied in voids or cracks and crevices in pantries and other infested areas within the structure. When treating for insects such as Indian Meal Moth, which tend to alight on vertical surfaces, apply a thin visible layer of Dry PyGanic® 1.0% to walls and other vertical surfaces in affected area. Repeat every 6-12 weeks or as necessary for control.

For Use in Storage Sites:

This product can be used in warehouse bins, trucks, cargo ships, mills, bin hoppers, elevators and conveying equipment and other listed sites as a clean up prior to using them for storage. All of the infested stored commodity accumulations and debris should be removed and disposed,

with special attention to material lodged in the cracks and crevices. After sanitation measures have been employed, dust all areas prior to use for storage. Apply Dry PyGanic® 1.0%, at the rate of 16 to 24 ounces per 1000 square feet of surface area. Apply dust to floors, ceilings and partition boards of bins, paying particular attention to cracks and crevices.

For packaged food warehouses, treat potential points of insect entry, as well as harborage sites in, on and around wooden and plastic pallets, pallet-racking systems, loading docks, scales, around cartons and other areas where insects hide or travel.

For Use on Stored Commodities:

For Use on Stored Products: Dry PyGanic® 1.0% may be directly applied to rice, barley, beans, birdseed, buckwheat, cocoa beans, corn, cottonseed, flax, oats, grain nuts, dried fruit, almond nutmeat and shells, walnut nutmeat and shells, pistachio, dried prunes, dried apricots, raisins, figs, wheat, oats, corn, barley, rye, sorghum, wheat, tobacco and peanuts held in storage.

For Use on Harvested Fruits and Vegetables: Dry PyGanic® 1.0% may be directly applied to apples, blackberries, blueberries, boysenberries, cherries, crabapples, currants, dewberries, figs, gooseberries, grapes, guavas, loganberries, mangoes, muskmelons, oranges, peaches, pears, peas, pineapples, plums, raspberries, tomatoes, and sweet potatoes after harvest.

Application to Stored Products and Harvested Fruits and Vegetables: Dry PyGanic® 1.0% may be applied at the rate of 8 to 24 ounces per 1000 square feet of surface area over the top of listed stored commodities or to the outside surface of stacked bags, crates or boxes. Inspect and re-apply if insects are present.

Surface Treatment of Stored Grain and Seed: To control listed stored product pests, monthly inspections should be made after the grain is placed in storage. If the top two or three inches are infested, apply 8 to 24 ounces of Dry PyGanic® 1.0% per 1,000 square feet of grain surface area. Rake the mixture into the grain to a depth of 4 inches.

For Use as a Grain Protectant: Dry PyGanic® 1.0% applied directly on grains will effectively protect the grain against grain storage insects. Apply at the rate of up to 16 ounces per 100 bushels of grain as it is carried along a belt or as it enters the auger or elevator. Monthly inspections should be made. If the top 2 or 3 inches are found to be infested, apply Dry PyGanic® 1.0% as a surface treatment following the instructions detailed above.

INDOOR TREATMENTS:

ONLY APPLY AS A SPOT TREATMENT TO AREAS NO GREATER THEN 3 FEET BY 3 FEET PER ROOM.

Crawling Insects:

Apply Dry PyGanic® 1.0%, at the rate of 1 ounce per 50 square feet of surface area, into voids, cracks and crevices or other places where insects are traveling or harboring. Apply a continuous visible film underneath and behind stairs, behind and beneath sinks, stoves, refrigerators and other appliances, around garbage cans, cabinets. Treat on around and behind moldings, shelving, baseboards, doorsills, doorframes, floors, around drains, pipes and pipe openings, plumbing, bookcases, storage, utility installations and other areas where insects hide or travel. For severe infestations apply behind cabinets and walls, in crawl spaces and attics at the rate of 16 - 20 ounces per 1000 square feet. Repeat every 8-12 weeks or as necessary for control.

Fleas, Ticks, Mites and Lice:

Treat on and around animal bedding, sleeping quarters, kennel, furniture, floor and floor coverings and all areas where these pests inhabit. Treat cracks and crevices behind around

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window and door frames, wall cracks moldings, shelving, baseboards, pipe openings and all other cracks. Treat the entire inside surface of doghouses.

Bed bugs:

Take bed apart. Apply Dry PyGanic® 1.0% into joints, channels, cracks and crevices on bed frame, headboards and footboards. Wall mounted headboards and their hardware should be removed and treated. If hollow, such as square or round tubing, see that the interior framework is well dusted. Mattresses and box springs may be dusted, especially tufts, folds and edges. All furniture and furniture accessories in the room must be treated. Pull carpeting from tack strips and treat under the baseboard, sill plate and under the carpet tack strips. Treat under, behind, and into cracks and crevices of decorative moldings. Apply a continuous visible film to other potential harborage sites such as: table and wall mounted lamps, wall crevices, electrical boxes, outlet plate covers, switch plate covers, mirrors, picture frames and backs, door jambs, moldings and hinges, window ledges, sills, drapery rods, curtains, blinds and mounting hardware, closet shelving and hardware, picture frame moldings and other crack and crevices in the room should be treated. If Bed bugs are present, treat with Bedlam Insecticide for immediate kill.

Spiders:

Remove spider webs and egg sacs both inside and outside of structure. Apply Dry PyGanic® 1.0% at the rate of 1 oz per 50 square feet to typical spider harborages and potential points of entry. Combine interior treatments with exterior perimeter application of Dry PyGanic® 1.0%.

Ants:

To aid in the control of listed ants apply Dry PyGanic® 1.0% at the rate of 1 oz per 50 square feet. Treat door frames, around window frames, behind, on and around moldings, cabinets, pipe openings, utility openings, shelves, ant trails, hills, wall voids, cracks and crevices and other points of entry into premises. Combine interior treatments with exterior perimeter application of Dry PyGanic® 1.0%.

Drywood Termites and Powder Post Beetles*:

To aid in protecting against insect entry. Apply to distribute Dry PyGanic® 1.0% through insect entry points, such as crawl holes into attics and crawl spaces of buildings, at a rate of 16 - 20 ounces per 1000 square feet. All vents and blowers on the windward side should be closed so that all target surfaces can be treated. Contact all wood surfaces. In case of localized infestations, probe to locate galleries and drill holes to inject Dry PyGanic® 1.0% into the galleries and void areas. If a heavy infestation is suspected, a conventional, industry accepted techniques and treatments should be employed.

*The purpose of such applications of Dry PyGanic® 1.0% is to kill workers or winged reproductive forms that may be present in treated channels at the time of treatment. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but are merely a supplement. This product is not recommended as sole protection against termites. For active termite infestations, use conventional, industry accepted techniques and treatments.

INDOOR AND OUTDOOR TREATMENTS

Asian Lady Beetles and Boxelder Bugs:

To control or repel these insects, as well as Clover Mites, Cluster Flies and Elmleaf Beetles, inject Dry PyGanic® 1.0% at the rate of 1 oz per 50 square feet into cracks and crevices and/or voids where these insects may be entering the premise, harboring or hibernating. Apply in crawl spaces and attics at the rate of 16 - 24 ounces per 1000 square feet. On building exterior, treat underneath wood fascia, behind siding, cracks around windows, doors, siding, wall voids, utility pipes and entry points, behind chimneys, around foundations and foundation cracks, patios and deck joints. When treating for Asian Lady Beetles apply Dry PyGanic® 1.0% in, on and around areas that they are attracted to, such as; abrupt color contrasts on buildings

(shutters, drainpipes, etc), southwest-facing or sun-exposed sides of buildings, and vertical corners of buildings.

Carpenter Ants:

Use Dry PyGanic® 1.0% to aid in the control of Carpenter Ants. Locate source of infestation or areas of activity. Treat insect tunnels, cavities and void areas. Treat points of entry into premises or exit points from voids such as around doors, windows, siding, around foundation and foundation cracks, utility entrance points, and similar areas. Apply 16 to 24 oz of Dry PyGanic® 1.0% per 1000 square feet as a perimeter treatment in a band extending 18" out from foundation, and 18" up the side of the building.

For Use on Landscape Plants, Indoors and Outdoors:

Ornamental Trees, Shrubs, Flowers and Foliage Plants : Including, but not limited to: African Violet, Ageratum, Aster, Azalea, Begonia, Calceolaria, Calendula, Calla, Camellia, Carnation, Ceanothus, Cineraria, Chrysanthemum, Coleum, Cyclamen, Cypress, Daffodil, Dahlia, Delphinium, Dogwood, Elm, Eucalyptus, Fern, Ficus, Foliage Plants, Fuchsia, Gardenia, Geranium, Gladiolus, Gloxinia, Gypsophila, Holly, Hyacinth, Hydrangea, Iris, Lily, Maidenhair Fern, Marigold, Narcissus, Palm, Pansy, Peony, Pelargonium, Petunia, Philodendron, Phlox, Pine, Pyracantha, Rhododendron, Roses, Rubber Plant, Snapdragon, Sweet Pea, Tulips, Viburnum, Wandering Jew, Yew, Zinnia and Andromeda, Arborvitae, Ash, Beech, Birch, Boxwood, Cotoneaster, Crabapple, Euonymus, Fir, Firethorn, Forsythia, Hawthorn, Hemlock, Hickory, Honey Locust, Horse Chestnut, Juniper, Larch, Laurel, Lilac, Linden, Mimosa, Myrtle, Oak, Pine, Privet, Tulip Tree, Viburnum, Willow.

IMPORTANT NOTE: Plant safety is an important consideration when using insecticides. However, it is not possible to evaluate the phytotoxicity of Dry PyGanic® 1.0% on numerous plant varieties that may react differently to insecticides in different growth stages or under varying environmental conditions. Before making widespread applications of Dry PyGanic® 1.0% treat a limited number of plants and observe for phytotoxicity over a 10 day period.

Dry PyGanic® 1.0% must come into contact with insects in order to control them. Coverage of the target insect is vital to achieving good performance. Apply Dry PyGanic® 1.0% to cover upper and lower surfaces of leaves stems and flowers with a thin, even film of dust. Apply when insects or insect damage first appears.

When treating trees, shrubs and similar plants, treat the trunk, the base of the trunk and the critical root zone. Treat the tree crotch, knotholes, wounds and other areas where insects may harbor. Allow dust to settle in treated areas before reentering. Do not water or irrigate immediately following treatment.

OUTDOOR AREAS for use in and around areas such as, but not limited to:

Ant Mounds	Arboretums	Back Yards
Balconies	Beneath Decks	Beneath Gazebos
Calf Hutches	Compost Sites	Courtyards
Decks	Dog Runs	Drive-In Restaurants
Drive-In Theaters	Dumpsters	Farmers Markets
Flea Markets	Front Yards	Gardens
Gazebos	Home Gardens	Kennels
Lanais	Landscapes	Lath Houses
Loading Docks	Lumber Storage Areas	Nurseries
Outdoor Eating Facilities	Patios	Porches
Sanitary Sewers (Manholes)	Side Yards	Swine Yards

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Building Perimeter Treatments:

To aid in preventing entry and infestations of buildings by listed insects, Apply 16 to 24 oz of Dry PyGanic® 1.0% per 1000 square feet to building exterior as a perimeter treatment in a band extending 12 - 18" along and adjacent to foundation, and to a height of 2 to 3 feet up the side of the building where these pests are active and may find entrance.

To Kill Insects Harboring in Lawns, Landscaping, and Backyards:

To aid in the control of listed insects, apply Dry PyGanic® 1.0% at the rate of 8 to 24 ounces per 1,000 square feet. For best results, lawn should be mowed one to two (1 - 2) days before applying, and clippings removed. Be sure to cover the entire lawn surface where insects are present, or normally frequent. Apply under ornamental plants, shrubs and trees. Do not water or irrigate immediately following application. Repeat treatments may be necessary at 7 to 14 day intervals. Keep pets and children out of the treated area until after the dust has settled.

LIVESTOCK, DAIRY, SWINE, POULTRY AND OTHER ANIMAL BUILDINGS AND PREMISES:

WHEN USED ON DAIRY BARN OR FACILITIES: CLOSE MILK BULK TANK LIDS TO PREVENT CONTAMINATION FROM DUST AND FROM DEAD OR FALLING INSECTS. REMOVE OR COVER MILKING UTENSILS BEFORE APPLICATION. WASH TEATS OF ANIMALS BEFORE MILKING.

To aid in the control of listed insects in listed indoor and outdoor animal areas, apply Dry PyGanic® 1.0% at the rate of 1 oz per 50 square feet to cracks, crevices, voids, structural joints, floors, walls, wall joints, support beams, trusses, rafters, ceilings, around scales, chutes, gates, and other areas where insects harbor, alight, hide or travel. For larger area treatments use 16 to 24 oz of Dry PyGanic® 1.0% per 1000 square feet. Avoid contamination of feed, feedstuffs or milking equipment.

Apply 16 to 24 oz of Dry PyGanic® 1.0% per 1000 square feet to exterior of livestock buildings in an 18" band along and adjacent to building foundations, and to a height of 2 to 3 feet up the side of the building where insects are active and may find entrance.

ON-ANIMAL USE:

APPLICATIONS WITH POWER DUSTER EQUIPMENT ARE PROHIBITED.

Beef, Dairy Cattle, Horses and Other Livestock:

Can be used in dust bags, shaker can and mechanical dust applicator to aid in the control or repellency of listed livestock insects.

Direct Application: Apply 2 oz. of dust per animal by shaker can, or suitable mechanical dust applicator over the head, neck, shoulders, back and legs.

Application through Dust Bags: Place contents of this package in any commercially available dust bag, suspend bag in areas frequented by cattle or in gateways or lanes through which the animals must pass daily for water, feed or minerals. Bags may also be placed in loafing sheds or in front of mineral feeders. For dairy cows, bags may be suspended in the exit through which the cows leave the milking barn. The bags should hang 4 to 6 inches below the back line of the cattle. For reduction of *Face Flies*, bags must be located so animals will be forced to use them daily and hung at a height so that the face is dusted.

Swine:

Direct Application: Apply only 1 ounce per head as a uniform coat to the head, shoulder and back by use of a shaker can or suitable mechanical dust applicator. Do not apply more often than once every 10 days. In severe infestation, both animals and the bedding may be treated. Do not ship animals for slaughter within 5 days of treatment.

Poultry:

To control listed livestock insects, apply at a rate of 1 lb. per 100 birds. Ensure thorough treatment of vent area.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry place. Keep container tightly closed.

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: Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other approved State or Local procedures.