



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

MAY 14 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Thomas A. Lennan
McLaughlin Gormley King Company
8810 Tenth Avenue North
Minneapolis, MN 55427

Dear Mr. Lennan:

Subject: Label Amendment
MGK 2925 (C)
EPA Registration Number: 1021-1874
Application Dated: December 22, 2008
Decision: 404344

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 comment listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

Entomologist's Conclusion:

The Agency has reviewed the data you submitted for the claim against bedbugs and has concluded that the data for kill claims are acceptable and bedbugs may be added to your product label.

Label Revisions:

Per the May 6, 2009, label review summary for efficacy claims, and the cited product, only the following claims are allowed on the product label. All other claims must be deleted:

- Convenient-easy to use
- Delayed fogging allows time to leave room

- No oily residue on surfaces
- No stains
- Kills listed crawling and flying insects, including bed bugs
- Kills even the toughest bugs like bed bugs and cockroaches
- Deep reaching [penetrating] dry smoke/vapor
- Fumigating fog penetrates [hard to reach] areas where insects [bed bugs] [roaches, adult fleas, ticks, mosquitoes, flies, ants, spiders, and bed bugs] live and hide
- Fumigating fog penetrates [reaches] seams of bed frames, bedding, mattresses, box springs, linens, pillows, and behind headboards, bed frames, under and beneath furniture to contact [kill] exposed stages of bed bugs
- Dry smoke/vapor penetrates obstructed spaces such as upholstered furniture, drawers, bureaus, dresser drawers, kitchen cabinets.
- Dry for kills exposed stages of roaches (including palmetto bugs and water bugs), adult fleas, ticks, mosquitoes, flies, and ants, spiders, bed bugs, [listed bugs]
- Dense fog makes kill listed insects [bed bugs] quick and easy
- Relieves infestations fast
- Part of a complete home defense system
- [Dry smoke/vapor] kills exposed stages of bugs where they hide
- Concentrated killer
- Effective bed bug control
- German roaches may take longer to kill than other bugs
- It is the first step for control of home pest problems such as bed bugs, roaches (palmetto bugs and water bugs), adult fleas, ticks, mosquitoes, flies, ants, and spiders
- With this new [simple to use] technology, you see the results [and not the (spray) residue]
- When you return what you might expect to see:
Hidden and Exposed Bed bugs Dead
Hidden and Exposed Roaches and Nymphs Dead*
Adult fleas, Ticks, Mosquitoes, Flies, Ants, and Spiders Dead*
*Exposed pests will exhibit suppressed emergence

- One unit treats a room of 3,000 or less (18'x20'x8') cubic feet [375 square feet]
- Kills: Bed bugs, Roaches (Palmetto bugs and Water bugs), adult fleas, ticks, mosquitoes, flies, ants, and spiders
- German cockroaches: This product takes longer to kill these roaches than other bugs

Also strike all references to use in campers, RV's and boats from your product labeling, as these are not use sites on the cited product label.

If you have any questions, please contact Melody Banks on (703) 305-5413.

Sincerely,



Kimberly Nesci
Product Manager 11
Insecticide Branch
Registration Division 7507P

Enclosure: Copy of Entomologist Review
Copy of Stamped Approved Label "with" Comments

MGK®

McLAUGHLIN
GORMLEY
KING COMPANY

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

[] Indicates alternate or optional wording.

One unit treats a room of 3,000 cubic feet (18' x 20' x 8') [375 square feet.]

Kills: Bed bugs, Roaches (Palmetto bugs and Water bugs), adult fleas, ticks, mosquitoes, flies, ants and spiders.

- For household use [For use in homes, apartments, campers, RVs, and boats]
- For use in kitchens, living areas, bedrooms, garages, attics, basements, and pet living areas.
- Convenient-easy to use.
- Delayed fogging allows time to leave room.
- No oily residue on surfaces.
- No stains.
- Emits a water-free, dry smoke vapor.
- No need to turn off ignition sources such as pilot lights
- Solvent free
- Contains No Solvents
- Kills Listed Insects
- Kills Listed Crawling and Flying Insects, including bedbugs.
- Kills bed bug nymphs and adults [for peace of mind]
- Kills even the toughest bugs like bed bugs and cockroaches
- No nozzles to point or tabs to push
- Easy to use from start to finish
- Can re-enter treated areas sooner than some foggers
- Flushes Bugs Out From Where they Hide and Kills them on Contact
- Deep Reaching [Penetrating] dry smoke/vapor
- Dry smoke/vapor disperses uniformly throughout a wide space.
- Fumigating fog penetrates [hard to reach] areas where insects [bed bugs] [roaches, adult fleas, ticks, mosquitoes, flies, ants, spiders, and bed bugs] live and hide.
- Fumigating fog penetrates [reaches] seams of bed frames, bedding, mattresses, box springs, linens, pillows, and

- behind bed headboards, bed frames, under and beneath furniture to contact [kill][eliminate] bedbugs.
- Dry smoke/vapor penetrates obstructed spaces such as upholstered furniture, drawers, bureaus, dresser drawers, kitchen cabinets.
- Dry Fog Kills Roaches (including Palmetto bugs and Water bugs), adult fleas, ticks, mosquitoes, flies, ants, spiders, bed bugs, [listed bugs] where they hide.
- Dense fog makes kill of listed insects [bed bugs] quick and easy.
- Just add water. Just add water to create a fumigating fog that kills listed insects [bed bugs]
- Creates a fumigating fog.
- Relieves infestations fast
- Part of a complete home defense system
- [Dry smoke/vapor/fog] leaves no wet mess or residue.
- [Dry smoke /vapor] requires no clean-up.
- [Dry smoke/vapor] kills bugs where they hide.
- Concentrated Killer
- Kills even the toughest bugs
- Less preparation required vs. foggers.
- Easier to use than foggers.
- Can re-enter treated area 1 hour (25%) sooner vs. foggers.
- Delayed activation (allows you to leave the room)
- Does not stain. Will not stain or discolor [fabric] [bedding][fine furniture]Guaranteed to work or your money back.
- Unscented. No scent added.
- Effective bed bug control.

ACTIVE INGREDIENTS:

* (RS)-alpha-cyano-3-phenoxybenzyl (1RS)-cis/trans-chrysanthemate.....	7.20%
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OTHER INGREDIENTS.....	92.80%
	100.00%

*1 R isomer ratio: ≥ 95% 1R

MGK® - Registered trademark of McLaughlin Gormley King Company

Flammable

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY 14 2009

Net Contents _____

Manufactured by:

Mc LAUGHLIN GORMLEY KING COMPANY

8810 Tenth Avenue North

Minneapolis, MN 55427

EPA Reg. No. 1021-1874

EPA Est. No. 1021-MN-2

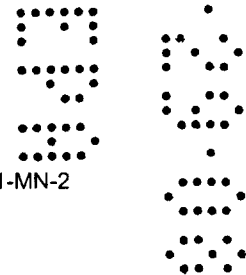
KEEP OUT OF REACH OF CHILDREN

CAUTION

See side/back panel for additional Precautionary Statements and First Aid.

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

1021-1874



FIRST AID

IF INHALED:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center or doctor for treatment advice.
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.
IF SWALLOWED:	<ul style="list-style-type: none"> Immediately call a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or a doctor. Do not give anything by mouth to an unconscious person.
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.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if inhaled. Avoid breathing the smoke. Avoid contact with eyes. May cause sensitization following repeated contact with the skin of susceptible individuals. Cover and turn off fish aquariums. Remove plants, pets, and birds before using. Wash hands with soap and water after handling.

Do not use in food areas of food handling establishments, restaurants, etc.

PHYSICAL OR CHEMICAL HAZARDS

When metal cartridge comes in contact with water, and for 30 minutes thereafter, it will be hot. This is normal. In order to prevent skin burns, do NOT touch metal container during this time. Heat resistant cup protects contact surfaces.

MGK® F-2925(C) is a deep-penetrating fumigating fogger that flushes bugs out from where they hide and kills them on contact. The smoke stays in the air during the 3-hour treatment, penetrating deep, filling cracks and crevices [including bed frames, behind bed headboards, seams of mattresses, box springs, pillows and other bedding, and going way(moves) under furniture and appliances to kill bed bugs, roaches and fleas where they hide. The penetrating fog will also move behind bed headboards, drawers around furniture, and other hidden areas where bed bugs are known to hide. That is why it kills so many bugs!

German roaches may take longer to kill than other bugs.

It is the first step for complete control of home pest problems such as Bed Bugs, Roaches (Palmetto bugs and Water bugs), adult fleas, ticks, mosquitoes, flies, ants and spiders.

With this new [simple to use] technology, you see the results [and not the (spray) residue].

When activated, it fumigates the whole room with a [deep penetrating] white cloud of smoke.

When you return what you might expect to see:

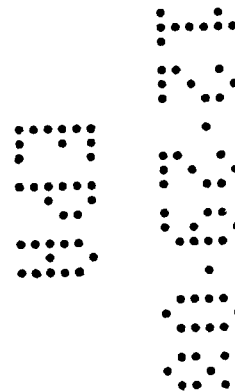
- Hidden and Exposed Bed bugs Dead*
- Hidden and Exposed Roaches and Nymphs Dead*
- Adult fleas, Ticks, Mosquitoes, Flies, Ants and Spiders Dead*

*Exposed pests will exhibit suppressed emergence.

For a free product demonstration : visit [product website]

One unit treats a room of 3,000 (18' x 20' x 8')cubic feet[375 square feet.]. For best results keep treated room closed for 3 hours.

Kills: Bed bugs, Roaches (Palmetto bugs and Water bugs), adult fleas, ticks, mosquitoes, flies, ants and spiders.



For Guaranteed Results: Carefully Read and Follow Instructions.

For household use (or for use in homes, apartments, campers, RVs, and boats): For use in Kitchens, living areas, garages, attics, basements, and pet living areas. Relieves infestations.

- Convenient-easy to use.
- Delayed fogging allows time to leave room.
- No oily residue on surfaces.
- No stains.

DIRECTIONS FOR USE

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

Do not use in commercial food /feed handling establishments, restaurants, or other areas/sites where food/feed is commercially prepared, processed, served or stored. In the home all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use following treatment. Exposed food should be covered or removed.

1. Room Preparation: Open cupboards, cabinets, and drawers. Remove or cover all exposed food, dishes, and utensils. Remove plants, pets, and birds. Cover and turn off fish aquariums. Close windows and doors. Shut off fans, air conditioners, and temporarily disconnect smoke alarms.
2. Treatment: DO NOT OPEN UNTIL READY TO USE. TAKE OFF THE PLASTIC LID OF THE CONTAINER. The paper lid can be thrown away. Take the fumigator out of the plastic cup and tear off the aluminum packaging.
3. Fill plastic cup with water to fill line, Place canister with arrows pointing up into cup with water. DO NOT OVER FILL. DO NOT INSERT UPSIDE DOWN.
4. Place it on the floor in the center of the room. The water will slowly activate the fumigator allowing time for you to leave the room.
5. Fumigation starts within 1-2 minutes. Leave the room and keep doors and windows closed for 3 hours.
6. After Treatment: Before re-occupying area, open all doors and windows, and air for 30 minutes. Reactivate smoke alarms.

German cockroaches: This product takes longer to kill these roaches than other bugs.

STORAGE AND DISPOSAL

STORAGE: Store unused units in their original containers in dry area inaccessible to children.

DISPOSAL:

If empty: Nonrefillable container. Do not reuse or refill this container.

Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

