



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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Mr. Steven K. Ditto
Regulatory Affairs Specialist
McLaughlin Gormley King Company
8810 Tenth Avenue
Minneapolis, MN 55427-4319

NOV 15 2011

Subject: Label Amendment
Addition of Marketing Claims
MGK 29461
EPA Reg. No. 1021-2559
Submission dated August 29, 2011

Dear Mr. Ditto,

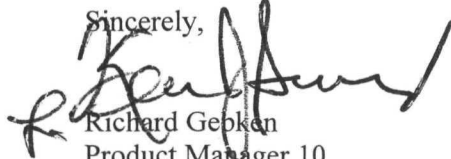
The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided you:

1. Remove the following marketing claims:
 - [New] [Exclusive] formula!
 - [With] GermKiller
 - [With] GermBuster
 - The one-two punch for household pests
 - Kills bugs, fights germs
 - Stops bugs and germs in their tracks
 - The easy way to protect your home from bugs and germs
 - Lethal to bugs and germs

The previously approved claims were specific and referred to killing the germs spread by insects or household insects only.
2. Remove the terms "GermKiller" and "GermBuster". No description is provided of the formulation components that these terms refer to.
3. Remove "[roaches]" from the claim: "Kills 99.9% of Household Germs that [roaches] [household insects [bugs] may leave behind". No references to cockroach specific studies that tested or provided data to support this claim were provided.

A stamped copy of the label is enclosed for your records. If you have any questions, please call Kevin Sweeney at (703) 305-5063.

Sincerely,



Richard Gebken
Product Manager 10
Insecticides Branch
Registration Division (7505P)

Enclosure

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MGK®

McLAUGHLIN
GORMLEY
KING COMPANY

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

[New] Dual Action
 [New] 2 [jobs] in 1 [Application] [Spray]
 Loaded with [Enhanced with] GermEnder™
 GermEnder™ Power
 [With] GermKiller™
 [With] GermBuster™
 [GermEnder™] Kills and [Sanitizes][in one application] [at once] [at the same time] [in one easy step] [in one shot]
 Help[s] protect your family from the spread of germs* bugs [insects] [household insects] [roaches] may leave behind
 Water based
 For indoor household use only
 [Fragrance Free]
 Evergreen Fresh [Fragrance]
 Fresh Pine [Fragrance]
 Spring Fresh [Fragrance]
 No lingering chemical odor
 Kills [listed insects] by contact!
 Kills Ants [Kills Fire Ants (including Red Imported Fire Ants, Southern Fire Ants, California Fire Ants, Tropical Fire Ants), Carpenter Ants, Argentine Ants, Pavement Ants, Larger Yellow Ants, Little Black Ants, Cornfield Ants, Odorous House Ants, Crazy Ants, Raspberry Crazy Ants, Ghost Ants, White Footed Ants, Acrobat Ants, Field Ants, Velvety Tree Ants, Pharaoh Ants, Red Harvester Ants], Cockroaches [Roaches] (German Cockroaches), Palmetto Bugs, Spiders (including Black Widow Spiders, Daddy-Long-Legs Spiders, Marbled Cellar Spiders, Giant Wolf Spiders, Burrowing Wolf Spiders, Banded Garden Spiders, Catface Spiders, Cupboard Spiders, Cobweb Weaver Spiders, Bud Spiders, European House Spiders, Common House Spiders, Southern House Spiders, Yellow Sac Spiders, Funnel Web Spiders, Grass Spiders, Ground Spiders, Parson Spiders, Bold Jumping Spiders, Woodlouse Spiders), Asian Lady Bird Beetles, Brown Dog Ticks, Carpet Beetles, Crickets, Fleas, Scorpions, Silverfish, Sowbugs (Pillbugs), Stinkbugs, and Waterbugs.
 Keeps killing German roaches for up to 40 weeks [10 months] on non-porous surfaces
 Kills 20 Home Invading Ant Species [and] [20 Home Invading Spider Species]
 [New] [Exclusive] formula!
 Guaranteed to work [or your money back]
 Won't stain or discolor

Reduces [Kills] [Sanitizes] [Eliminates] 99.9% of household germs* that [roaches] [household insects] [bugs] [insects] may leave behind
 Kills [listed] [household] [insects**] bugs** and 99.9% of germs* [they may leave behind.]
 Kills 99.9% of Household Germs* that [roaches] [household insects**] [bugs**] may leave behind
 America's 1st name in pest control [since 1833]
 [Optional Marketing Graphics] – Place intended graphics here – (Pine sprig, Flowers)
 Kills German roaches for 40 weeks [10 Months] on non-porous surfaces
 Long lasting control of German roaches for up to 10 months [40 weeks] on non-porous surfaces
 Kills & sanitizes in one treatment
 Bug** & Germ* killing power in one spray
 Kills bugs** & [99.9% of] germs* in one step
 One-Step solution to bugs** and their germs*
 The quick, easy way to kill bugs** & the germs* they leave behind
 Kills more than 40 different bugs** & 99.9% of the germs* they may leave behind
 The one spray solution to bugs** & the germs* they may leave behind
 More than 40 different bugs** 99.9% of their germs*, up to 10 months of protection against German roaches on non-porous surfaces
 Kills and sanitizes at the same time
 Kills bugs**, fight germs*
 Dual action formula!
 Indoor pest protection
 The convenient way to kill bugs** and germs*
 Double action killer
 The one-two punch for household pests**
 Kills household pests** and the germs* they spread
 Stops bugs** and germs* in their tracks
 Kills household pests** and the germs* they spread
 A powerful one-two combination knocks out pests** and the germs* they spread
 The easy way to help protect your home from bugs** and germs*
 Lethal to bugs** and germs*
 Up to 40 weeks [10 months] of continuous killing power against German roaches on non-porous surfaces

ACTIVE INGREDIENTS:

Cypermethrin-----	0.030%
Pyrethrins-----	0.011%
ETOC (Prallethrin)-----	0.011%
Alkyl dimethyl benzyl ammonium chloride(C ₁₂₋₁₆)-----	0.008%
Octyl decyl dimethyl ammonium chloride-----	0.006%
Diocetyl dimethyl ammonium chloride-----	0.003%
Didecyl dimethyl ammonium chloride-----	0.003%
OTHER INGREDIENTS-----	99.928%
	100.000%

**ACCEPTED
with COMMENTS
In EPA Letter Dated
NOV 15 2011**
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
1021-2559

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

*Staphylococcus aureus (Staph) and Klebsiella pneumoniae on hard, non-porous, non-food contact surfaces [99.9% that household insects may leave behind].

** [as listed on label][see label for list of [listed] insects [bugs]]

FIRST AID	
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.
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 Weight _____

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

EPA Reg. No. 1021-2559

EPA Est. No. 1021-MN-2

Contains no CFCs or other
ozone depleting substances



Federal regulations prohibit
CFC propellants in aerosols

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

CAUTION

Causes moderate eye irritation. Avoid contact with, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet

ENVIRONMENTAL HAZARDS

Do not apply directly to water.

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.

MGK® 29461 [Product Name] [with] [GermEnder™] [GermKiller™] [GermBuster™] kills insects by contact, keeps killing roaches for up to 10 months, and reduces [kills] 99.9% of the household germs* that [roaches] [household insects] may leave behind. (No residual sanitizer action. Not for primary use as a sanitizer).

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

SHAKE WELL BEFORE USE

For Indoor [Household] use:

Kill Ants (Fire Ants (including Red Imported Fire Ants, Southern Fire Ants, California Fire Ants, Tropical Fire Ants), Carpenter Ants, Argentine Ants, Pavement Ants, Larger Yellow Ants, Little Black Ants, Cornfield Ants, Odorous House Ants, Crazy Ants, Raspberry Crazy Ants, Ghost Ants, White Footed Ants, Acrobat Ants, Field Ants, Velvety Tree Ants, Pharaoh Ants, Red Harvester Ants), Cockroaches[Roaches] (German Cockroaches), Palmetto Bugs, Spiders (including Black Widow Spiders, Daddy-Long-Legs Spiders, Marbled Cellar Spiders, Giant Wolf Spiders, Burrowing Wolf Spiders, Banded Garden Spiders, Catface Spiders, Cupboard Spiders, Cobweb Weaver Spiders, Bud Spiders, European House Spiders, Common House Spiders, Southern House Spiders, Yellow Sac Spiders, Funnel Web Spiders, Grass Spiders, Ground Spiders, Parson Spiders, Bold Jumping Spiders, Woodlouse Spiders), Asian Lady Bird Beetles, Brown Dog Ticks, Carpet Beetles, Crickets, Fleas, Scorpions, Silverfish, Sowbugs (Pillbugs), Stinkbugs, and Waterbugs.

For best effect, spray directly on insect.

For residual control of German cockroaches spray non-porous surfaces along baseboards, under sinks, refrigerator, stove, dishwasher, or other places where cockroaches may hide.

For Sanitizing: To sanitize pre-cleaned non-porous, non-food surfaces [such as glass, vinyl, glazed stone, glazed ceramic, stainless steel, chrome and other non-porous surfaces], [along baseboards, under sinks, refrigerator, stove, dishwasher, kitchens, bathrooms or other places where listed insects may frequent], hold spray a maximum of 12" from surface being sprayed. Spray surface until thoroughly wet. Let stand for 5 minutes and allow to dry.

Do not use as a space spray. Do not apply this product in a way that will contact adults, children or pets, either directly or through drift.

Remove pets, birds, and cover fish aquariums before spraying. Remove and 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 enter treated areas or allow others, including children and pets to enter until sprays have dried.

STORAGE AND DISPOSAL

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

Pesticide Storage

Store in a cool, dry area. Always store pesticides in the original container. Store away from food and pet food.

Pesticide Disposal and Container Handling

Do Not Puncture or Incinerate!

Nonrefillable container. Do not reuse or refill this container.

If empty:

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.