



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 23, 2015

Steven K. Ditto
McLaughlin Gormley King Company
8810 10th Avenue N.
Golden Valley, MN 55427

Subject: Label Notification per PRN 98-10 – Adding optional dilution instructions and
“Patented Technology” claim
Product Name: VBC₃ Insecticide
EPA Registration Number: 1021-2776
Application Date: December 30, 2014
Decision Number: 499091

Dear Mr. Ditto:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

If you have any questions, you may contact Julie Chao at (703) 308-8735 or via email at chao.julie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis".

Kable Bo Davis, Product Manager 03
Invertebrate-Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

VBC₃ Insecticide

Alternate Names:

Crossfire™

Crossfire™ Insecticide Bed Bug Concentrate

CROSSFIRE™ Bed Bug Concentrate

[] Indicates optional wording.

- *[Kills Bed Bugs and Bed Bug Eggs*
- *Scientifically formulated to kill Pyrethroid-resistant and or Field and or Wild Bed Bug Strains*
- *Kills all bed bug life stages or entire bed bug lifecycle by Contact*
- *Kills and or Controls and or Targets Adult and Nymphs Bed Bug Life Stages*
- *Kills and or Targets all Bed Bug Life Stages: Adults, Nymphs and Eggs*
- *Kills Bed Bugs on surfaces for up to 4 weeks*
- *Reduces and or Prevents pyrethroid-resistant and susceptible Bed Bug egg hatch*
- *Residual Control and or Kill for up to 4 weeks or 30 days or 1 month begins working within minutes of exposure or application*
- *Effective for up to 30 days Post or After Application*
- *Direct contact provides control in only 5 minutes as shown in or by independent testing*
- *Fast or Quick Knockdown and Kill*
- *~~Patent Pending~~Patented Technology*
- *Recommended for use by Pest Control Operators or Pest Management Professionals or Commercial Applicators*
- *For use in Residential, Institutional and Commercial Facilities*
- *Approved for direct application on or onto mattresses*
- *Use as part of your existing bed bug control program*
- *Non-staining*
- *No visible residue*
- *Low odor*
- *Non-Repellent*
- *Easy to measure and mix*
- *Unique water-based formula*
- *Unique blend of active ingredients to control and or kill resistant bed bugs]*

ACTIVE INGREDIENTS:

Clothianidin 4.00%

Metofluthrin 0.10%

Piperonyl Butoxide* 10.00%

OTHER INGREDIENTS: 85.90%

100.00%

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

Contains 0.3409 lb. of Clothianidin, 0.0085 lb. of metofluthrin and 0.8523 lb. of piperonyl butoxide per gallon of concentrate.

NOTIFICATION

1021-2776

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

1/23/2015

[Crossfire is a trademark of Sumitomo Chemical Co., Ltd.]

KEEP OUT OF REACH OF CHILDREN

See attached booklet [inside label] [back panel] for additional precautionary statements [and directions for use].

PRECAUCION AL CONSUMIDOR: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

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

Manufactured by:



8810 Tenth Avenue North
Minneapolis, MN 55427

EPA Reg. No. 1021-2776

EPA Est. No. 1021-MN-2

Net Contents: 130 fl. Ounces [13 fl. Ounces]

Patent 8,889,721 [Pat. 8,889,721]

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt
- Long pants, and
- Shoes and socks

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 materials that have been drenched or heavily contaminated with the product's concentrate. Don't reuse them.

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product in, on or around 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.

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

SHAKE WELL BEFORE EACH USE

FOR INDOOR USE ONLY

VBC₃ [PRODUCT NAME] is the next generation insecticide which effectively kills Bed Bugs in both residential and commercial buildings and structures. **VBC₃'s [Product name]** ~~patent pending~~**patented** technology provides residual control for up to four weeks after application and is scientifically formulated to target [pyrethroid, wild and or field] **resistant** as well as susceptible **Bed Bug strains**. **VBC₃ [PRODUCT NAME]** also kills **Bed Bug Nymphs and Eggs** by contact. This product must be diluted with water and applied according to the mixing instructions [directions] below. Apply **VBC₃ [PRODUCT NAME]** as an indoor crack and crevice, or direct spray application [according to application instructions] in non-food areas including but not limited to: hotels, shelters, modes of transportation, restaurants, schools, nursing homes, warehouses, offices, apartments, motels, kennels, and hospitals. **VBC₃ [PRODUCT NAME]** is an easy to use water-dilutable concentrate for application with hand-held, backpack or with a paintbrush. This product will not stain water-safe fabrics or surfaces, however care should be taken to test an inconspicuous area for staining prior to use.

TO KILL BED BUGS (Adults, Nymphs and Eggs): For best results, vacuuming surfaces is recommended prior to treatment. Spray bed bugs and eggs directly wherever possible. Apply as a pinstream, coarse spray or low pressure spray for crack and crevice, carpet perimeter, and direct spray applications in and around non-food areas where bed bugs and their eggs may hide or harbor. For example, on and around baseboards, floorboards, millwork, bed frames, headboards, wall hangings, furniture, door and window frames, walls, closets, window treatments, beneath floor coverings, as well as other non-washable items that may come in contact with bed bugs such as luggage, shoes and backpacks. If treating a pet's living environment, spray on and around pet beds, bedding, floors, sleeping areas and furnishings. This product can also be applied with a paintbrush to walls, baseboards, floorboards, behind wall hangings and other similar areas.

MATTRESS APPLICATION: **VBC₃ [PRODUCT NAME]** can be directly applied to mattress and box springs surfaces. For porous surfaces such as mattresses and carpet perimeter areas, apply until thoroughly damp but not wet. Infested bed linens should not be treated. These should be removed, tightly sealed in a plastic bag, laundered and dried at high temperatures prior to re-use. Vacuuming surfaces prior to treatment is highly recommended. Using pinstream, coarse or low pressure equipment, spray directly to mattress surface paying special attention to seams, folds, tufts and edges as well as bed frames and box springs where bed bugs harbor. Re-make bed with clean linens prior to reuse.

USE RESTRICTIONS

- THIS PRODUCT IS NOT FOR USE ON HUMANS OR ANIMALS
- Do not spray product directly on pets.
- Not for broadcast use.
- Do not use in commercial food/feed processing, preparation, food/feed storage or serving areas.
- In the home, all food/feed processing surfaces and utensils should be covered during treatment, or thoroughly washed before use. Cover or remove exposed food/feed.
- Remove pets, birds and cover fish aquariums before spraying.
- This product will not stain water-safe fabrics and surfaces, however care should be taken to test an inconspicuous area for staining prior to use.
- DO NOT allow adults, children or pets to enter treated area until sprays are dry
- DO NOT apply to plants or crops
- DO NOT treat areas when occupants are present
- DO NOT apply as a space spray
- DO NOT wet articles to the point of runoff or drip
- DO NOT use treated articles until spray has dried

[NOTE TO REVIEWER: THE FOLLOWING ARE MIXING INSTRUCTIONS FOR WHEN THE PRODUCT IS PACKAGED IN A 130 FL. OZ. CONTAINER:]

[MIXING INSTRUCTIONS]

[VBC₃ [PRODUCT NAME] is packaged in a 130 fl. oz. container to produce exactly 10 finished gallons (10 doses/treatments). Pour 13 fl. oz. of the 130 fl. oz. container into 115 ounces of water to produce exactly 1 finished gallon to treat 1,000 sq. ft.]

<u>Dilution in water</u> <u>Active ingredients</u>	<u>13 fl. oz. per Gallon</u> <u>Final percent concentration</u> <u>of active ingredients</u>
<u>Clothianidin</u>	<u>0.40%</u>
<u>Metofluthrin</u>	<u>0.01%</u>
<u>Piperonyl Butoxide</u>	<u>1%</u>
<u>Total percent concentration of actives</u>	<u>1.42%</u>

<u>Pests</u>	<u>Dilution in water</u>	<u>Application Rate of Mixed Solution</u>	<u>Application Method(s)</u>
<u>Bed Bugs</u>	<u>13 fl. oz./Finished Gallon</u>	<u>1 Gallon/1000 sq. ft.</u>	<u>Apply as a coarse wet spray</u> <u>• <u>Spot Treatment</u>]</u>

[NOTE TO REVIEWER: THE FOLLOWING ARE MIXING INSTRUCTIONS FOR WHEN THE PRODUCT IS PACKAGED IN A 13 FL. OZ. CONTAINER:]

[MIXING INSTRUCTIONS]

[VBC₃ [PRODUCT NAME] is conveniently packaged in a single dose 13 fl. oz. container. Pour the entire contents of the 13 fl. oz. container into 115 oz. of water to produce exactly 1 finished gallon to treat 1000 sq. ft.]

<u>Dilution in water</u> <u>Active ingredients</u>	<u>13 fl. oz. per Gallon</u> <u>Final percent concentration</u> <u>of active ingredients</u>
<u>Clothianidin</u>	<u>0.40%</u>
<u>Metofluthrin</u>	<u>0.01%</u>
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MIXING INSTRUCTIONS

VBC₃ [PRODUCT NAME] is conveniently packaged in a single unit dose so there is no measuring required. Mix entire contents [13 fl. oz.] in 1 gallon of water to treat 1000 square feet.

To prepare the diluted spray, fill the sprayer tank with half the total water to be used, add the VBC₃ [PRODUCT NAME] then add the remaining water to the spray tank to achieve the final application volume. Close the spray tank and shake thoroughly to insure proper suspension. For optimal results, solution should be used within 24 hours of being prepared. Spray tank solution should be shaken prior to each use or if application is interrupted. Diluted mixture may be stored overnight.

NOTICE: This product may be tank-mixed with other insecticides. Application must conform to the use directions and precautions of both products. Prior to tank mixing, a small jar compatibility test should be conducted using the proper proportions of each product and water to ensure the physical compatibility of the mixture. Tank mix applications must be made in accordance with the more restrictive of label limitations and precautions. No label application rates may be exceeded. This product cannot be mixed with any product with label prohibitions against such mixing.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store product in its original container. Store in a cool, dry place and avoid excess heat. Keep container tightly closed when not in use. Keep product from freezing. Diluted mixture may be stored overnight.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. In case of spill or leak on floor or paved surfaces absorb with sawdust or other commercially available absorbing material, sweep up and remove to chemical waste area until proper disposal can be made.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat the procedure two more times, then offer for recycling, if available or puncture and dispose of in a sanitary landfill or by other approved State or Local procedures.

DISCLAIMER, RISKS OF USING THIS PRODUCT, LIMITED WARRANTY AND LIMITATION OF LIABILITY

IMPORTANT: Read the entire Label including this Disclaimer, Risks of Using this Product, Limited Warranty, and Limitation of Liability before using this product. If the terms are not acceptable THEN DO NOT USE THE PRODUCT.

RISKS OF USING THIS PRODUCT The Buyer and User (referred to collectively herein as "Buyer") of this product should be aware that there are inherent unintended risks associated with the use of this product which are impossible to eliminate. These risks include, but are not limited to lack of control of the target pests, resistance of the target pest to this product, injury caused by drift. Such risks of non-performance, resistance or other unintended consequences are unavoidable and may result because of such factors as presence of other materials either applied in the tank mix with this product or prior to application of this product, cultural practices or the manner of use or application, (or a combination of such factors) all of which are factors beyond the control of MGK. The Buyer should be aware that these inherent unintended risks may impact the effectiveness of this product. If the Buyer chooses not to accept these risks, THEN THIS PRODUCT SHOULD NOT BE APPLIED. By applying this product Buyer acknowledges and accepts these inherent unintended risks AND TO THE FULLEST EXTENT ALLOWED BY LAW, AGREES THAT ALL SUCH RISKS ASSOCIATED WITH THE APPLICATION AND USE ARE ASSUMED BY THE BUYER. MGK shall not be responsible for losses or damages (including, but not limited to incidental, consequential or special damages that may be claimed) resulting from use of this product in any manner not set forth on the label. Buyer assumes all risks associated with the use of this product in any manner or under conditions not specifically directed or approved on the label.

LIMITED WARRANTY warrants only that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the label, under average use conditions, when used strictly in accordance with the label and subject to the Risks of Using This Product as described above. To the extent consistent with applicable law AND AS SET FORTH ABOVE, MGK MAKES NO OTHER WARRANTIES, EITHER EXPRESSED OR IMPLIED. No agent or representative of MGK or Seller is authorized to make or create any other express or implied warranty.

LIMITATION OF LIABILITY To the fullest extent allowed by law, MGK or Seller is not liable for any incidental, consequential, indirect or special damages resulting from the use or handling of this product. The limitation includes, but is not limited to increased finance charges or altered finance ratings, emotional or mental distress and/or exemplary damages. TO THE FULLEST EXTENT ALLOWED BY LAW, THE EXCLUSIVE REMEDY OF THE BUYER, AND THE EXCLUSIVE MAXIMUM LIABILITY OF MGK OR SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THIS PRODUCT OR, AT THE ELECTION OF MGK OR SELLER, THE REPLACEMENT OF THE PRODUCT.

PROMPT NOTICE OF CLAIM To the extent consistent with applicable law allowing such requirements MGK must be provided Product Name/Label Number/Page # notice as soon as Buyer has reason to believe it may have a claim, but in no event later than twenty-one days from date of application, so that an immediate inspection of the affected property can be made. To the extent consistent with applicable law if Buyer does not notify MGK of any claims, in such period, it shall be barred from obtaining any remedy.

NO AMENDMENTS MGK and Seller offer this product, and Buyer accepts it, subject to the foregoing Disclaimer, Risks of Using This Product, Limited Warranty and Limitation of Liability, which may not be modified by any oral or written agreement.

[Or alternate text]

[IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of MGK. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MGK MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of MGK is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, MGK disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT MGK'S ELECTION, THE REPLACEMENT OF PRODUCT.]

[Or alternate text]

[Note [Notice]: Seller warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, seller shall have no liability for consequential damages.]

[Or alternate text]

[Notice: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.]

[Or alternate text]

[NOTICE TO USER

To the fullest extent permitted by law, seller makes no warranty, express or implied, of merchantability, fitness or otherwise concerning the use of this product other than as indicated on the label. User assumes all risks of use, storage or handling not in strict accordance with accompanying directions.]

[] Denotes alternate text in addition to any sub-set of the directions for use.