

# OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 8, 2025

Thomas Lennan
Senior Regulatory Affairs Specialist
McLaughlin Gormley King Company
7325 Aspen Lane N
Minneapolis, MN 55428

Subject: Label Amendment - Registration Review Mitigation for Prallethrin and

Deltamethrin

Product Name: MGK Formula 31021 EPA Registration Number: 1021-2795 Application Date: February 10, 2021

Case Number: 483124

# Dear Thomas Lennan:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Prallethrin and Deltamethrin Interim Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Lauren Weisenborn via email at weissenborn.lauren@epa.gov.

Sincerely,

Cathryn Britton

Cathuy Sutter

Chief, Risk Management and Implementation

Branch V

Pesticide Re-evaluation Division (7508M)

Office of Pesticide Programs

**ENCLOSURE: Stamped label** 

# MGK® FORMULA 31021

**ACTIVE INGREDIENT:** 

 Deltamethrin
 0.02000%

 Prallethrin
 0.00625%

 OTHER INGREDIENTS:
 99.97375%

 100.00000%

Contains 0.00166 lbs. Deltamethrin per Gallon Contains 0.00052 lbs. Prallethrin per Gallon

# **KEEP OUT OF REACH OF CHILDREN**

#### FIRST AID

#### HOTLINE 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:



EPA Reg. No. 1021-2795

EPA Est. No. 1021-MN-2

Net Contents: x fl. Ounces

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

# **CAUTION**

Contact with product may result in transient tingling and reddening of the skin. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

### **ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or runoff into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are foraging in the treatment area.

# PHYSICAL OR CHEMICAL HAZARDS

Do not apply this product in or on electrical equipment due to possibility of shock hazard.

SHAKE WELL BEFORE EACH USE

FOR BOTH INDOOR AND OUTDOOR USE

ACCEPTED

09/08/2025

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No.

1021-2795

#### DIRECTIONS FOR USE

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

# READ ENTIRE LABEL BEFORE USE

# USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

# Kills/ Insects Controlled

Ants [including Argentine, Fire, Harvester & Pharaoh excluding Carpenter ants], Asian Lady Bird Beetles (Lady bugs), Biting Midges, Black Flies, Boxelder Bugs, Carpet Beetles (Black, Furniture and Varied), Chiggers, Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Cockroaches [American and German Cockroaches], Crickets, Deer Flies, Dermestids, Drugstore Beetles, Elm leaf Beetles, Firebrats, Flour Beetles (Red and Confused), Grain Beetles (Rusty, Merchant and Sawtoothed), Ground Beetles, Horse Flies, House Flies, Lesser Grain Borers, Palmetto Bugs, Pillbugs, Rice Weevils, Scorpions, Silverfish, Small Flying Moths, Spider Beetles, Spiders (including brown recluse, black widow & hobo spiders), Sowbugs, Stable Flies, Stink Bugs, Tobacco Moths, Waterbugs and Webbing Clothes Moths

# Where to Use/Apply

For Use in Residential Homes [and Buildings] including:

Apartments/Automobiles/Boats/Cabins/Campers/Condos/Dog

Houses/Duplexes/Garages/Gazebos/Homes/Household/Storage Areas/Sheds/Townhomes

# **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 should 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
- Do not allow to enter indoor or outdoor drains. No permita la entrada a desagües internos o externos.



{Note to reviewer: Pictogram must be no smaller than 1.5 cm² or 0.25 sq. in, unless size is greater than 10% of label size}

 All outdoor spray applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

# Before You Use/Apply: Read Instructions Before Using

- 1. Application to pervious surfaces such as soil, lawn, turf, and other vegetation;
- 2. Perimeter band treatments of 7 feet wide or less from the base of a man-made structure to pervious surfaces (e.g., soil, mulch, or lawn);
- 3. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
- 4. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
- 5. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level;
- 6. Applications to vertical surfaces directly above pervious surfaces, such as soil, lawn, turf, mulch or other vegetation) only if the pervious surface does not drain into ditches, storm drains, gutters, or surface waters.
  - Spot treatments must not exceed two square feet in size. (for example, 2 ft. by 1 ft. or 4 ft. by 0.5 ft.)
  - Do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
  - Do not spray the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers
    or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water
    bodies, or aquatic habitat can occur.
  - Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
  - Do not make applications during rain. Avoid making applications when rainfall is expected before
    the product has sufficient time to dry (minimum 4 hours). Rainfall within 24 hours after application may cause
    unintended runoff of pesticide application.
  - Do not apply when the wind speed is greater than 15 mph.

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	Do not contaminate fish ponds or apply directly to water. Do not water the treated area to the point of runoff. Do not make applications during rain.		
	Application is prohibited directly into sewers drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.		
How to Use/Apply	SEE APPLICATOR OPTIONS 1 THRU 7 BELOW		
When/How Much to Use/Apply [Application Rate(s)]	Contact Spray	Spray where insects congregate and individual pests when seen. Spray 1-3 pumps [1-3 second spray] contacting insects directly. Use one pump [1 second spray] (1g ) <b>to kill</b> cockroaches, spiders, including black widow spiders (excluding brown recluse and hobo spiders), fire ants, pharaoh ants, biting midges, black flies.  Use [two pumps] [2 second spray] (2g ) <b>to kill</b> harvester ants, black flies, chiggers, ants (excluding carpenter ants) Use [three pumps] [3 second spray](3g) to kill horse flies, deer flies, brown recluse spiders and hobo spiders, house flies  For Asian lady beetles, stink bugs and other large insects. Insects contacted by spray will be killed.	
	Barrier Spray	Use when you see insects in home and when seasonal invading insects are likely to enter home. Use at rate of 1 gallon per 1,000 square feet for American cockroaches, Black Widow spiders, Asian Lady [Bird] Beetles (Lady bugs), Biting Midges, Boxelder Bugs, Carpet Beetles (Black, Furniture and Varied), Chiggers, Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Crickets, Dermestids, Drugstore Beetles, Elm leaf Beetles, Firebrats, Flour Beetles (Red and Confused), Grain Beetles (Rusty, Merchant and Sawtoothed), Ground Beetles, Lesser Grain Borers, Pillbugs, Rice Weevils, Silverfish, Small Flying Moths, Spider Beetles, Sowbugs, Stink Bugs, Tobacco Moths, Waterbugs and Webbing Clothes Moths.	

How to Use/ Apply Indoors	To Kill Cockroaches [American and German Cockroaches]), Ants [including Argentine, Fire, Harvester & Pharaoh, excluding Carpenter Ants], Boxelder Bugs, Crickets, Dermestids, Firebrats, Fleas, Palmetto Bugs, Silverfish, Sowbugs, and Waterbugs	Contact: Apply directly to arthropods in areas where these pests crawl and hide, especially in hidden areas around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, bookcases, and similar areas. Cover all food handling surfaces and cover or remove all food and cooking utensils or wash thoroughly after treatment. Exposed food should be covered or removed. Repeat as necessary but not more than once per week.
	To Kill [American cockroaches, Black Widow spiders, Asian Lady [Bird] Beetles (Lady bugs), Biting Midges, Boxelder Bugs, Carpet Beetles (Black, Furniture and Varied), Chiggers, Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Crickets, Dermestids, Drugstore Beetles, Elm leaf Beetles, Firebrats, Flour Beetles (Red and Confused), Grain Beetles (Rusty, Merchant and Sawtoothed), Ground Beetles, Lesser Grain Borers, Pillbugs, Rice Weevils, Silverfish, Small Flying Moths, Spider Beetles, Sowbugs, Stink Bugs, Tobacco Moths, Waterbugs and Webbing Clothes Moths]	Contact: Apply directly to pest.  Barrier: Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.
	To Kill Ants, Excluding Carpenter Ants	Contact: Spray ants directly while on ant trails and around doors and windows and other places where ants enter the house. Use [2 pumps] [2 second spray] (2 gm) to kill ants.
	To Kill Spiders	Apply along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl. Use [three pumps] [3 second spray](3g) to kill spiders.
	Ground Beetles, Pillbugs, Sowbugs	Contact: Apply directly to pest.  Barrier: Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.
	Silverfish, Crickets	Contact: Apply directly to pest.  Barrier: Apply to areas infested by these pests
	Asian Lady [Bird] Beetles (Lady bugs), Boxelder Bugs, Stink Bugs	Contact: Apply directly to pest.  Barrier: Spray areas where bugs crawl or rest, around doors, windows and areas where insects can enter the home.
	House flies and Small Flying Moths	Contact: Spray directly to house flies on localized resting areas, such as under eaves, porches, inside surfaces of window and door frames, surfaces around light fixtures and cords, railings, etc., and anywhere these insects may rest. Small flying moths coming to rest on treated surfaces will be killed.
	HORSE STABLES: To Control, House Flies, Horse Flies, and Deer Flies.	Contact: Apply directly to pests. Repeat treatment as necessary but not more than once per week. Do not spray animals or humans, or apply to animal feed or watering equipment. Controls Stable Flies for up to 4 months.
	PANTRY PESTS - Grain Beetles (Rusty, Merchant and Sawtoothed), Flour Beetles (Red and Confused), Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths	Remove all food-stuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs.  Contact: Apply directly to pest.  Barrier: Treat exposed stages. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow to dry prior to replacement of shelf paper, food and utensils. Wash any exposed food handling surfaces and utensils before use.  Contact: Apply directly to pest.
	Carpet Beetles (Black, Furniture and Varied)	Barrier: Spray on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.  Contact: Apply directly to pest.
	Webbing Clothes Moths	Barrier: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on clothes. Do not apply to clothing.
	HOUSE PLANTS: To control Aphids, Japanese Beetles, Lace Bugs, Leafminers, Mealybugs, Mites and Spider Mites	Prior to spraying, remove plants from living and eating areas. Put in an area not likely to come in contact with pets, children or food. Plants can be returned to original location when leaves dry. If plants cannot be moved, cover or remove exposed food and food handling surfaces. Avoid spraying surrounding areas.
		Contact: Apply directly to pest.  Barrier: Apply spray to upper and lower surfaces of foliage.  Avoid wetting blossoms if possible. Repeat applications as necessary but not more than once per week.

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		Contact: Apply directly to pest.		
	Clover Mites, Crickets and Sowbugs (Pillbugs)	Barrier: Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. Apply to outside surfaces of buildings where insects tend to congregate. Spray areas include (but are not limited to) screens, window frames, eaves, porches, patios, garages and refuse dumps. Repeat treatment as necessary but not more than once per week.		
	To Kill: American, Cockroaches, Crickets, Mole Crickets, Waterbugs and Silverfish	Contact: Apply directly to pest.  Barrier: Spray infested surfaces of patio or picnic area, hitting as many insects as possible.  Spray to slightly moisten the surface. Also spray legs of tables and chairs. Apply thoroughly to		
	Waterbugs and Silvernsii	infestation in bushes, grass or weeds.		
	To Kill Ants, excluding Carpenter Ants	Contact: Spray ants directly on ant trails and hills. Break apart accessible nests and spray freely on and around debris. Repeat as necessary but not more than once per week. [If nest can be located, spray surface of nest until wet.]		
	To Kill Spiders	Contact: Spray directly on insect where bugs crawl or rest, especially around doors, on and around windows, doorframes, in corners and under eaves.		
How to Use/Apply	Asian Lady [Bird] Beetles (Lady bugs), Boxelder Bugs, Stink Bugs	Contact: Apply directly to pest.  Barrier: Spray areas where bugs crawl or rest, especially around doors, on and around screens, windows, doorframes and areas where insects can enter the home. Remove screens prior to spraying them, allow to dry and then reinstall them.		
Outdoors		Contact: Apply directly to pest.		
Outdoors	House Flies, and Small Flying Moths	Barrier: Spray outside surfaces of window and door frames and other areas where these pests may enter the home. Also spray localized resting areas, such as under eaves, porches, surfaces around light fixtures and cords, railings, etc. where these insects may rest. Insects coming to rest on treated surfaces will be killed.		
	FOR CONTROL OF ORNAMENTAL	Not for use on plants grown for sale or other commercial use.		
	GARDEN INSECTS For use on roses, dahlias, asters and other	May be used on plants, as well as a multi-purpose spray in small ornamental gardens and for spot treatments to prevent insects from spreading into large garden areas.		
	ornamentals to kill Japanese Beetles hit by spray, as well as Whiteflies, Aphids, Armyworms, Lace Bugs,	May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, delphiniums, dogwood, English ivy, euonymus, fuchsia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, rubber plants, snapdragons, stocks, wandering Jews and zinnias.		
	Mealybugs, Exposed Thrips, Pavement Ants, Spiders, Spider and Red Mites, Clover Mites and Leafminers	When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. DO NOT apply to vegetable plants or other plants used for food. Spray insects directly whenever possible.		
For Crack and Crevice Treatments: Treat surfaces to ensure thorough coverage but avoid runoff. To treat insects harbored in voids and cracks-				

For Crack and Crevice Treatments: Treat surfaces to ensure thorough coverage but avoid runoff. To treat insects harbored in voids and cracksand-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants.

MGK 3102 [PRODUCT NAME] is an easy, ready- to-use water-based formula for application with handheld trigger-spray bottle or wand applicator.

# Directions For Use Options Based On Applicator

# Option 1 – for Nonspecific spray container

# [HOW TO APPLY/USE: [icon]

- Hold with applicator aimed away from you.
- For barrier application, spray surfaces from a distance of 8 to 10 inches
- For direct spray application, spray pest directly from a distance of 8 to 10 inches
- Apply at rate of 1 gallon per 1,000 square feet]

# STORAGE & DISPOSAL

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

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

<u>PESTICIDE STORAGE</u>: Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

<u>PESTICIDE DISPOSAL AND/& CONTAINER HANDLING</u>: Do not reuse or refill this container except as allowed in the directions for use. **If empty:** Place in trash or offer for recycling if available.

If partly filled: Do not pour or dispose down-the-drain or sewer Call your local solid waste agency for disposal instructions.

#### **End of Option 1**

### Option 2 - for Trigger Sprayer [Applicator Name]

[[Applicator Name] [Applicator/Sprayer] Directions]

# [HOW TO APPLY/USE: [icon]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired. [Set sprayer to a coarse spray.]
- For barrier application, spray surfaces from a distance of 8 to 10 inches
- For direct spray application, spray pest directly from a distance of 8 to 10 inches
- Apply at rate of 1 gallon per 1,000 square feet (spray until slightly damp)]

# STORAGE & DISPOSAL

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

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

<u>PESTICIDE STORAGE</u>: [Small] [Applicator Name] Rotate nozzle to closed position -OR- Turn sprayer nozzle to "OFF [X]. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING: Non-refillable 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.

<u>PESTICIDE STORAGE</u>: [Large] [Applicator Name] Place trigger sprayer under handle on container to keep sprayer above the level of contents. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Do not pour or dispose down-the-drain or sewer Call your local solid waste agency for disposal instructions.

# End of Option 2

# Option 3 [Quick Connect Trigger] [Applicator Name]

[[Applicator Name] [Applicator/Sprayer] Directions]

[Quick Connect Sprayer] [1. Pull sprayer from bottle. 2. Pull [color] hose connector and coil from sprayer handle. 3. Insert hose connector into [color] spout on cap [until it clicks] into place.] [4.] [Flip up spout.] Turn sprayer nozzle to open, and [pull trigger to] spray.

or

[Quick Connect Sprayer] [1. Remove sprayer. Pull cord ALL THE WAY OUT. 2. Insert [color] plug into spout [on cap] [until it clicks].] [3.] [Flip up spout.] Open nozzle at end of sprayer [and pull trigger to spray].

Note to PM: Illustrations may be associated with each step.

#### [HOW TO APPLY/USE: [icon]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired. [Set sprayer to a coarse spray.]
- For barrier application, spray surfaces from a distance of 8 to 10 inches
- For direct spray application, spray pest directly from a distance of 8 to 10 inches
- Apply at rate of 1 gallon per 1,000 square feet (spray until slightly damp)]

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# STORAGE & DISPOSAL

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

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

<u>PESTICIDE STORAGE</u>: [Applicator Name] Flip down spout to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer [Turn sprayer nozzle to "OFF" [X]. Snap sprayer back in place. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for disposal instructions.

# End of Option 3

#### Option 4 - Pull 'N Spray II

[[Applicator Name] [Applicator/Sprayer] Directions]

### [Illustration #1]

- Remove sprayer from side carrier and unwrap hose completely.
- Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks.
- [Flip up spout]. Spout must remain up while spraying.

# [Illustration #2]

Twist nozzle at end of sprayer to desired spray pattern.

# [Illustration #3]

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops and hold for two (2) seconds to ready the sprayer.

# [Illustration #4]

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

# [HOW TO APPLY/USE: [icon]

- Follow illustrations and instructions above.
- Twist nozzle at end of sprayer to desired spray pattern.
- Point sprayer away from body and press sprayer button to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.
- For barrier application, spray surfaces from a distance of 8 to 10 inches
- For direct spray application, spray pest directly from a distance of 8 to 10 inches
- Apply at rate of 1 gallon per 1,000 square feet (spray until slightly damp)]

# Optional Refill [and Reuse] Directions

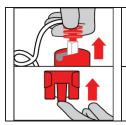
[The Pull 'N Spray II/Applicator Name [applicator/wand] may be reused with the available MGK® FORMULA 31021 [Product Name] refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.] --OR--

[REFILL: This container may be refilled with MGK® FORMULA 31021 [Product Name]. To refill pour MGK® FORMULA 31021 [Product Name] into container.]

#### Refill [and Reuse] Directions

How to attach the [Pull 'N Spray II/Applicator Name] [applicator/wand] to MGK® FORMULA 31021 [Product Name] [refill bottle]:

Removing [Pull 'N Spray II/Applicator Name] [applicator] from original bottle:

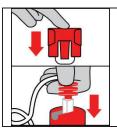


Remove the [applicator name] [applicator] by pulling the [color of plug] [red] plug from the [color of spout] [red] spout on cap. [Illustration]

[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]

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Adding [Pull 'N Spray II/Applicator Name] [applicator] to MGK® FORMULA 31021 [Product Name]:



[Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container.] [Illustration]

Insert [color of plug] [red] plug at end of hose into [color of spout] [red] spout on cap [until it clicks]. [Illustration]

# STORAGE & DISPOSAL

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

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

<u>PESTICIDE STORAGE</u>: [Pull 'N Spray II/Applicator Name] [Applicator]: Completely discharge/dispense product in sprayer prior to storage. Flip down [color of spout] spout on cap. DO NOT DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside carrier on bottle with the nozzle facing down. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING: Pull 'N Spray II/Applicator Name can be reused with MGK® FORMULA 31021 [Product Name] refill bottle/container. Follow instructions in the Reuse Directions when reusing [applicator name]. Do not reuse or refill this container except as allowed in the directions for use. Refill this container with MGK® FORMULA 31021 [Product Name] only.

If empty: Place in trash or offer for recycling if available.

If partly filled: Do not pour or dispose down-the-drain or sewer Call your local solid waste agency for disposal instructions.

# End of Option 4

#### Option 5 - Comfort Wand [Applicator Name]

[[Applicator Name] [Applicator/Wand] Directions]

- [[1. Remove] Remove [applicator name] Wand from side [holder/clip] [Illustration #1 & 2]
- [Unwrap hose completely]
- [Remove protective strip from battery compartment to activate batteries]
- [2. Connect] Insert [color of plug] plug at end of hose into [color of spout] spout on cap [until it clicks. Flip up spout.] [Spout must remain up while spraying] [Illustration #3]
- [3. Extend] Flip open [applicator name] wand until it locks into position [Illustration #4]
- [4. Spray] Twist nozzle at end of [applicator name] wand to desired spray pattern. [Ensure trigger lock is disengaged before spraying.] Hold [color of trigger] trigger for continuous spray. [Illustration #5]

# [HOW TO APPLY/USE: [icon]

- Follow illustrations and instructions above.
- Twist nozzle at end of [applicator name] wand to desired spray pattern.
- Point [applicator name] wand away from body and hold [color of trigger] trigger for continuous spray.
- Release trigger to stop spray.
- For barrier application, spray surfaces from a distance of 8 to 10 inches
- For direct spray application, spray pest directly from a distance of 8 to 10 inches
- Apply at rate of 1 gallon per 1,000 square feet (spray until slightly damp)]

After Use: twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and store on the side [holder/clip].

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment at bottom of [applicator name] wand. Remove used batteries and replace with four new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

# Optional Refill [and Reuse] Directions

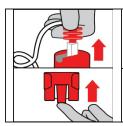
[The Comfort Wand/Applicator Name [applicator/wand] may be reused with MGK<sup>®</sup> FORMULA 31021 [Product Name] refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.] --OR--

[REFILL: This container may be refilled with MGK® FORMULA 31021 [Product Name]. To refill pour MGK® FORMULA 31021 [Product Name] into container.]

# Refill [and Reuse] Directions

How to attach the [Comfort Wand/Applicator Name] [applicator/wand] to MGK® FORMULA 31021 [Product Name] [refill bottle]:

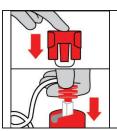
Removing [Comfort Wand/Applicator Name] [applicator] from original bottle:



Remove the [applicator name] [applicator] by pulling the [color of plug] [red] plug from the [color of spout] [red] spout on cap. [Illustration]

[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]

Adding [Comfort Wand/Applicator Name] [applicator] to MGK® FORMULA 31021 [Product Name]:



[Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container.] [Illustration]

Insert [color of plug] [red] plug at end of hose into [color of spout] [red] spout on cap [until it clicks]. [Illustration]

# STORAGE & DISPOSAL

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

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

PESTICIDE STORAGE: [Applicator Name] [Applicator]: Flip down (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.]. Flip the [applicator name] wand closed and place [sprayer] back inside carrier [clip] [holder]. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING: Comfort Wand /Applicator Name can be reused with MGK® FORMULA 31021 [Product Name] refill bottle/container. Follow instructions in Reuse Directions when reusing [applicator name]. Do not reuse or refill this container except as allowed in the directions for use. Refill this container with MGK® FORMULA 31021 [Product Name] only.

If empty: Place Do not pour or dispose down-the-drain or sewer in trash or offer for recycling if available.

If partly filled: Do not pour or dispose down-the-drain or sewer Call your local solid waste agency for disposal instruction.

#### **End of Option 5**

#### Option 6 - EZ Sprayer [Pump 'n Go] [Applicator Name]

[[Applicator Name] [Applicator] Directions]

#### CUT [Illustration # 1]

1. Carefully cut the two [enter color] [white] zip ties securing the hose and pump handle with scissors. Use caution not to cut the [enter color] [white] hose.

# **CONNECT** [Illustration #2]

2. Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

#### EXTEND WAND [Illustration #3]

3. Lift sprayer wand off bottle. Push [enter color] [yellow] button while pulling out on the wand nozzle tip. Fully extend wand until [enter color] [yellow] button snaps into SPRAY position. NOTE: [White] [color of] trigger will not function until wand is fully extended and [enter color] yellow button is visible in the spray position.

# PUMP [Illustration # 4]

4. Make sure handle is screwed on TIGHTLY or the bottle will not pressurize. Pump container 10-20 [X-X] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

#### SPRAY [Illustration # 5]

5. Aim wand. Spray by pushing down [enter color] [white] trigger with thumb. Adjust spray pattern by rotating [enter color] [white] nozzle tip up to one-half rotation. For barrier application, spray surfaces from a distance of 8 to 10 inches. For direct spray application, spray pest directly from a distance of 8 to 10 inches. Apply at rate of 1 gallon per 1,000 square feet (Spray until slightly damp)

#### STORE [Illustration # 6]

6. When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down.

### **DEPRESSURIZE** [Illustration # 7]

7. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten prior to storing.

# Option 7 - Other Pump Style [Quick Pump] [Applicator Name]

[[Applicator Name] [Applicator] Directions]

### [1.] TO USE

Remove wand from holster and pull the hose from the storage compartment. Turn the pump handle clockwise to make sure the pump is tight [and push the pop-up pressure indicator completely down] before pumping. [illustration #1]

# [2.] TO PUMP

Turn the pump handle clockwise [one-quarter turn] to release the handle. Pump the sprayer [until the pressure indicator pops up about an inch]. [That's your signal you are ready to spray.] Turn the pump handle counterclockwise [one-quarter turn] to secure the handle for carrying. [illustration #2]

#### [3.] TO SPRAY

Begin spraying by pushing the lever on the spray handle down. Rotate the nozzle at the tip of the wand to adjust spray from a stream to gentle mist. For continuous spraying, push the lever down and slide forward to lock. Pull back to release. For barrier application, hold 8 to 10 inches from the surface to be sprayed. For direct spray application, hold 8 to 10 inches from the pest to be sprayed. Spray surface until slightly damp. [illustration #3]

# [4.] TO STORE

Slowly turn the pump handle counterclockwise to untighten and release pressure, then turn back clockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster. [illustration #4]

# [HOW TO APPLY/USE: [icon]

- Follow illustrations and instructions above.
- Point [applicator name] away from body Release trigger to stop spray.
- For barrier application, spray surfaces from a distance of 8 to 10 inches
- For direct spray application, spray pest directly from a distance of 8 to 10 inches
- Apply at rate of 1 gallon per 1,000 square feet (Spray until slightly damp)]

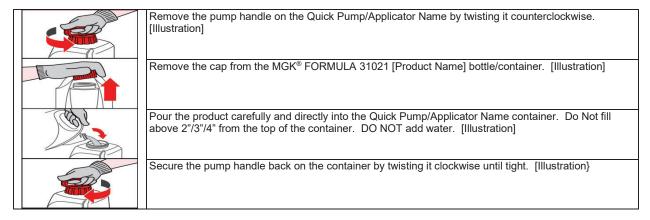
#### Optional Refill land Reusel Directions

[This product is also available for sale in a refill bottle/container. Read and follow instructions in the Refill Directions to refill the original container with the Quick Pump/Applicator Name [applicator]. Do not refill this bottle/container with any other product.] --OR--

[REFILL: This container may be refilled with MGK® FORMULA 31021 [Product Name]. To refill pour MGK® FORMULA 31021 [Product Name] into container.]

# Refill [and Reuse] Directions

How to refill MGK® FORMULA 31021 [Product Name] with [Quick Pump/Applicator Name] [applicator]:



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# STORAGE & DISPOSAL

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

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

<u>PESTICIDE STORAGE</u>: Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING [Refillable Container]: Do not reuse or refill this except as allowed in the directions for use. Refill this container with MGK® FORMULA 31021 [Product Name] only. 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.

PESTICIDE DIPSOSAL AND CONTAINER HANDLING [Non-Refillable Option]: Non-refillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Do not pour or dispose down-the-drain or sewer Call your local solid waste agency for disposal instructions.

# End of Options 6 and 7

# Optional Trouble Shooting Section for [Battery Powered Wand] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer] [Applicator name]

Troubleshooting Tips:

Problem: Sprayer does not spray [function].
Possible Cause: Batteries not installed properly.
Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but nothing [no product] comes out].

Possible Cause: Nozzle is turned Off.

Solution: Turn nozzle to (desired) spray setting [position].

Possible Cause: [Red] [color] plug at end of hose is not flipped up.

Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap [until it clicks and flip up spout.]

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about [X] (10/ 15/ 20/ 30) seconds to prime the sprayer.

# 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.

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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.

### **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]

#### INOTICE 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.]

#### **OPTIONAL MARKETING CLAIMS:**

Note to PM: When qualified claims are used on the market label, the qualifying statement will appear in close proximity to the claim when it does not impact any mandatory language.

#### Kill Claims

- Kills Asian Lady [bird] Beetles
- Kills Asian Lady bugs by contact
- Kills Spiders
- Kills Roaches/Cockroaches/Palmetto Bugs, Ants (excluding carpenter ants)
- Kills Aphids, Mealybugs, Lace Bugs, Thrips, Leafminers and Mites
- Kills Spider Mites
- Kills Japanese Beetles
- Plus Kills Ants (excluding Carpenter Ants), Crickets, Spiders, Listed Flies & Other Listed Pests
- Kills a wide range of Listed Crawling, Flying and Wood Infesting Pests
- Also Controls: Carpenter Bees

#### Speed Claims

- Dual Action
- Starts killing house flies in under/[less than] a minute/[60 seconds]\*
- Starts killing black widow spiders in less than 7 minutes\*
- Starts killing Asian lady beetles in under/[less than] a minute/[60 seconds]\*
- Starts killing Stink bugs within 7 minutes\*

#### Residual Claims

- Keeps Killing Lady Beetles for up to 35 Days
- Keeps on Killing [German & American] Cockroaches and Argentine Ants for Up to 12 Months [1 year]\*
- Protects Against [German & American] Cockroaches and Argentine Ants for Up to 12 Months [1 year]\*
- Keeps Killing German Cockroaches for Up to 3 Months [12 Weeks]\*

# General Claims

- For use in Residential/Commercial Buildings
- Dual Purpose Spray
- [Use as] Barrier Spray/[Direct] Contact Spray
- Non-staining
- No visible/oily residue
- Low odor
- [Unique] water-based [formula]
- Easy-to-Use [Trigger/Automated] Spray
- For Residential/Commercial Use [Only]
- [No Ozone Depleting Propellants]
- For Indoor and Outdoor Use
- Ready-To-Use
- Water-Based
- 100% Satisfaction Guaranteed
- This product is non-staining, leaves no oily residue
- [Now] XX % More [\*]

# **END OPTIONAL MARKETING CLAIMS**

<sup>\*</sup>When used as directed on specific pest

<sup>\*</sup> on non-porous surfaces

<sup>\*</sup> versus XX [fl. oz.] [gallon] size]