

1769-378

07/09/2007

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

JUL -9 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dan Hollas
NCH Corporation
2727 Chemsearch Blvd.
Irving, TX 75062

Dear Mr. Hollas:

Subject: Watchtower Mosquito Mister
EPA Reg. No. 1769-378
Submission D375167 dated 2/21/2007

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 comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

In accordance with your email stating that you do not plan to package and sell the aerosol with any equipment, injection tubes or otherwise, the marketing claims on the first and last pages must be modified as follows:

May be used in the [BeaconTM Aerosol Dispenser (sold separately)] [Dispenser (sold separately)] [Mister (sold separately)] [Mosquito mister (sold separately)]...

Similarly, in accordance with the email stating that you do not plan to package and sell the aerosol with any equipment, injection tubes or otherwise, revise the directions for use about actuator, injection tubes or other (NCH) equipment to read as follows:

Follow the instructions included with the [dispenser (sold separately)][mister (sold separately)] to install aerosol can in [dispenser] [mister]...

...apply as a fine mist using the [Beacon Aerosol Dispenser (sold separately)] [dispenser (sold separately)] [mister (sold separately)]...

Use only with the actuator (sold separately) and injection tube (sold separately) or other (NCH) equipment (sold separately).

Delete the marketing claims "Kills with Pyrethrin, an extract of the chrysanthemum flower". The claim "Contains pyrethrin, a botanical pesticide" is acceptable.

Since this product contains petroleum distillate, revise the first sentence of the First Aid statements in accordance with PR Notice 2001-1 as follows:

If swallowed: Immediately call a poison control center or doctor.

In accordance with the Pyrethrins RED, revise the Environmental Hazards statements to read as follows:

This product is toxic to aquatic organisms, including fish and invertebrates. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements. Do not apply directly to or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas.

In the directions for use, qualify the ant claim to read as follows: "ants, except carpenter, pharaoh, fire and harvester ants".

In accordance with the Pyrethrins RED, in the Directions for Use revise the heading "Use Precautions" to read "General Precautions and Restrictions" and move the statement "Remove pets, birds and cover fish aquariums before spraying" to this section.

Move the directions on aerosols working best when can temperature is above 60° to the pesticide storage section.

In the Directions for Use on bedbugs, revise the second sentence to read as follows: Treat joints and channels. If hollow, such as square or round tubing, treat the interior framework.

Separate the outdoor treatments directions into two sections, one entitled Directions for hand held aerosol application outdoors and the other for outdoor residential misting systems.

In accordance with the Pyrethrins RED, revise the directions for hand held aerosol application outdoors to incorporate the following:

Do not apply more than 1 time per day. Do not allow adults, children or pets to enter the treated areas until sprays have dried. Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) or apply prior to heavy rainfall.

In accordance with the Pyrethrins RED, revise the directions for use in outdoor misting systems to incorporate the following:

Directions for use in outdoor residential misting systems

When using this product installers and service technicians must comply with the license, certification, or registration requirements of the state(s), tribe(s), or local authority(ies) where they are installed. If the system works on an automatic timer, set the timing for application when people, pets, and food are unlikely to be present. If the system works when a person operates a remote activation device,

then application of this pesticide when people, pets, and food are present is prohibited.

Do not use in an evaporative cooling system.

Direct nozzles to spray towards the target area and away from swimming pools, water bodies, or eating and cooking areas.”

If used in a system with a reservoir tank for the end use dilution, the system reservoir tank must be locked. Securely attach the end use pesticide label and a dilution statement to the system reservoir tank in a weather protected area or plastic sleeve. The dilution statement must be phrased as follows: this container holds __ parts [*product name*] to __ parts water.

If used in a direct injection system, the pesticide container must be locked. Securely attach the end use label to the pesticide container in a weather protected area or plastic sleeve.

This product must only be used in systems that have been calibrated to apply no more than the maximum application rate of [insert product application rate that is equal to 0.00011 lbs pyrethrins per 1000 cubic feet per day]. [Also express this application rate as pounds or gallons of end-use product formulation.]

In accordance with the efficacy review, add the following statement:
The dispenser/mister may be used only when pests are present.

Revise the directions for hanging the dispenser/mister to read as follows:
Hang the dispenser/mister 6 feet above the ground, out of reach of children and pets.

Delete from the directions for use in the dispenser/mister any claim to control mosquitoes.

Note that Notices of Availability of EPA's Reregistration Eligibility Decision (RED) document for products contain pyrethrins and piperonyl butoxide were published on July 26, 2006. Copies are available on the EPA website as follows:

http://www.epa.gov/opprrd1/REDs/pyrethrins_red.pdf

http://www.epa.gov/pesticides/reregistration/REDs/piperonyl_red.pdf.

As a result, additional data and/or labeling changes may be required for products containing these active ingredients.

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Copies of the stamped label and efficacy review are enclosed. If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

for Ann Sibold
Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

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WATCHTOWER™ MOSQUITO MISTER

CONTACT INSECTICIDE

Helps protect your family from mosquitoes

Kills [Cluster Flies][Flies][Fruit Flies][Gnats][Horn Flies][House Flies][Mosquitoes][Small Flying Moths][Stable Flies] and other flying insects fast.

Effectively kills [Cluster Flies][Flies][Fruit Flies][Gnats][Horn Flies][House Flies][Mosquitoes][Small Flying Moths][Stable Flies].

Kills on contact

No harsh insecticide odor

Contains pyrethrin, a botanical pesticide

May be used in the [Beacon™ Aerosol Dispenser][Dispenser][Mister] [sold by][from] [NCH Corporation]

Kills with Pyrethrin, an extract of the Chrysanthemum flower

KILLS

Angoumois Grain Moths, Ants, Bed Bugs, Booklice, Carpet Beetles, Centipedes, Chocolate Moths, Cigarette Beetles, Clothes Moths, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Drug Store Beetles, Earwigs, Fleas, Flies, Fruit Flies, Gnats, Grain Mites, Granary Weevils, Horn Flies, House Flies, Indian Meal Moths, Mediterranean Flour Moths, Millipedes, Mosquitoes, Mud Daubers, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Silverfish, Small Flying Moths, Sawbugs, Spiders, Stable Flies, Ticks, and Wasps.

FOR USE IN AND AROUND

Apartments, Campgrounds, Food Storage Areas, Homes, Hospitals*, Hotels, Motels, Nursing Homes*, Resorts, Restaurants*, and other Food Handling Establishments*, Schools, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains, Trucks, and Aircraft - Cargo Areas Only), Utilities, Warehouses, and other Commercial and Industrial buildings.

* See special instructions for these sites under Directions for Use

ACTIVE INGREDIENTS

Pyrethrins, a botanical insecticide..... 0.5%

Piperonyl Butoxide, Technical..... 4.0%

OTHER INGREDIENTS.....95.5%

TOTAL.....100.0%

Contains petroleum distillate.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUL - 9 2007

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
1769-378**

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED: Immediately call a poison control center or doctor for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give ANY liquid to the person. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: 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: 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 eye. 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 additional information, you may call CHEMTREC® at 1-800-424-9300, or the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

See (side panel) (back panel) (elsewhere) for additional precautionary statements.

EPA Reg. No. 1769-378
EPA Est. No.

NCH Corporation
2727 Chemsearch Blvd.
Irving, Texas 75062

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NET WEIGHT: [10 oz / 284 g] [18 oz (1 lb 2 oz) / 510 g] [23 oz (1 lb 7 oz) / 652 g]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash hands thoroughly before eating, drinking, chewing gum, or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Remove pets, birds and cover fish aquariums before spraying. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Extremely Flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

DIRECTIONS FOR USE

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

USE PRECAUTIONS

- Use only with the supplied actuator and injection tubes or other (NCH) equipment.
- Do not spray on public, painted, or varnished surfaces or directly into any electronic equipment such as radios, televisions, computers, etc.
- Aerosols work best when can temperature is above 60°F. If temperature is below 60°F, store at room temperature until a temperature above 60°F is reached.

CRACK AND CREVICE TREATMENT: Inject WATCHTOWER™ MOSQUITO MISTER into cracks and crevices or void spaces where insects may be harboring, living, and breeding. Place injector tip into cracks, crevices, holes, and other small openings.

SPACE TREATMENT: Calculate the cubic footage to be treated and apply at the dosage rate specified below for the pest(s) to be treated. Thoroughly ventilate treated areas before reoccupying.

INDOOR TREATMENTS

CLUSTER FLIES, FLIES, FRUIT FLIES, GNATS, HORN FLIES, HOUSE FLIES, MOSQUITOES, SMALL FLYING MOTHS AND STABLE FLIES: Apply as a space treatment at a rate of 1 to 3 seconds per 1,000 ft³. Close all windows and doors. Direct aerosol upward and disperse in all locations. Keep area closed for 15 minutes. Thoroughly ventilate treated areas before reoccupying.

CLUSTER FLIES, CLOVER MITES, WASPS, AND BEES INSIDE STRUCTURAL VOIDS: For treatment of these pests, locate all insect entrances and close all but one opening. Determine size of void. Inject 5 to 10 seconds per 3 ft³ of void into remaining opening. For best results, treat at dusk or later.

ANTS, BOOKLICE, CENTIPEDES, CLOVER MITES, CRICKETS, MILLIPEDES, ROACHES, SILVERFISH, SOWBUGS, AND SPIDERS: Apply as a crack & crevice treatment in cracks, crevices, and areas where these pests hide (such as behind baseboards, sinks, cabinets, meter boxes, door frames, and windows). For space treatments, apply at a rate of 20 seconds per 1,000 ft³. Open cabinets and doors in area to be treated, turn off air conditioners and fans and close doors and windows before treating. Disperse toward area suspected of harboring the greatest insect infestations. Disperse in all locations contacting as many insects as possible. Keep area closed for 15 minutes. Thoroughly ventilate treated areas before reoccupying.

For treatment of void areas such as attics, false ceilings and crawl spaces, calculate the volume of the void and treat at a rate of 20 seconds per 1,000 ft³.

BED BUGS: Take bed apart. Treat joints and channels if hollow, such as square or round tubing, and see that the interior framework is treated. Treat mattresses, especially tufts, folds, and edges. Also treat other areas where bed bugs may be harboring. Do not use in patient rooms in hospitals and nursing homes for treatment of bed bugs.

CARPET BEETLES (IN RESIDENCES): Hold product 36" above floor and direct spray toward floor and lower walls treating at a rate of 10 seconds per 100 ft². Also apply as a crack & crevice treatment to cracks and crevices near the source of the infestation.

CLOTHES MOTHS: Locate source of infestation. Apply as a crack & crevice treatment to nearby cracks and crevices and perform a space treatment of the infested area at a rate of 5 to 10 seconds per 1,000 ft³.

To protect woolens and other keratin containing materials, brush clean then air out. Before treating entire article, treat a small hidden area of fabric to determine if staining will occur. Treat thoroughly by holding dispenser at least 18" from garment. Treated articles should be put into a darkened closet or other darkened storage such as cedar chests, storage drawers or sealable plastic fabric bags. For best protection, clean and treat inside of closets or storage areas by treating 1 second per 10 ft². before putting treated materials away. Treatment should be repeated every 6 months if needed. Dry clean treated clothes before wearing.

CARPET BEETLES, CIGARETTE BEETLES, CONFUSED FLOUR BEETLES, DRUG STORE BEETLES, GRAIN MITES, GRANARY WEEVILS, RED FLOUR BEETLES, RICE WEEVILS, AND SAWTOOTHED GRAIN BEETLES (FOR EXPOSED ADULT AND LARVAL STAGES): Apply as a crack & crevice treatment into cracks and crevices of pantries, cabinets, food processing and handling equipment and other places where insects harbor or as a space treatment at a rate of 20 seconds per 1,000 ft³. Also apply around cartons, containers and other areas where these insects tend to congregate. Contact as many insects as possible. Repeat treatment weekly or as insects appear. Infested stored products should be fumigated or treated by other effective methods using an approved product intended for this purpose.

ANGOUMOIS GRAIN MOTHS, CHOCOLATE MOTHS, INDIAN MEAL MOTHS, MEDITERRANEAN FLOUR MOTHS (FOR EXPOSED ADULT AND LARVAL STAGES): Apply as a space treatment at a rate of 5 to 10 seconds for each 1,000 ft³. Close all doors and windows. Direct into all parts of room, especially around stored product containers, pallets, and darkened areas. Keep area closed for 15 minutes following treatment. Open and ventilate before reoccupying. Repeat treatment weekly if necessary. Infested stored products should be fumigated or treated by other effective methods using an approved product intended for this purpose.

FLEAS IN BUILDINGS: Hold product 36" above floor and direct spray toward floor and lower walls treating at a rate of 10 seconds per 100 ft². Make sure that all floor, sofa and chair surfaces are contacted. Keep area closed for 15 minutes. Open and ventilate before reoccupying. Repeat treatment after 7 days if necessary.

TICKS: Holding container 36" above the floor, direct spray toward pet beds and resting quarters treating at a rate of 10 seconds per 100 ft². Also apply as a crack & crevice treatment into adjacent cracks and crevices such as behind baseboards and edges of carpet and floor covers. Also treat higher cracks such as upper door jams and window framing, behind pictures, and other areas where females may crawl to lay eggs. Remove pets before treatment. Allow treated surfaces to dry completely before allowing pets into treated areas. **Do not use this product to treat pets.**

IN HOSPITALS AND NURSING HOMES

Apply according to specific directions for pest(s) to be treated. Patients should be removed from room prior to treatment. Room should be ventilated for 2 hours after spraying. Do not return patients to room until after ventilation.

FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS

Apply according to specific directions for pest(s) to be treated. When applying as a space treatment in food handling areas, the areas of the operation being treated should be shut down. In food processing areas, all utensils, shelving, etc., where food will be handled should be covered or removed before treatment or thoroughly washed with an effective cleaning compound followed by a potable water rinse prior to use.

OUTDOOR TREATMENTS

GROUND APPLICATION (FLIES, GNATS, AND MOSQUITOES): Treat open areas near buildings and in campgrounds. Apply at a rate of 5 to 15 seconds per 1,000 ft³. Apply in swaths across area to be treated. Allow treatment to penetrate dense foliage. Best results are obtained when wind speed is 5 MPH or less.

FLIES, CLUSTER FLIES, CLOVER MITES, MUD DAUBERS, AND WASPS: Apply mist directly on insects and their nests from approximately 18". Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Disperse into hiding and breeding places contacting as many insects as possible.

May be used in the [Beacon™ Aerosol Dispenser][Dispenser][Mosquito Mister] [supplied by][sold by] [NCH Corporation].

To Install:

Follow the instructions included with the [dispenser][mister] to install aerosol can in [dispenser][mister].

To Use:

To [control][kill] ADULT MOSQUITOES, apply as a fine mist using the [Beacon Aerosol Dispenser][dispenser][mister] [supplied by][sold by] [NCH Corporation]. Hang [dispenser][mister] 5-6 feet above the ground, or place on a sturdy flat surface 5-6 feet above the ground. Direct nozzle to spray towards target area, and away from swimming pools, water bodies, or eating and cooking areas. For best results, direct fog downwind, and treat when wind velocity does not exceed 5 miles per hour. Application in the evening and/or early morning is recommended. Do not apply when people, pets, or food are near the dispenser and could potentially be contacted by the mist. One dispenser treats outdoor areas up to 300 ft². Multiple [dispensers][mistres] may be used to treat entire outdoor area to be protected, but do not use more than one dispenser for every 300 ft² of outdoor area. Use in open areas near buildings and in campgrounds. [Dispenser][Mister] can be set in one of two modes:

Remote Mode: Turn power switch to [Remote]. [Dispenser][Mister] will activate only when the remote button is pressed. Dispenser should be activated at least twice per day. For increased performance, dispenser can be activated four times per day. Do not remote activate the dispenser more than four times per day when in Remote mode.

Dusk/Dawn/Remote Mode: Turn power switch to [Dusk/Dawn/Remote]. [Dispenser][Mister] will activate automatically at dusk and dawn. [Dispenser][Mister] can also be activated by remote two additional times per day. Do not use the remote to activate the dispenser more than twice per day when in Dusk/Dawn/Remote mode.

Always place [dispenser][mister] and remote out of reach of children and pets.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool area away from heat or open flame.

PESTICIDE DISPOSAL: Waste resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Do not puncture or incinerate! Empty container by using the product in accordance with the label directions. Offer empty container for recycling, if available, or place in trash if allowed by state and local regulations. If container is partially full, contact your local solid waste agency for disposal instructions.

Contains no CFCs or other ozone depleting substances.
Federal regulations prohibit CFC propellants in aerosols.



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