

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 8, 2018

James McFadden, Ph.D. & Heather Friedli Wellmark International 1501 East Woodfield Road, Suite 200W Schaumburg, IL 60173

Subject: Amended Reregistration Label/Formulation Amendment Product Name: ELITE PYRETHRIN POWDER EPA Registration Number: 2724-627 Application Date: June 2, 2017, April 12, 2010, December 14, 2009 Decision Numbers: 530661, 412000, 410732

Dear Ms. Friedli and Dr. McFadden:

The amended label and Confidential Statements of Formulation (CSFs) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. The Agency, has also completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the Pyrethrins and PBO RED, and has concluded that your submission is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

NOTE: This product is <u>not</u> yet being reregistered under section 4(g) of FIFRA.

Please note that the record for this product currently contains the CSFs listed below. Any previously dated CSFs are superseded.

- Basic CSF, dated 07/14/2014
- Alternate CSF 1, dated 06/02/2017
- Alternate CSF 2, dated 06/02/2017
- Alternate CSF 3, dated 06/02/2017

A copy of your label stamped "Accepted" is enclosed. This labeling supersedes all previously accepted labeling. Products shipped after 12 months from the date of this amendment or the next printing of the label, whichever occurs first, must bear the new revised label. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling.

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

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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.

Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions about this letter, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,

Elizabeth Fertich Product Manager 4 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

Sublabel for Residential Use

ELITE PYRETHRIN POWDER

Alternate brand name: Zodiac Flea & Tick Powder for Dogs, Puppies, Cats & Kittens For use in residences, garages, attics, basements, sheds, porches, patios, residential lawns and gardens Controls: ants, cockroaches, silverfish, fleas, ticks, and others listed on side panels Controls fleas, ticks Contains pyrethrins Treats up to 400 square feet (16 oz) On residential lawns and gardens, provides control of insects on vegetables or ornamental plants Leaves no objectionable residues Acceptable for use to day of harvest on edible plants

ACTIVE INGREDIENTS:

Pyrethrins	0.1%
Piperonyl Butoxide*	
OTHER INGREDIENTS**:	
TOTAL	100.0%

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

** Contains Petroleum Distillates

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back/Side Panel for Precautionary Statements and First Aid

EPA Reg. No. 2724-627 EPA Est. No.

Net Contents: Lot Number: Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

02/08/2018

ACCEPTED

EPA Reg. No. 2724-627

Read entire label before each use.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS -CAUTION

Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes, or clothing. Wear long sleeved shirt, long pants, socks, and shoes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Do not use on puppies or kittens under 12 weeks. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals, or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID	
IF	 Immediately call a poison control center or doctor
SWALLOWED	 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	Take off contaminated clothing.
OR	 Rinse skin immediately with plenty of water for 15-20 minutes.
CLOTHING	• Call a poison control center or doctor for treatment advice.
pneumonia. Ha	n: Contains petroleum distillate. Vomiting may cause aspiration ave the product container or label with you when calling a poison control , or going for treatment. You may also contact 1-800-xxx-xxxx for ical treatment information.

ENVIRONMENTAL HAZARDS (FOR OUTDOOR USE ONLY)

This product is toxic to aquatic organisms, including fish and invertebrates. To protect the environment, do not allow pesticide to enter or run off 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 on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are foraging the treatment area.

USER SAFETY REQUIREMENTS

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. User should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

[Information in brackets is for Use with Flea Comb Attachment]

[New FleaComber provides the most convenient way to apply flea powder to your pet. The comb-in applicator allows you to work powder deep into your pet's coat for fast, effective relief without the mess. Before first use, remove seal below cap. Replace cap. (Cap is designed to loosen if overtightened).]

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. To apply on surfaces at the maximum rate, use 4 teaspoons ($\frac{2}{3}$ oz) to cover 9 sq ft (3' x 3')

USE RESTRICTIONS

Except when applying to pets, do not apply this product in a way that will contact adults, children, or pets either directly or through drift.

Except when applying to pets, do not allow adults, children or pets to enter the treated area until dusts have settled.

Do not apply to dogs or cats less than 12 weeks old.

For indoor residential use:

Only apply as a spot treatment to areas no greater than 3 ft by 3 feet per room.

Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

{For all labeled uses other than direct application to dogs and cats}

Application is prohibited directly into sewers or 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.

For outdoor residential use:

Applications with power duster equipment are prohibited

Do not apply more than 10 times per year.

Do not reapply within 3 days except under extreme pest pressure.

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

1. Treatment to soil or vegetation around structures,

2. Applications to lawns, turf and other vegetation,

3. Application to building foundation, up to a maximum height of three (3) feet.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.

Do not make outdoor applications during rain. Do not water the treated area to the point of runoff.

FOR DOGS AND CATS

To control fleas and ticks on dogs and cats, dust [comb] powder liberally over the entire body. Rub [Comb] dust into hair and around the feet, pads, and between the toes so that they are well treated. Take care not to put the powder in animal's eyes, nose, or mouth. Do not repeat treatment for one week. Dust pet bedding, kennel, and sleeping area regularly.

NON FOOD AREAS: To control crawling insects including ants, cockroaches, silverfish, fleas and ticks, apply a continuous visible film underneath and behind stoves, refrigerators and appliances. Treat on, around, and behind moldings, shelves, baseboards, pipe openings, cracks and crevices, and other areas where insects may hide. In animal quarters, distribute this product at the rate of 4 teaspoons ($\frac{2}{3}$ ounces) per 9 square feet of surface area per room. Repeat treatment as necessary.

(CONSUMER USE)

RESIDENTIAL LAWNS AND GARDENS: Treat only when insects are present and repeat as required to maintain control. Apply dust uniformly to upper and lower leaf surfaces.

CROP	TO CONTROL
Asparagus	Asparagus Beetles
Beans	Aphids, Leafhoppers, Mexican Bean Beetles
Broccoli, Cabbage, Brussel Sprouts,	Cabbage Loopers, Diamondback Moth
Cauliflower	Larvae, Flea Beetles, Harlequin Bugs,
	Imported Cabbageworms
Celery	Cabbage Loopers, Leaf Tiers
Lettuce	Cabbage Loopers, Diamondback Moth
	Larvae, Imported Cabbageworms
Potatoes	Aphids, Colorado Potato Beetles, Flea
	Beetles, Leafhoppers
Radishes	Aphids, Flea Beetles
Spinach	Aphids, Cabbage Loopers, Webworms
Tomatoes	Green Peach Aphids, Flea Beetles
Ornamentals: African Violets, Asters,	Aphids, Flea Beetles, Leafhoppers
Azaleas, Begonias, Camellias,	
Carnations, Chrysanthemums,	
Dahlias, Dogwood, Geraniums,	
Gladiolus, Marigolds, Roses, etc.	

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in original container in an area inaccessible to children and pets and away from heat and sunlight. Avoid exposure to moisture.

CONTAINER HANDLING : Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

This container is filled by weight, not by volume. You can be assured of proper weight even though some settling of contents normally occurs during transportation and handling.

In case of emergency or for product use information, call 1-800-950-4783(distributors may elect to use their own phone numbers) or visit our Web site zodiacpet.com .

To the extent consistent with applicable law, Seller makes no warranty, expressed or implied, concerning the use and handling of this product other than indicated on the label. To the extent consistent with applicable law, Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

Zodiac® is a registered trademark of Wellmark International.

Manufactured/Distributed By: Wellmark International 1501 East Woodfield Road 200W Schaumburg, Illinois 60173

Made in USA

Sub-label for Occupational Use

ELITE PYRETHRIN POWDER

Alternate brand name: Zodiac Flea & Tick Powder for Dogs, Puppies, Cats & Kittens For use in residences, institutions, food plants, warehouses, motels, theaters, schools, truck trailers, boxcars, hospitals, office buildings, and hotels Controls: ants, cockroaches, silverfish, fleas, ticks, and others listed on side panels Controls fleas, ticks Contains pyrethrins Treats up to 400 square feet (16 oz) On residential lawns and gardens, provides control of insects on vegetables or ornamental plants Leaves no objectionable residues Acceptable for use to day of harvest on edible plants

ACTIVE INGREDIENTS:

Pyrethrins	0.1%
Piperonyl Butoxide*	
OTHER INGREDIENTS**:	<u>98.9%</u>
TOTAL	100.0%

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

** Contains Petroleum Distillates

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back/Side Panel for Precautionary Statements and First Aid

EPA Reg. No. 2724-627 EPA Est. No.

Net Contents: Lot Number:

Read entire label before each use.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS -CAUTION

Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Do not use on puppies or kittens under 12 weeks. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals, or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

FIRST AID	
IF	 Immediately call a poison control center or doctor
SWALLOWED	 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	Take off contaminated clothing.
OR	 Rinse skin immediately with plenty of water for 15-20 minutes.
CLOTHING	 Call a poison control center or doctor for treatment advice.
pneumonia. Ha	n: Contains petroleum distillate. Vomiting may cause aspiration ave the product container or label with you when calling a poison control , or going for treatment. You may also contact 1-800-xxx-xxxx for ical treatment information.

FOR OCCUPATIONAL USE:

Personal Protective Equipment (PPE): Applicators and other handlers must wear the following: Long-sleeve shirt, Long pants, Shoes and socks

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions or 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 this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS (FOR OUTDOOR USE ONLY)

This product is toxic to aquatic organisms, including fish and invertebrates. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. This product may contaminate water through runoff. This product has a potential for runoff for several weeks after application. Poorly draining soils and soils with shallow water tables are more prone to produce runoff that contains this product.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are foraging the treatment area.

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-waters or rinsate.

[Information in brackets is for Use with Flea Comb Attachment]

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DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. To apply on surfaces at the maximum rate, use 4 teaspoons ($\frac{2}{3}$ oz) to cover 9 sq ft (3' x 3')

FOR OCCUPATIONAL USE: USE RESTRICTIONS

Only apply as a spot treatment to areas no greater than 3 ft by 3 feet per room. Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

To apply at the maximum rate, use 4 teaspoons ($\frac{2}{3}$ oz) to cover 9 sq ft (3' x 3')

ENTRY RESTRICTIONS:

Do not enter or allow others to enter until dusts have settled.

APPLICATION RESTRICTIONS:

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

(**Note:** If the product is to be applied to pets in an occupational use setting, the entry and application restriction text must instead read:)

[ENTRY RESTRICTIONS:

Except when applying to pets, do not enter or allow others to enter until dusts have settled.

APPLICATION RESTRICTIONS:

Except when applying to pets, do not apply this product in a way that will contact workers or other persons, either directly or through drift.]

Except when applying to pets, only protected handlers may be in the area during application. Application with power duster equipment is prohibited. Do not use in aircraft cabins.

{For all labeled uses other than for use directly on dogs and cats:}

Do not apply directly into sewers or drains, or to any area like a gutter where drainage to storm sewers, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

FOR DOGS AND CATS

To control fleas and ticks on dogs and cats, dust [comb] powder liberally over the entire body. Rub [Comb] dust into hair and around the feet, pads, and between the toes so that they are well treated. Take care not to put the powder in animal's eyes, nose, or mouth. Do not repeat treatment for one week. Dust pet bedding, kennel, and sleeping area regularly.

NON FOOD AREAS: Homes, institutions, hospitals, office buildings, warehouses, hotels, motels, theaters, schools, truck trailers, and railroad cars. Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. To control crawling insects including ants, cockroaches, silverfish, fleas and ticks, apply a continuous visible film underneath and behind stoves, refrigerators and appliances. Treat on, around, and behind moldings, shelves, baseboards, pipe openings, cracks and crevices, and other areas where insects may hide. In animal quarters, distribute this product at the rate of 4 teaspoons ($\frac{2}{3}$ ounces) per 9 square feet of surface area per room. Repeat treatment as necessary.

APPLICATIONS WITHIN FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS: Food processing plants and warehouses, bakeries, beverage plants, restaurants, supermarkets, meat and poultry plants, hotels, motels, hospitals, and schools: Limited to crack and crevice treatment only. Using a bulbous or similar duster, apply a small amount of material directly into cracks, crevices such as expansion joints between different elements of construction or between equipment bases and the floor, wall, voids, motor housing, junction boxes or switch boxes, conduits or hollow equipment legs where roaches, ants, silverfish, spiders, and crickets hide. Avoid depositing the product onto exposed surfaces or introducing the material into the air. Repeat treatment as necessary. Application of this product in the food areas of food handling establishments, other than as a crack and crevice treatment is not permitted.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in original container in an area inaccessible to children and pets and away from heat and sunlight. Avoid exposure to moisture.

CONTAINER HANDLING : Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain. This container is filled by weight, not by volume. You can be assured of proper weight even though some settling of contents normally occurs during transportation and handling.

In case of emergency or for product use information, call 1-800-950-4783 (distributors may elect to use their own phone numbers) or visit our Web site Zodiacpet.com.

To the extent consistent with applicable law, Seller makes no warranty, expressed or implied, concerning the use and handling of this product other than indicated on the label. To the extent consistent with applicable law, Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

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Made in USA