

2724-675

05/05/2011

1/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 5, 2011

Mr. James J. McFadden, Ph.D.  
Senior Regulatory Project Manager  
Wellmark International  
1501 East Woodfield Road, Suite 200 West  
Schaumburg, IL 60173-5417

**Subject: Amended Labeling; Addition of Use on Bed Bugs  
Premium Roach Spray, EPA Reg. No. 2724-675  
Your Submission Dated June 1, 2010**

Dear Mr. McFadden

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following label revision provision(s):

General Statement:

1. Delete all text throughout the subject label that have been marked with "~~strikethrough~~."
2. At the end of the 1<sup>st</sup> optional marketing statement, revise the words "aircraft (cargo areas only)" to read "aircraft (do not use in aircraft cabins)"

Efficacy Review comment(s):

3. Throughout the subject label, revise all instances of the word "control" to read "kill," since no efficacy (product performance) data has been submitted to support control claims for pyrethrins.
4. The submitted data support a "kills" claim. Residual and egg kill claims, and reduced egg hatch claims are also not supported, since the degree of egg hatch reduction is not likely to reduce bed bug populations.

Ingredient Statement section comment(s), middle of page 1 of 6:

5. Revise "Piperonyl Butoxide\* (CAS #51-03-6)" to read "Piperonyl Butoxide, Technical\* (CAS #51-03-6)"
6. Since this product is not being reregistered at this time, revise the existing 1<sup>st</sup> footnote in this section to read "\*Equivalent to 1.2% (butylcarbityl)(6-propylpiperonyl) ether and 0.3% related compounds."
7. Revise "**OTHER INGREDIENTS:**" to read "**OTHER INGREDIENTS:\*\***" and insert the following text as a 2<sup>nd</sup> footnote in this section: "\*\*\*Contains petroleum distillates."

Contents/Net Weight Statement section comment(s), bottom of page 1 of 6:

8. To facilitate inclusion of required language as specified in 40 CFR 156.10(d)(3) and Chapter 17, Section III of the Agency's Label Review Manual, the net contents must be expressed as pounds and ounces; therefore, revise "NET CONTENTS:" to read "NET CONTENTS: \_\_\_\_\_ ounces"

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s), top of page 2 of 6:

- 9. To facilitate inclusion of required label language from the REDs for pyrethrins and piperonyl butoxide (updated label tables for pyrethrins/piperonyl butoxide combination products), since the subject label includes both occupational and residential uses, and as required by Chapter 7, Section III.D. Table 7 and Chapter 10, Section VI.A.1. Table 1 of the Agency's Label Review Manual: revise all text at the top of page 2 of 6, immediately preceding the "First Aid" subsection, to include a required PPE subsection as follows:

**"PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS  
CAUTION**

**Contains petroleum distillates.** Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation. Wear long-sleeve shirt, long pants, socks and shoes.

**"Personal Protective Equipment (PPE)**

Applicators and other handlers must wear:

- Long-sleeve shirt and long pants, and
- Shoes plus socks.

**User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry."

Precautionary Statements, First Aid subsection comment(s), middle of page 2 of 6:

- 10. For labeling consistency, revise the listing of "If in eyes:" to read "IF IN EYES:"
- 11. Revise the existing "Note to Physician:" subsection to read "Note to Physician: Contains petroleum distillates. Vomiting may cause aspiration pneumonia."
- 12. Revise the 2<sup>nd</sup> sentence of the **HOT LINE NUMBER** statement to read "For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx." It is important to note that the "1-800-xxx-xxxx" phone number listed in this revised 2<sup>nd</sup> sentence should be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

Precautionary Statements, Environmental Hazards Statement subsection comment(s), bottom of page 2 of 6:

- 13. To facilitate inclusion of required label language from the revised RED for tetramethrin (updated label table dated April 2010), revise this section to read:

"This pesticide is extremely toxic to aquatic organisms, including fish and aquatic invertebrates. Do not contaminate water when disposing of equipment, wash-water, or rinsate. See Directions for Use for additional precautions and requirements."

**[For indoor commercial, industrial, or institutional products packaged in containers equal to or greater than 5 gallons or 50 pounds, add the following statement:**

"Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA."

Precautionary Statements, Physical or Chemical Hazards Statement subsection comment(s), top of page 3 of 6:

- 14. Within the existing 2<sup>nd</sup> sentence of this section, replace the misspelled word "heator" with the words "heat or."

Directions for Use section comment(s), bottom of page 3 of 6:

- 15. Revise the line of text starting with "READ THE ENTIRE LABEL ..." to read "READ THE ENTIRE LABEL PRIOR TO USE. USE STRICTLY IN ACCORDANCE WITH ALL USE RESTRICTIONS AND DIRECTIONS."

Directions for Use, "GENERAL PRECAUTIONS AND RESTRICTIONS" subsection comment(s), bottom of page 3 of 6:

16. To facilitate inclusion of required label language from the REDs for pyrethrins and piperonyl butoxide (updated combination label table for pyrethrins/piperonyl butoxide products), and from the revised RED for tetramethrin (updated label table dated April 2010), revise the existing "GENERAL PRECAUTIONS AND RESTRICTIONS" subsection heading to read:

USE RESTRICTIONS
<ul style="list-style-type: none"> <li>• Do not contaminate food or feedstuffs.</li> <li>• Not for use in food or feed areas of food handling and processing facilities.</li> <li>• Do not use in aircraft cabins.</li> <li>• Do not apply to classrooms when in use.</li> <li>• Do not apply to patient rooms in hospitals and nursing homes while occupied.</li> <li>• Do not use this product directly on domestic (companion) animals (dogs, cats, puppies or kittens).</li> <li>• Do not enter or allow others to enter until sprays have dispersed, and the area has been thoroughly ventilated. 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 treated area during application.</li> <li>• Do not apply when food is present. Do not use in food areas of food handling establishments, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.</li> <li>• When used as a residential general outdoor surface spray: 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; and (2) Applications to building foundations, up to a maximum height of 3 feet. Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.</li> <li>• Do not apply this product directly to sewers or drains, or to any area like a gutter where drainage to storm sewers, water bodies, or aquatic habitat can occur, except as directed by this label.</li> <li>• Remove pets, birds and cover fish aquariums before spraying.</li> </ul>

Directions for Use, "GENERAL INFORMATION:" subsection comment(s), middle of page 4 of 6:

17. Revise the subsection to read "USE INFORMATION: Premium Roach Spray provides effective control of listed pests in and on buildings, structures and their immediate surroundings, and on modes of transport. Permitted areas of use: (apartment buildings, homes, hospitals, and the non-food/feed areas of hotels, industrial buildings, laboratories, mausoleums, motels, private residences, nursing homes, schools, stores, utilities warehouses, and in non-food areas of [restaurants, food manufacturing, processing, and servicing establishments], and on: vessels, rail cars, aircraft (do not use in aircraft cabins), buses, trucks, and trailers.)"

Directions for Use, INDOORS Subsection-Specific comment(s), page 5 of 6:

18. Revise the paragraph starting with "**Repeat treatments to infested areas ...**" to read "**Do not re-apply more often than every 14 days** to kill Cockroaches, Ants, Crickets, Earwigs, Firebrats, Fleas, Silverfish, Spiders, and Sowbugs. Apply as a crack & crevice or spot treatment to areas where these pests crawl and hide, especially on hidden surfaces around sinks and storage areas, along and behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, and on the underside of shelves, drawers, and bookcases."

19. Revise the "Fleas in Buildings:" subsection to read "Remove and destroy pet's old bedding and replace with clean fresh bedding after treatment of pet areas. Apply as a crack & crevice treatment to infested areas such as pet beds, sleeping quarters of pets, around base boards, windows and door frames, local areas of floors (under the edges of rugs and floor coverings), and between/under cushions of upholstered furniture. Do not allow pets to reoccupy treated areas until treated surfaces have thoroughly dried. **DO NOT USE THIS PRODUCT DIRECTLY ON DOMESTIC/COMPANION ANIMALS (DOGS, CATS, PUPPIES OR KITTENS).** Treat dogs and cats with a flea and tick control product before allowing them to re-enter the treated area."

20. Within the 1<sup>st</sup> sentence of the "Spiders:" subsection, insert the words "as a crack & crevice or spot treatment" immediately following the word "Apply."

21. Revise the "Earwigs, Mole Crickets, ..." subsection to read "Apply as a crack & crevice or spot treatment around doors and windows, along and behind baseboards, and in storage areas where these pests are found."

22. Within the 1<sup>st</sup> sentence of the "Carpet Beetles (Black, Furniture and Varied):" subsection, replace the word "Spray" with the words "Apply as a crack & crevice or spot treatment" immediately following the word "Apply."

Directions for Use, "Bed Bugs" subsection comment(s), bottom of page 5 of 6:

23. Revise the existing "Bed Bugs" subsection to read:

"Bed Bugs: Thoroughly inspect area of suspected bed bug infestation, and note potential harborage sites or actual infestations. Remove and/or pick up clothing and other obstacles that may prevent thorough inspection or treatment. Remove and sanitize infested bedding (pillows and linens), clothing, or other items.

Apply [brand name] on mattresses as a spot treatment to mattress seams, edges, and tufts of bed only. Do not use [brand name] directly on mattresses, pillows, bed linens or clothes. Do not saturate the mattress; and do not treat entire surface area of mattress. Allow mattress to dry thoroughly before replacing pillows and/or bed linens.

Bed bugs may also harbor in areas of the room away from the bed. Apply [brand name] as a crack & crevice or spot application where evidence of bed bugs occurs. This includes bed frames, box springs, inside empty drawers and clothes closets, night stands and other furniture in the room, carpet edges, high and low wall moldings (such as floor molding or window casings), wall voids, behind wall hangings and mirrors, wallpaper edges and popcorn ceilings. Remove all clothes and other articles from dressers or closets before application. Take bed apart. Treat joints and channels if hollow, such as square or round tubing, and see that interior framework is treated. Apply [brand name] as a surface application to carpeting, drapes, and flooring at the rate of 16 ounces per 500 ft<sup>2</sup>. Allow all treated areas to dry thoroughly before use.

[Brand name] is not recommended for use as sole protection against bed bugs. If evidence of bed bugs is found in/on mattresses, use products approved for this use."

Directions for Use, OUTDOORS/PESTS ON OUTSIDE SURFACES OF BUILDINGS section comment(s), page 6 of 6:

24. Within the 1<sup>st</sup> sentence, replace the words "For control of building infestation due to" with the words "To kill"

25. Insert the following text immediately following the 2<sup>nd</sup> sentence: "For ants, spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris."

26. Within the 3<sup>rd</sup> sentence, insert the word "listed" immediately preceding the word "insects."

27. Revise the 5<sup>th</sup> sentence to read "Do not reapply more than every 7 days."

Storage and Disposal Statement section comment(s), page 6 of 6:

28. Revise the "**STORAGE:**" subsection to read "**PESTICIDE STORAGE:** Do not store near heat or open flame. Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals."

29. To facilitate inclusion of language from PR Notice 2007-4, revise the "**DISPOSAL:**" subsection to read "**CONTAINER DISPOSAL:** Do Not Puncture or Incinerate! Nonrefillable container. Do not reuse or refill this container. **If empty:** Offer for recycling, if available. **If partially filled:** Call your local solid waste agency for disposal instructions."

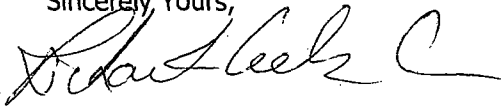
Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists 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 be 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 EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

5/11

A copy of your label stamped "Accepted with Comments" is enclosed for your records along with hard copies of the HED and efficacy reviews completed for this product. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely Yours,



Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7504P)

*Enclosures:*

- Copy of label stamped "Accepted with Comments"*
- Copy of HED review completed for etofenprox, dated March 25, 2011*
- Copy of HED review completed for pyrethrins, dated March 28, 2011*
- Copy of HED review completed for piperonyl butoxide, dated March 31, 2011*
- Copy of HED review completed for tetramethrin, dated March 31, 2011*
- Copy of efficacy review, dated October 20, 2010*

# PREMIUM ROACH SPRAY

For use in homes, apartment buildings, and the non-food/feed areas of hotels, stores, warehouses, office buildings, schools, nursing homes, hospitals, industrial buildings, vessels, rail cars, trucks, trailers, and aircraft (cargo areas only)

Contains Synergized Etofenprox, Pyrethrin and Tetramethrin

Provides Quick Killing Action ~~and Residual Control~~

Economical Do-It-Yourself Pest Control

Use Indoors and Outdoors

Flushes Roaches from Where They Hide

Kills Fleas - Roaches - Ants

Kills Bed Bugs ~~and Reduces Egg Hatch~~

Kills on Contact - Kills Fast

Kills Hidden Bugs

~~Kills Bugs You See and Even the Ones You Don't See~~

A broad spectrum insecticide highly effective against Ants, Carpet Beetles, Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Flour Beetles, Grain Beetles, Pillbugs, Silverfish, Sowbugs, Spiders, ~~and many other crawling insects~~

No Oily Residue - Low Odor

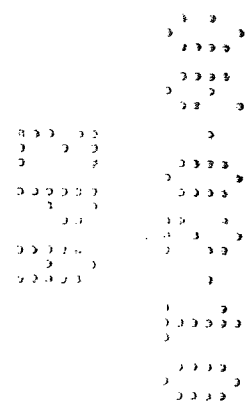
### ACTIVE INGREDIENTS:

Pyrethrins (CAS #8003-34-7).....	0.15%
Tetramethrin (CAS #7696-12-0).....	0.50%
Etofenprox (CAS #80844-07-1).....	1.00%
Piperonyl Butoxide* (CAS #51-03-6).....	1.50%

<b>OTHER INGREDIENTS:</b> .....	<b>96.85%</b>
Total	100.00%

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

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
See Side Panel For Additional Precautions



NET CONTENTS:

EPA REG. NO. 2724-675  
EPA EST. NO.

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

*May 5, 2011*

Under the Federal Insecticide, Fungicide  
and Rodenticide Act, As amended, for the  
pesticide Registered under EPA Reg. No:

2724-675

**PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS & DOMESTIC ANIMALS  
CAUTION**

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation.

~~TEXT FOR OCCUPATIONAL USE LABELS ONLY~~

Personal Protective Equipment (PPE):

Applicators must wear

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

**User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

<b>FIRST AID</b>	
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Immediately call a poison control center or doctor.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give <b>any</b> liquid to the person.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
Note to Physician: Vomiting may cause aspiration pneumonia.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also call 1-800-xxx-xxxx for emergency medical treatment information.	

~~FOR OCCUPATIONAL USE LABELS~~

**ENVIRONMENTAL HAZARDS**

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 actively visiting the treatment area. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

~~FOR CONSUMER USE LABELS~~  
~~ENVIRONMENTAL HAZARDS~~

~~This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to or near water. Drift and runoff may be hazardous to fish in water adjacent to treated areas. See Directions for Use for additional precautions and requirements. 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 actively visiting the treatment area.~~

**PHYSICAL OR CHEMICAL HAZARDS**

Contents under pressure. Do not use or store near heater open flame. 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.

**READ THE ENTIRE LABEL PRIOR TO USE. USE STRICTLY IN ACCORDANCE WITH ALL LABEL PRECAUTIONS AND DIRECTIONS.**

~~FOR OCCUPATIONAL USE LABELS~~

~~GENERAL PRECAUTIONS AND RESTRICTIONS~~

~~Do not enter or allow others to enter until sprays have dried.~~

~~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.~~

~~Do not water the treated area to the point of runoff.~~

~~Do not use in aircraft cabins except in compliance with PR Notice 06-3.~~

~~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 building foundations, up to a maximum height of 3 feet~~

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

To apply at the maximum application rate, spray for 24 seconds to cover an area of 5' X 10' (50 sq ft)



~~FOR CONSUMER USE LABELS--~~

~~GENERAL PRECAUTIONS AND RESTRICTIONS--~~

~~Do not make applications during rain.~~

~~Do not wet articles to point of runoff or drip.~~

~~Do not use treated article until spray has dried.~~

~~Do not allow adults, children, or pets to enter the treated area until sprays have dried.~~

~~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.~~

~~Do not water the treated area to the point of runoff.~~

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

~~3) Treatment to soil or vegetation around structures;~~

~~4) Applications to building foundations, up to a maximum height of 3 feet~~

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

~~To apply at the maximum application rate, spray for 24 seconds to cover an area of 5' X 10' (50 sq ft)~~

~~GENERAL INFORMATION: Etofenprox Premium Roach Spray provides effective control of pests in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include, areas such as: apartment buildings, homes, hospitals, and the non-food/feed areas of hotels, industrial buildings, laboratories, mausoleums, motels, nursing homes, private residences, schools, stores, utilities warehouses, and in non-food areas of restaurants, food manufacturing, processing, and servicing establishments, and on: vessels, rail cars, aircraft (cargo areas only), buses, trucks and trailers.~~

~~INDOORS~~

~~Note: Do not apply to classrooms when in use. Do not apply to patient rooms in hospitals and nursing homes while occupied. For use in the non-food and non-feed areas of food and feed handling establishments. Non food and non feed areas of food and feed establishments are areas such as garbage rooms, lavatories, floor drains (to sewer entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning and bottling). Do not use in food or feed areas of food or feed handling establishments, restaurants or other areas where food or feed is commercially prepared or processed. Do not use in serving areas while food is exposed or the facility is in operation. Serving areas are areas where prepared foods are served, such as dining rooms but excluding areas where foods may be prepared or held.~~

~~Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. Remove pets, birds, and cover fish aquariums before spraying. Hold container upright with nozzle away from you. Press valve down and spray as directed. Spray surface until slightly wet (at a rate of 2 seconds to treat approximately 1 linear foot of baseboard area).~~

**Repeat treatments to infested areas as necessary at intervals of 14 days or greater.**

Cockroaches, Ants, Crickets, Earwigs, Firebrats, Fleas, Silverfish, Spiders, and Sowbugs: Apply as a spot or crack and crevice treatment. Apply thoroughly to areas where these pests crawl and hide, especially in cracks and crevices, and hidden surfaces 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 in similar areas.

Ants: Spray around ant trails, doors and windows and other places where ants enter premises.

~~Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray on and around debris.~~

Fleas in Buildings: Apply to infested areas such as pet beds and resting quarters, nearby cracks and crevices, under the edges of rugs and floor coverings, between and under cushions of upholstered furniture and other areas where these pests may be present. Old bedding of pets should be removed and replaced with clean fresh bedding after treatment of pet areas. **DO NOT APPLY DIRECTLY ON ANIMALS.**

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.

Earwigs, Mole Crickets, Pillbugs, and Sowbugs: 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.

Pantry Pests - Exposed Stages of Sawtoothed Grain Beetles, Flour Beetles (Red and Confused), and Cigarette Beetles: Treat exposed stages. Remove all foodstuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow spray to dry prior to replacement of shelf paper, food and utensils.

Carpet Beetles (Black, Furniture and Varied): Spray on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Bed Bugs – Thoroughly inspect area of suspected bed bug infestation and note potential harborage sites or actual infestations. Remove and or pick up clothing and other obstacles that may prevent thorough inspection or treatment. Remove and sanitize infested bedding, clothing or other items.

Apply [brand name] to areas where bed bugs harborage. Apply thoroughly as a spot, crack and crevice or surface application. Focus applications to harborage sites such as behind dressers, cove base, under carpets and furniture, inside and on box springs, under beds, behind mirrors and pictures and other locations where bed bugs harbor.

Apply as a surface application to carpeting, drapes and flooring at the rate of 16 ounces per 500 ft<sup>2</sup>. [Brand name] may be applied directly to mattresses, focus applications on seams and folds. Allow mattress to dry thoroughly before replacing bedding.

u/n

## OUTDOORS

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Spray with wind if breeze is blowing.

**PESTS ON OUTSIDE SURFACES OF BUILDINGS** - For control of building infestation due to Ants, Crickets, Earwigs, and Sowbugs (Pillbugs): Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. Apply as a ~~residual~~ spray 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.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. (Include for occupational use only)

**STORAGE:** Do not store near heat or open flame. Store in cool dry area away from children.

**DISPOSAL:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Seller warrants that this product conforms to the chemical specifications expressed on the 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 for 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.

Wellmark International  
1501 East Woodfield Road 200W  
Schaumburg, Illinois 60173  
[URL]  
Made in USA