



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 3, 2019

Heather Friedli
Regulatory Affairs Specialist
Wellmark International
1501 E. Woodfield Rd., Suite 200W
Schaumburg, IL 60173

Subject: PRIA Label and CSF Amendment – Adding bag-on-valve language and outdoor uses to the label, in addition to revising the basic CSF, alternate CSF #1, and adding an alternate CSF #2.
Product Name: RF2177 WB Carpet RTU
EPA Registration Number: 2724-822
Application Date: February 11, 2019
Decision Number: 548652

Dear Ms. Friedli:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are 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.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. 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 18 months from the date of this letter. After 18 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.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 02/11/2019
- Alternate CSF 1 dated 02/11/2019
- Alternate CSF 2 dated 02/11/2019

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.

Your release for shipment of the product 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, please contact Jennifer Gaines at 703-305-5967 or via email at gaines.jennifer@epa.gov.

Enclosure

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is written in a cursive style with a large initial "E".

Elizabeth Fertich
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

07/03/2019

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 2724-822

- { } Text in braces appears as notes to the reviewer
[] Text in brackets is optional
() Text in parentheses included on label

RF2177 WB CARPET RTU

{Optional Marketing Statement(s) - may appear on front or other label panels}

[water-based][formula]
[with (contains) PRECOR®(vIGRen®) (*Infestop™)(*InfestStop™)(an) (Insect Growth Regulator)]
[with (contains) PRECOR®(vIGRen®)(*Infestop™)(*InfestStop™)(an)(Insect Growth Regulator) plus Etofenprox, an adulticide]
RTU (Ready to Use) Long Lasting For Fleas
[Step X - Indoor] Formula With Etofenprox Effective
[Step X - Pet Protection Program]
Part of the [brand] Home Defense System
[Step 1 –] Protect your pet with [brand] Spot On® treatment
[Step 2 –] Protect your home with [brand][home spray][carpet spray][to kill pests and help keep them from coming back]
[Step 3 –] Kill pests where they live with [brand][yard spray]
[Part of [AAA][Triple A][Protection][Defense] (for Adams™ Brand)]
[Plus Insect Growth Regulator]
[7 month[s]][30 weeks][210 days] protection]
[Provides][up to] 7 months of [protection/control][indoors]
[7 months of protection against fleas, flea eggs, and flea larvae]
[Protects for [7 months][30 weeks][210 days]
[Up to 7 month[s] control]
[Protects for [over][more than][greater than] half a year]
[Kills fleas plus kills flea larvae]
[Kills [visible] [adult] fleas and kills flea larvae [for up to 7 months]
[Stops [new][pre-adult][hatching] fleas from developing.]
[Stops hatching eggs from developing into adult fleas for [7 months][30 weeks][210 days].
[Plus kills [flea eggs][&][and][larvae] to prevent future infestations for 7 months [30 weeks][210 days]
[Dual action – kills and prevents [new infestations]
[Dual][action/Control]: Kills over [insert number][listed] pests* and prevents new infestations *as listed
Works 2 ways: Kills over [insert number][listed] pests* and prevents new infestations *as listed
[Can be used directly on bugs and in places where they hide and breed]
[Kills pests and helps keep them from coming back]
[Prevents insect infestations]
[Contains [*Infestop™][*InfestStop™][an Insect Growth Regulator] [an IGR] [that][which] to kill(s) flea eggs and larvae] [to help prevent] [reinfestation][future infestations] for up to 7 months]
[Contains [*Infestop™][*InfestStop™][an Insect Growth Regulator [IGR] [that][which] to kill(s) flea eggs and larvae] so you can keep your [home] free from reinfestation [future infestations] for up to 7 months]
[Smarter Pet Care (vs. using a spray without [*Infestop™][*InfestStop™][IGR]) and does not kill flea eggs and flea larvae]
[Protect your house [home] from flea [insect] infestations]
[Helps] Prevent(s) reinfestation [future infestations]
[An important step in breaking the flea life cycle]
[Non-aerosol [delivery system] [bottle][container] [spray]
[Non-aerosol [insert listed bug] killer]
[The protection you need from [the] [a] brand you trust]
[Controls reinfestation for 7 months [30 weeks][210 days] from pre-adult [hatching] fleas.]
[Prevents hatching fleas from becoming full grown.]
[Kills [controls][pre-adult][hatching] fleas [before they grow up to bite].
[Kills [present] [today's] fleas and prevents [new] [tomorrow's] fleas [from growing up to bite].
[Kills flea eggs and flea larvae before they [grow up into][develop into][become] biting, breeding adults]
[Effectively kills [controls] fleas by preventing their development into adults.]

[Effectively breaks the flea life cycle]
[Powerful results when you need it]
[Powerful results guaranteed(*) or your money back (or with *or your money back)]
[Prevents flea build-up]

*(S)-Methoprene (must occur on same panel wherever InfestStop™ is used)

[Begins killing fleas in 5 minutes.]
[Long-lasting for Fleas]
[Targeted spray pattern [provides good coverage][covers hard to reach cracks and crevices]
[One treatment works against pre-adult fleas for 210 days [30 weeks][7 months].
[Residual action keeps working for 210 days [30 weeks][7 months] against pre-adult fleas.
[No Mercy][Actively] Kills [No][crawling] [flying] [insects] [adult] [fleas], [ticks], [cockroaches], [silverfish],
[earwigs], [ants* (except carpenter, harvester, pharaoh and fire ants)], [scorpions], [spiders], [crickets],
[pillbugs], sowbugs [carpet beetles], [confused flour beetles],[centipedes], [darkling beetles],
[dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes],
[mosquitoes], [moths], [red flour beetles], [saw-toothed grain beetles], [wasps], [bed bugs] and [&][other
insects] [on contact].
Kills By Contact
[Kills [insert listed pest(s)] by contact]
[listed insect] Contact Killer]
[Kills [and prevents] common household insects [bugs][pests]
[Kills flying and crawling insects]
[Kills mosquitoes that may transmit [West Nile Virus],[Chikungunya][and/or] [Dengue Fever] [disease]
[Protects [your home] from/against mosquitoes that may transmit [West Nile Virus],[Chikungunya] [and/or]
[Dengue Fever] [disease]
[Protects [your home] from/against disease carrying mosquitoes]
[Take back your [home] [house] from [insert listed pest(s)]
[A [safeguard][shield][defense] against [adult] [fleas], [flea eggs], [flea larvae], [ticks], [bed bugs],
[cockroaches], [silverfish], [earwigs], [ants* (except carpenter, harvester, pharaoh and fire ants)],
[scorpions], [spiders], [crickets], [pillbugs], sowbugs [carpet beetles], [confused flour beetles],[
[centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths],
[lesser grain borers], [millipedes], [mosquitoes], [moths], [red flour beetles], [saw-toothed grain beetles],
[wasps], [bed bugs] for your home]
[Kills bed bugs [and nymphs] for up to 14 days]
[Easy to Use]
[Non-Staining] [and/&] [Fragrance-Free]
[No Lingering [chemical] Odor]
[No unpleasant odor[s]]
[Effective long term control for Fleas]
[Controls stages of fleas that don't look like fleas]
[Use on [For] [carpets], [rugs], [upholstery] [&] and [pet bedding]
[Best if used with][Works well if used with][Use with] other [Brand][flea control] products]
Value Pack [\$ off] [Save \$][now][guaranteed to work or your money back]
[Non-aerosol] Package is [100%] Recyclable]
Use on [carpets] [rugs] [upholstery] [drapes] [curtains] [furniture] [floors] [luggage] [pet bedding] [pet
quarters] [box springs] [&] [mattresses]
For use in [homes] [garages] [attics] [apartments] [hotels] [bedrooms]
[For] Apartment and City Living]
[Treats up to [XXX] square feet]
[Kills [insert listed pests] & [insert listed pest]
[Powerful results without the mess [of] [powders] [or foggers]
[Works] [Targeted results] fast for fleas only!]
Effective long-term control for fleas]
[Use to kill and prevent bed bugs [for up to] [14 days] [2 weeks]

[Kills Ticks, Kills American Dog Ticks, Brown Dog Ticks and Lone Star Ticks]
[Targeted] [Ready-to-Use] Spray
[Efficient Ready-to-Use [Spray] [Formula]
[Tough on pests, easy on your [home] [furniture] [carpets] [upholstery]
[Tough on pests, not on your [home] [furniture] [carpets] [upholstery]
[With AMDRO, it's Game Over for [insert listed pest(s)]]
[Kills pests that pets can bring inside]
[Kills/Proven protection against] invading listed insects that may enter from neighboring [units/homes]]
[Proven [results/to work] the [first/1st] time [Guaranteed or your money back]]
[Guaranteed* (*[Brand] Satisfaction Guarantee: If, after following instructions, you are not satisfied with
[product results, send your name, address, and proof of purchase (original dated receipt) to: [Brand]
[Refund, [registrant address]]
[Non-Staining [and] Fragrance-Free]
[Neutral/No Lingering/No Unpleasant] odor]
[Dries fast]

To Learn How to Apply, Scan the QR Code [with QR Code] [visit] at adamsfleacontrol.com, vet-kem.com,
biospotactivecare.com or amdoro.com

ICONS for Flies, Ticks, Mosquitoes, other listed pests



Additional marketing claims for BOV packaging

[Continuous spray]
[Even and controlled spraying pattern for optimal results]
[Twist [to] Lock {/ / &} Unlock (with illustration)]

[No pumping action needed]
[Low spray noise]
[Sprays at any angle for even application]
[Can be used at all angles]
[360° [spray] (with illustration)]

[Front panel]

ACTIVE INGREDIENTS:

(S)-Methoprene	0.01%
Etofenprox	0.50%
Piperonyl Butoxide*:	2.00%
OTHER INGREDIENTS:	<u>97.49%</u>
Total	100.00%

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

KEEP OUT OF REACH OF CHILDREN

See [Back][side] [Panel(s)][label] for Additional Precautionary Statements

EPA Reg. No. 2724-822

EPA Est. No.

Batch/Lot No.

Net Contents: 1 pt 8 oz (24 fluid ounces) (for BOV) oz/gm

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Wear long-sleeved shirt and long pants, socks, shoes and gloves.

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 has the potential to 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.

USER SAFETY RECOMMENDATIONS:

User should wash hands with plenty of soap and water 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.

REQUIRED FOR BOV PACKAGING:

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

**READ ENTIRE LABEL BEFORE EACH USE.
DO NOT SPRAY ON PETS OR HUMANS.**

[Brand Name] is formulated to stop hatching eggs from developing into adult fleas and kill pre-adult fleas (larvae) before they grow up to bite. [RF2177 WB Carpet RTU [Brand name] contains a unique combination of ingredients that kills pre-adult fleas before they grow up to bite and kills adult fleas.] It reaches [and kills] fleas hidden in carpets, rugs, upholstery, and pet bedding. It safeguards [protects] your home from flea build-up, while protecting your pets and family from bites. Use in homes, garages, attics and apartments.]

RF2177 WB Carpet RTU [Brand name] kills adult and pre-adult fleas. It prevents pre-adult fleas from hatching into adult biting fleas for 7 months [30 weeks][210 days]. One treatment gives continuous protection against pre-adult fleas for 7 months [210 days][30 weeks].

RF2177 WB Carpet RTU [Brand name] [kills fleas], [ticks], [cockroaches], [silverfish], [earwigs], [ants* (except carpenter, harvester, pharaoh and fire ants)], [scorpions], [spiders], [crickets], [pillbugs], [sowbugs] [carpet beetles], [confused flour beetles], [centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes], [mosquitoes], [moths], [red flour beetles], [saw-toothed grain beetles], [wasps], and [&][other listed insects] [on contact]. This product is designed for use on all fabrics and carpeting; however, some natural fibers [such as wool] and synthetics may be adversely affected by any liquid product - always test a hidden area prior to use. [Lighter colored carpets may show some soiling after treatment. To help avoid soiling carpets, allow product to dry completely before walking on treated areas.]

{alternate paragraph}

[Brand name] kills [ants* (except carpenter, harvester, pharaoh and fire ants)], [cockroaches], [fleas], [bed bugs], [ticks], [silverfish], [earwigs], [scorpions], [spiders], [crickets], [pillbugs], [sowbugs] [carpet beetles], [confused flour beetles], [centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes], [mosquitoes], [moths], [red flour beetles], [saw-toothed grain beetles], [wasps], and [&][other listed insects] [on contact]. This product is designed for use on all fabrics and carpeting; however, some natural fibers [such as wool] and synthetics may be adversely affected by any liquid product - always test a hidden area prior to use. [Lighter colored carpets may show some soiling after treatment. To help avoid soiling carpets, allow product to dry completely before walking on treated areas.]

[To protect your pet against fleas outdoors, use a [brand name] flea or flea and tick collar, [brand name] pet dust [powder], [brand name] pet spray, [brand name] pet sponge-on, [brand name] pet topical, [brand name] pet shampoo, or other appropriate product registered for on-animal use.]

DIRECTIONS FOR USE

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

Shake well before using.

[For residential use: non-food areas of apartments, condominiums, townhomes, bedrooms, bathrooms, living rooms, kitchens, playrooms, pet sleeping quarters decks and storage areas.]

USE RESTRICTIONS

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 contaminate food and foodstuffs. Do not use in the edible product areas of food processing plants, restaurants, or other areas where food is commercially prepared, processed, stored, or served.

Do not use in aircraft cabins.

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

Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.

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.

Do not make applications during rain.

Do not wet plants to the point of runoff or drip.

Do not water the treated area to the point of run-off.

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) 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.

[INDOOR]

[Where To [Use] / [Apply]:

[1] Target insects directly wherever possible.

[Also / And]:

[2] Along baseboards, floors and upholstery. [3] In cabinets and drawers. [4] Behind and under appliances. [5] Around sinks and plumbing. [with illustration]

Gently rotate top to lock or unlock. [with illustration] {as appropriate to packaging; e.g. bag-on-valve aerosol}

General Surface, Spot or Crack & Crevice Treatment

Apply as a crack and crevice treatment where pests reside, especially along baseboards, floors, around sinks, windows and doors, and in hidden spaces in cabinets, drawers, closets, behind and under refrigerators, stoves, shelving, furniture and similar areas. Hold [can/bottle] {BOV/trigger spray} at any angle and spray from a distance of 12 inches. Spray about 2 seconds per linear foot.

Fleas: [Use RF2177 WB Carpet RTU [Brand name] in homes, [garages],[attics], [apartments] and [hotels].]

One bottle/can will treat a surface area equivalent to [350/230 sq. ft.] approximately [3/2] [10' X 11.5'] rooms.

A fine spray applied uniformly is all that is necessary to kill fleas. Do not [wet]/[saturate] furniture and carpeting. Remove birds and cover aquariums before spraying. For maximum effectiveness, treat entire carpeted area. Treat carpets, rugs, drapes and all surfaces of upholstered furniture. Remove old pet bedding and replace with clean fresh bedding after treatment of pet area. Vacate treated areas and do not return for at least one hour. Reapply every 2 weeks if necessary.

Bed Bugs: Thoroughly inspect areas of suspected bed bug infestation and note potential or actual sites where bed bugs hide. [(For professional use products) -Instruct residents to] Remove or pick up clothing and other obstacles that prevent thorough inspection or treatment. Remove and sanitize infested bedding, clothing, or other items. **Do not apply to bedding. Wash bedding and dry using medium to high heat to kill bed bugs.**

To kill [ants* (except carpenter, harvester, pharaoh and fire ants)], [cockroaches], [silverfish], [earwigs],

[scorpions], [spiders], [crickets], [pillbugs], sowbugs] [carpet beetles], [confused flour beetles], [centipedes], [darkling beetles], [dermestids], [firebrats], [flies], [fruit flies], [gnats], [Indian meal moths], [lesser grain borers], [millipedes], [mosquitoes], [moths], [red flour beetles], [saw-toothed grain beetles], [wasps], and [&][other listed insects], apply directly to pests

Apply [brand name] to areas where bed bugs live, especially hidden sites. Apply thoroughly as a spot, crack and crevice, or surface application. Focus applications to hidden sites including 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 hide.

Apply as a surface application to carpeting, drapes, and flooring at the rate of ¼ fl oz/3.6 ft² (about 8 pumps/4 seconds) [Pump spray/BOV]. Apply [Brand name] directly to mattresses, **do not saturate the mattress**, focus applications on seams and folds. Allow mattress to dry thoroughly before replacing bedding.

OUTDOOR [PERIMETER]:

Spot Treatments

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm.

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

Pests on Outside Surfaces of Buildings: For control of building infestation due to Ants*(except carpenter, harvester, pharaoh and fire ants), Crickets, Millipedes, Centipedes, Sowbugs (Pillbugs) and Beetles: Spray foundation of building where insects are active and may find entrance, up to a height of 2 to 3 feet. Hold can 2 to 3 feet from surface to be treated and spray to slightly moisten surface. Apply as a residual spray to outside surface of buildings where insects tend to congregate. Spray areas include screens, window frames, eaves, porches, patios, garages and refuse dumps.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: (FOR BOV PACKAGING: Do not store near heat or open flame.) Store in original container away from children and pets. Protect from freezing or high temperatures.
Pesticide Disposal and Container Handling (for liquid with pump ready-to-use spray bottle): 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.
Pesticide Disposal and Container Handling (for BOV packaging): 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. Never place unused product down any indoor or outdoor drain.

[Unconditional Money-Back Guarantee]

[For more information about flea and tick problems and how to solve them, call 1-800-XXX-XXXX weekdays, (time)]

* [Refund if not satisfied.]

[Satisfaction 100% guaranteed or your money back]

[100% Satisfaction guaranteed*] *or your money back

[If not completely satisfied with this product, return it to place of purchase with your receipt for a full refund.]

[[Brand] Satisfaction Guarantee: If, after following instructions, you are not satisfied with product results, send your name, address, and proof of purchase (original dated receipt) to: [Brand] Refund, [registrant address]

In case of emergency or for product use information, call [phone number] or visit our Web site: (adamsfleacontrol.com)(vet-kem.com)(biospotactivecare.com)(amdros.com)

For [more] information [about Brand name products] or in case of an emergency, call 1-XXX-XXX-XXXX [weekdays from][time] or visit our website: GetDirectProtect.com.

To learn more about treating current infestations and preventing future outbreaks, please visit our website (adamsfleacontrol.com)(vet-kem.com)(biospotactivecare.com)(amdros.com)

To learn more, visit (adamsfleacontrol.com)(vet-kem.com)(biospotactivecare.com)(amdros.com)

For more information, call our flea and tick experts at 1-800-XXX-XXXX

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

PRECOR® [and] [vIGRen®] [Spot On] are registered trademarks of Wellmark International. [Adams] and [Infestop][InfestStop] are trademarks of Farnam Companies, Inc.

Manufactured for:

Wellmark International

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