

2935-551

1/10/2011

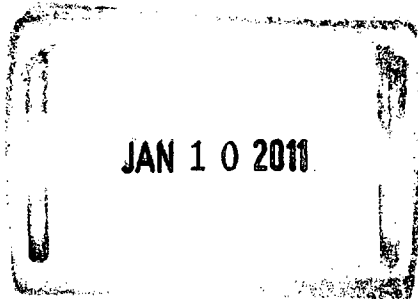
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Andy Chang
Wilbur Ellis Company
P.O. Box 1286
Fresno, CA 93715



Dear Mr. Chang:

Subject: Label Amendment- response to Notice of Registration dated November 24, 2010
Stiletto®
EPA Registration Number 2935-551
Your submission dated December 6, 2010

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable.

A stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard Gebken".

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

Enclosure

RESTRICTED USE PESTICIDE
 Due to Toxicity to Fish and Aquatic Organisms
 For retail sale to and use only by certified applicators or persons under the direct supervision and only for those uses covered by the certified applicator's certification.



WILBUR-ELLIS®

STILETTO®

For the control of armyworm, cricket, cutworm and Darkling ground beetle

ACTIVE INGREDIENT:

*Permethrin**.....

OTHER INGREDIENTS.....

By Wt.

0.5%

99.5%

100%

ACCEPTED

JAN 10 2011

2935-551

*(3-Phenoxyphenyl)methyl(+/-)cis-trans 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate
 **Cis-trans isomers ratio: Min. 35% (±) cis; Max. 55% (±) cis
 Min. 45% (±) trans; Max. 65% (±) trans

EPA Reg. No. 2935-551

EPA Est. No. 2935-CA-1

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS and DOMESTIC ANIMALS

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

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are natural rubber, polyethylene or neoprene. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All loaders, applicators, and other handlers must wear:

- Long-sleeve shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves for all handlers, except for applicators using motorized ground equipment, pilots, and flaggers.

See engineering controls for more requirements.

Follow the 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.

ENGINEERING CONTROLS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

| FIRST AID | |
|---|--|
| If swallowed: | <ul style="list-style-type: none"> •Call a poison control center or doctor immediately for treatment advice. •Have person sip a glass of water if able to swallow. •Do not induce vomiting unless told to do so by a poison control center or doctor. •Do not give anything by mouth to an unconscious person. |
| If Inhaled: | <ul style="list-style-type: none"> •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 on skin or clothing: | <ul style="list-style-type: none"> •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 in eyes: | <ul style="list-style-type: none"> •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. •Call a poison control center or doctor for treatment advice. |
| Have product container or label with you when calling a poison control center or doctor, or going for treatment. Poison Control Center: 1-800-222-1222 | |

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean water mark. Do not apply when weather conditions favor drift from treated areas. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash waters.

Under some conditions, it may also have a potential for transport into surface water in runoff (primarily adsorbed to suspended soil particles), for several months or more after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-lying tile drainage systems that drain to surface waters.

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

PHYSICAL AND CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

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. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, are:

- Coveralls
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material.

Useless otherwise directed by supplemental labeling, follow the Directions for Use as shown in each crop group section. STILETTO® is a pelletized formulation for the control of armyworm, cricket, cutworm and Darkling ground beetle. This product may be applied by hand equipment, ground equipment or aircraft. Apply when insects appear or feeding is noticed. The higher rate should be used as pest populations increase. With the exception of crops listed on this label rotational crops cannot be planted within 60 days of last application.

Resistance: Some insects are known to develop resistance to products used repeatedly for control. Since the development of resistance is unpredictable, the use of this product should conform to resistance management strategies established for the use area. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant insect strain may be present. If you experience lack of control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative treatment for your area.

BUFFER ZONE

Vegetative Buffer Strip

Construct and maintain a minimum 10-foot-wide vegetative filter strip of grass or other permanent vegetation between the field edge and down gradient aquatic habitat (such as lakes; reservoirs; rivers; permanent streams; marshes or natural ponds; estuaries; and commercial fish farm ponds.)

Only apply products containing permethrin onto fields where a maintained vegetative buffer strip of at least 10 feet exists between the field and down gradient aquatic habitat.

For guidance, refer to the following publication for information and maintaining effective buffers Conservation Buffers to Reduce Pesticide Losses. Natural Resources Conservation Services, USDA, NRCS 2000. Forth Worth Texas; 21pp.

<http://www.in.nrcs.gov/technical/agronomy/newconbuf.pdf>

Buffer Zone for Ground Application (groundboom, overhead Chemigation, or airstream)

Do not apply within 25 feet of aquatic habitats (such as lakes; reservoirs; rivers; permanent streams; marshes or natural ponds; estuaries; and commercial fish farm ponds.)

Buffer Zone for Non-ULV Aerial Application

Do not apply within 150 feet of aquatic habitats (such as lakes; reservoirs; rivers; permanent streams; marshes or natural ponds; estuaries; and commercial fish farm ponds.)

USE RATES AND RESTRICTIONS

Note: The preharvest interval is shown after each crop heading in parenthesis ().

Alfalfa, Alfalfa grown for seed (0*)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <p>*Do not apply within 14 days of harvest for rates greater than 0.1 lbs. a.i. (20 lbs. product) per acre.</p> <ul style="list-style-type: none"> Do not apply to mixed stands with intentionally grown forage grasses and/or legumes. Retreatment interval is 30 days. For seed alfalfa, make applications early morning or late evening when bees are not actively foraging. | | |

Artichoke (0)

| Insects Controlled | Rate of Application | Comments |
|---|------------------------|--|
| Cutworms Armyworms Crickets | 20-60 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.3 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 1.5 lbs. a.i. (300 lbs. product) per acre per season. Retreatment interval is 10 days. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Asparagus (1)

| Insects Controlled | Rate of Application | Comments |
|---|------------------------|--|
| Cutworms Armyworms Crickets | 10-20 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | .05-0.1 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.4 lbs. a.i. (80 lbs. product) per acre per season. Retreatment interval is 7 days. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Broccoli, Brussel Sprouts, Cauliflower, Chinese Broccoli (gai lon, white flowering broccoli;) Broccoli Raab (rapini) (1)

| Insects Controlled | Rate of Application | Comments |
|--|-------------------------|--|
| Cutworms Armyworms Crickets | 10-20 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | .05-0.10 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.8 lbs. a.i. (160 lbs. product) per acre per season. Retreatment interval is 5 days. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Cabbage; Cabbage, Chinese (napa) (tight-heading varieties only) (1)

| Insects Controlled | Rate of Application | Comments |
|---|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.4 lbs. a.i. (80 lbs. product) [0.8 lbs. a.i. (160 lbs. product) for Hawaii] per acre per season. Retreatment interval is 5 days. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Collards and Turnips (1)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 10-20 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | .05-0.1 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.8 lbs. a.i. (160 lbs. product) per acre per season. Retreatment interval is 3 days. Do not graze treated areas or feed crop to livestock. For use on collards in AR, AZ, GA, IL, IN, NC, OK, SC, and TX only. For use on turnips in FL, GA, IL, IN, OK, SC, TX and WA. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Corn (Field), Field Corn grown for seed, Popcorn

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.45 lbs. a.i. (90 lbs. product) per acre per season. Retreatment interval is 7 days. Forage may be harvested on the day of application. Do not make treatments less than 6 days apart or apply less than 30 days prior to harvest of grain or fodder. | | |

Corn, Sweet (1)

| Insects Controlled | Rate of Application | Comments |
|---|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 1.2 lbs. a.i. (240 lbs. product) per acre per season. Retreatment interval is 3 days. | | |

Cucurbit Vegetables Crop Group, including all varieties and hybrids of cucumbers; melons, gourds, pumpkins and squash, etc. (1)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 1.6 lbs. a.i. (320 lbs. product) per acre per season. Retreatment interval is 7 days. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Eggplant (3)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.6 lbs. a.i. (120 lbs. product) [1.0 lbs. a.i. (200 lbs. product for Hawaii)] per acre per season. Retreatment interval is 7 days. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Onions, Bulb and Garlic (0)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-60 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.3 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 2.0 lbs. a.i. (400 lbs. product) per acre per season. | | |

Leafy Vegetable (except Brassica) Crop Grouping including all varieties and hybrids of Amaranth; Arugula, Cardoon; Celery; Celery, Chinese; Celtuce, Chervil; Chrysanthemum, edible-leaved and garland; Corn salad; Cress, garden; Cress, upland; Dandelion; Dock; Endive; Fennel, Florence; Lettuce, head and leaf; Orach; Parsley; Purslane, garden; Purslane winter; Radicchio; Rhubarb; Swiss chard, Spinach (1)

| Insects Controlled | Rate of Application | Comments |
|---|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.8 lbs. a.i. (160 lbs. product) [1.2 lbs. a.i. (240 lbs. product) for Hawaii] per acre per season. Retreatment interval is 7 days. For spinach, do not apply more than 1.0 lbs. a.i. (200 lbs. product) per acre per season. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Ornamental Nursery Stock (field grown)

| Insects Controlled | Rate of Application | Comments |
|-----------------------------------|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |

Peppers, Bell (3)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 1.6 lbs. a.i. (320 lbs. product) per acre per season. Retreatment interval is 5 days. Avoid application when honey bees are actively foraging by applying during early morning or during evening hours. | | |

Potatoes (14)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 1.6 lbs. a.i. (320 lbs. product) per acre per season. Retreatment interval is 10 days. | | |

Tomatoes, Tomatillos (0)

| Insects Controlled | Rate of Application | Comments |
|--|------------------------|--|
| Cutworms Armyworms Crickets | 20-40 lbs./acre | Use higher recommended dosage for increased pest pressure or for increased residual pest control |
| Darkling Ground Beetle | 0.1-0.2 lbs. a.i./acre | |
| <ul style="list-style-type: none"> Do not apply more than 0.6 lbs. a.i. (120 lbs. product) [0.8 lbs. a.i. (160 lbs. product) for Hawaii] per acre per season. Retreatment interval is 7 days. Do not use on cherry tomato or other varieties in which the mature tomatoes will be less than 1 inch in diameter. | | |

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container only and keep sealed. Store in a cool, dry and closed storage area. Keep container tightly closed when not in use. Reduce stacking height where local conditions, such as humidity or pallet overhang, can affect package strength. Use caution when moving, opening, closing or pouring.

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

CONTAINER DISPOSAL:

Nonrefillable Container: Do not reuse or refill this container. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

ATTENTION:

Dealers Must Sell in Original Package.

Conditions of Sale and Limitation of Warranty and Liability:

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using the product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

ALL STATEMENTS MADE HEREIN ARE SUBJECT TO APPLICABLE LAW, AND TO THE EXTENT THERE IS ANY INCONSISTENCY OR CONTENTION, APPLICABLE LAW SHALL GOVERN.

The Directions for Use of the product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of many different factors including, without limitation, manner of use or application, weather, combination with other products, or crop conditions. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Manufacturer and Seller harmless from any claims relating to such factors

Seller warrants that this product conforms to the chemical description on the label.

EXCEPT FOR THIS WARRANTY, THE PRODUCT IS FURNISHED "AS-IS," AND NEITHER SELLER NOR MANUFACTURER MAKES ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, WITH RESPECT TO THE SELECTION, PURCHASE OR USE OF THIS PRODUCT; SELLER AND MANUFACTURER SPECIFICALLY DISCLAIM ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE BEYOND WHAT IS STATED ON THE LABEL. Buyer and User accept all risks arising from any use of this product, including without limitation, uses contrary to label instructions, or under conditions not reasonably foreseeable to (or beyond the control of) Seller or Manufacturer.

Neither Manufacturer nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE BUYER OR USER, AND THE EXCLUSIVE LIABILITY OF MANUFACTURER AND SELLER, FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THIS PRODUCT, OR, AT THE ELECTION OF MANUFACTURER OR SELLER, THE REPLACEMENT OF THE PRODUCT.

These Conditions of Sale and Limitation of Warranty and Liability shall be interpreted, unless otherwise required by the law of the state of purchase, in accordance with the laws of the State of California, excluding its conflicts of laws rules, and may not be amended by any oral or written agreement.

WILBUR-ELLIS® logo and STILETTO® are registered trademarks of Wilbur-Ellis Company.

F-092710-1

**In Case of Emergency,
Call CHEMTREC: (800) 424-9300**

**WILBUR-ELLIS COMPANY
P.O. BOX 16458 – FRESNO, CA 93755
2903 S. CEDAR AVE. – FRESNO, CA 93725
559-442-1220**

NET CONTENTS: 50 POUNDS

Batch Code _____