

28 JUN 1994

Mr. Sharon M. Johnston  
Roussel Uclaf Corporation  
95 Chestnut Ridge Road  
Montvale, NJ 07645

Dear Mr. Johnston:

Subject: Additional Use Patterns  
PY-SY Greenhouse Concentrate  
EPA Reg. No. 4816-628  
Submission dated March 25, 1994

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

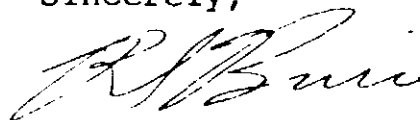
1) The following statements must appear as part of your Precautionary Statements text:

a) "Do not apply directly to food. Do not apply as a space spray while food processing is underway. In commercial food handling facilities, cover or remove any food during treatment. All food processing surfaces should be thoroughly cleaned with an effective cleaning compound followed by a potable water rinse before using."

b) "In hospitals, remove all patients prior to treatment. Ventilate area for 2 hours before returning patients."

2) Submit a revised Certification with Respect to Citation of Data (Offer to pay statement) indicating your chosen method of support.

Sincerely,



Robert S. Brennis  
Acting Product Manager 10

|                                  |  |  |  |  |  |  |  |
|----------------------------------|--|--|--|--|--|--|--|
| CONCURRENCE                      |  |  |  |  |  |  |  |
| Insecticide & Rodenticide Branch |  |  |  |  |  |  |  |
| Registration Division (7505C)    |  |  |  |  |  |  |  |
| SYMBOL                           |  |  |  |  |  |  |  |
| SURNAME                          |  |  |  |  |  |  |  |
| DATE                             |  |  |  |  |  |  |  |

## PY-SY GREENHOUSE CONCENTRATE

- Contains Pyrethrins and Synthrin®
  - For Use in Greenhouses and Nurseries
  - For Fast Control of Greenhouse and Horticultural Pests
- \* Use in TurboCide Pest Control System**
- For Use In and Around Food and Food Processing and Handling Sites, Commercial Transportation Facilities, Private and Commercial Dwellings, Animal Shelters, Schools and Day Care Centers, Hospices, Hospitals, and Nursing Homes, Non-residential Buildings, and Other Commercial, Industrial and Governmental Sites.
  - This Unique Aerosol System Employs Liquid Carbon Dioxide as a Solvent and Propellant.
  - Do Not Dispose of Container.
  - Return Containers for CO<sub>2</sub> and Active Ingredient to Manufacturer(s) for Refilling.

### ACTIVE INGREDIENT:

|  |         |
|--|---------|
| Pyrethrins   | 5.00%   |
| *Resmethrin [5-(phenylmethyl)-3-furanyl]<br>methyl 2,2-dimethyl-3-(2-methyl-1-propenyl)<br>cyclopropanecarboxylate | 8.00%   |
| INERT INGREDIENTS:   | 87.00%  |
|  | 100.00% |

\*Cis/trans isomers ratio max. 30% (±) and min. 70% (±) trans.

‡Contains Petroleum Distillate

GOLD - Gas Operated Liquid Dispenser

TurboCide GOLD - Trademark of Roussel Uclaf Corporation

Synthrin is a Registered Trademark of Roussel Uclaf Corporation

US Patent Nos. 5,020,689; 5,150,822

EPA Reg. No. 4816-628

EPA Est. No.

## KEEP OUT OF REACH OF CHILDREN CAUTION

### STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately.

Do not induce vomiting. Vomiting may cause aspiration pneumonia.

IF INHALED: Remove affected person to fresh air. Apply artificial respiration if indicated.

IF IN EYES: Flush eyes with plenty of water. Contact a physician if irritation persists.

IF ON SKIN: Wash affected areas of skin with soap and water. Contact a physician if irritation persists.

See side panel for additional precautionary statements

### NET CONTENTS:

Roussel Uclaf Corporation  
95 Chestnut Ridge Road  
Montvale, NJ 07645

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

28 JUN 1994

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

4816-628

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Avoid breathing vapor. Avoid contact with eyes, skin or clothing. Do not contaminate food or food contact surfaces.

### Personal Protective Equipment:

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category G on an EPA chemical resistance category selection chart.

### Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate or viton
- Shoes plus socks

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

### USER SAFETY RECOMMENDATIONS

#### Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing 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 fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent sites. Do not contaminate water when disposing of equipment washwaters.

### PHYSICAL HAZARDS

WARNING: Contents under pressure. Do not puncture. Do not use or store near heat or open flame. Exposure to temperatures above 130°F may cause bursting. Never throw container into fire or incinerator.

### STORAGE AND DISPOSAL

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

**Pesticide Storage and Spill Procedures:** Store upright at room temperature. Avoid exposure to extreme temperature. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fullers' earth, etc. Dispose of with chemical waste.

**Pesticide Disposal:** Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

**Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

**Containers One Gallon and Smaller:** Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

**Cylinder Disposal:** This cylinder must not be disposed of in any manner. Cylinders must be returned to point of purchase for credit. All cylinders, valves and caps remain the property of the manufacturer. Federal regulations prohibit the refilling of cylinders without written consent of the manufacturer.

### DIRECTIONS FOR USE

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

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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, is:

- Coveralls
- Chemical-resistant gloves, such as barrier laminate or viton
- Shoes plus socks

Application may be made using conventional mechanical or compressed air equipment or ULV equipment.

When diluting with water, prepare only that amount needed for immediate use. Holding a water dilution more than 24 hours is not recommended. Agitate occasionally.

APPLICATION CHART

|    | In Conventional Equipment<br>Fluid Ounces |             | In ULV Equipment<br>Fluid Ounces of PY-SY<br>(with or without water) |          |
|----|---|-------------|--|----------|
|    | 10 Gallons                                | 100 Gallons | Per 1000 Sq. Ft.   | Per Acre |
| 1. | 3.0                                       | 30.0        | 0.7  | 30.0     |
| 2. | 4.5                                       | 45.0        | 1.0  | 45.0     |
| 3. | 9.0                                       | 90.0        | 2.0  | 90.0     |

To control aphids, earwigs, leafminers, leafrollers, lygus bugs, mealy bugs and thrips, follow line 1 above. Apply to treat the upper and lower leaf surfaces.

To control whiteflies, follow line 2 in the application chart. Spraying should start as soon as flies appear and repeat at 3 to 4 day intervals until no flies are seen.

To control spider mites or severe whitefly infestations, follow line 3 in the application chart.

This product may be used in greenhouses or gardens on all ornamental plants except blooming African Violet or Maiden Hair Fern.

#### TURBOCIDE® PEST CONTROL SYSTEM

Cylinders should be checked periodically. A defective cylinder should not be used. A cylinder that has parts missing, is worn or is distorted should be replaced immediately. Store upright in a cool dry area. Pesticide that cannot be used according to label instructions must be returned to the point of purchase.

PY-SY Concentrate may be used as a space spray for the control of flying insects such as house flies, fruit flies and moths, or as a contact spray for the control of crawling insects such as ants, beetles, cockroaches and spiders.

For use in and around food and feed processing and handling sites, commercial transportation facilities, private and commercial dwellings, animal shelters, schools and daycare centers, hospices, hospitals, and nursing homes, nonresidential buildings, and other commercial, industrial and governmental sites.

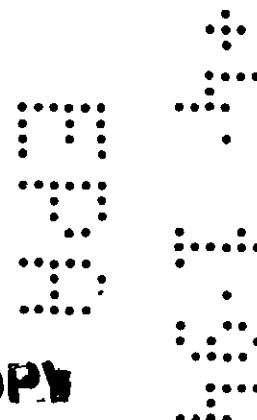
PY-SY Concentrate should be applied only with the appropriate high pressure gun and hose or through a fixed Turbocide® Spray System.

The portable system with its hand-held gun will produce a specific discharge rate, expressed in grams per second, depending on the nozzle size used. In a semi-portable system, or through a fixed installation, a dosing cylinder of a designated fill weight is connected to a nozzle system, thereby permitting a fixed dosage rate. This is calculated from the total cubic capacity of the premises. Different sizes of dosing cylinders thereby control the application rate. Where the dosing cylinder is filled from a supply cylinder, leave the valve open in the fill position prior to logging for ten minutes to allow the pressure to balance. Turn the valve from the fill position to the fog (spray) position to release insecticide and propellant. The semi-portable system can also be operated on a timer without a dosing cylinder. Do not operate any Turbocide® Pest Control System outside the temperature range of 50 - 95°F.

For optimum performance, close all doors and windows, shut off all HVAC equipment and keep the area closed for a minimum of 2 hours. The frequency of application should be determined by the degree of infestation and should be sufficient to interrupt the life cycle of the target species. The application of insecticide should also be timed to coincide with the peak activity of the target species. The dosage rates given below, pertain to exposure periods of 2 hours. Where exposure periods are in excess of 2 hours (i.e. up to 6 hours), then the application may be adjusted downwards to achieve the same level of control.

For control of flying insects such as house flies, fruit flies and moths with a 2 hour exposure period, apply PY-SY Concentrate at an application rate of up to 14 grams per 1000 cubic feet. After treatment, ventilate, clean up insects, repeat as necessary.

For control of crawling and flying insects as a contact spray, apply at an application rate of up to 14 grams per 1000 cubic feet. It should be noted that the system will only provide an aid in control of flour beetles.



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Application rates for target species are as follows:

| Target Species           |                           | Dose Rates<br>Target g PY-SY<br>Concentrate / 1000 ft <sup>3</sup><br>(mg of resmethrin/m <sup>3</sup> ) |       |
|--------------------------|---------------------------|--|-------|
| House Fly                | Musca domestica           | 4.5  | 0.135 |
| Fruit Flies              | Drosophila sp.            | 4.5  | 0.135 |
| Indian meal moth         | Plodia interpunctella     | 4.5  | 0.135 |
| German Cockroach         | Blattella germanica       | 9.0  | 0.270 |
| Oriental Cockroach       | Blatta orientalis         | 14.0   | 0.420 |
| Saw-toothed grain beetle | Oryzaephilus surinamensis | 14.0   | 0.420 |
| Cigarette beetle         | Lasioderma serricorne     | 14.0   | 0.420 |
| Confused flour beetle    | Tribolium confusum        | 14.0   | 0.420 |
| *Red flour beetle        | Tribolium castaneum       | 14.0   | 0.420 |
| Warehouse beetle         | Trogoderma variabile      | 4.5  | 0.135 |
| Ants                     | Formicidae                | 9.0  | 0.270 |
| Spiders                  | Araneida                  | 4.5  | 0.135 |

\*Aid in control only

#### TURBOCIDE GOLD® PEST CONTROL SYSTEM

Cylinders should be checked periodically. A defective cylinder should not be used. A cylinder that has parts missing, is worn or is distorted should be replaced immediately. Store upright in a cool dry area. Pesticide that cannot be used according to label instructions must be returned to the point of purchase.

PY-SY Concentrate may be used as a space spray for the control of flying insects such as house flies, fruit flies and moths, or as a contact spray for the control of crawling insects such as ants, beetles, cockroaches and spiders.

For use in and around food and feed processing and handling sites, commercial transportation facilities, private and commercial dwellings, animal shelters, schools and daycare centers, hospices, hospitals, and nursing homes, nonresidential buildings, and other commercial, industrial and governmental sites.

TurboCide GOLD® with PY-SY Concentrate is to be used as a space spray applied using apparatus designed or approved by Roussel Uclaf Corporation.

Apply TurboCide GOLD® with PY-SY Concentrate at an application rate not to exceed 14 grams/1000 ft<sup>3</sup> (0.42 mg of resmethrin/m<sup>3</sup>), diluting as required following the instructions of the spraying equipment.

For optimum performance, close all doors and windows, shut off all HVAC equipment. The area should be closed for a minimum of 2 hours after treatment. The frequency of application should be determined by the degree of infestation and should be sufficient to interrupt the life cycle of the target species. The application rates given below pertain to exposure periods of 2 hours. Where exposure periods are in excess of 2 hours (i.e. up to 6 hours), lower application rates may be used to achieve the same level of control.

For control of flying insects such as House Flies, Fruit Flies and Moths, apply TurboCide GOLD® with PY-SY Concentrate at a rate of up to 14 grams per 1000 cubic feet. (0.42 mg of resmethrin/m<sup>3</sup>). Ventilate before reoccupying the treated area.

For the control of crawling and flying insects, apply at a rate of up to 14 grams/1000 ft<sup>3</sup> (0.42 mg of resmethrin/m<sup>3</sup>). TurboCide GOLD® with PY-SY Concentrate may only provide an aid to the control of Flour Beetles. Ventilate before reoccupying treated area.

Application rates for target species are as follows:

| Target Species           |                           | Dose Rates<br>Target g PY-SY<br>Concentrate / 1000 ft <sup>3</sup><br>(mg of resmethrin/m <sup>3</sup> ) |       |
|--------------------------|---------------------------|--|-------|
| House Fly                | Musca domestica           | 4.5  | 0.135 |
| Fruit Flies              | Drosophila sp.            | 4.5  | 0.135 |
| Indian meal moth         | Plodia interpunctella     | 4.5  | 0.135 |
| German Cockroach         | Blattella germanica       | 9.0  | 0.270 |
| Oriental Cockroach       | Blatta orientalis         | 14.0   | 0.420 |
| Saw-toothed grain beetle | Oryzaephilus surinamensis | 14.0   | 0.420 |
| Cigarette beetle         | Lasioderma serricorne     | 14.0   | 0.420 |
| *Confused flour beetle   | Tribolium confusum        | 14.0   | 0.420 |
| *Red flour beetle        | Tribolium castaneum       | 14.0   | 0.420 |
| Warehouse beetle         | Trogoderma variabile      | 4.5  | 0.135 |
| Ant                      | Formicidae                | 9.0  | 0.270 |
| Spiders                  | Araneida                  | 4.5  | 0.135 |

\*Aid in control only

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

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