



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

JUN 24 2010

Kelly K. Naujock
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Subject: Label Amendment

EPA Reg. No. 4822-567
Gumby Insecticide OIK
Your submission dated February 4, 2010

Dear Ms. Naujock:


The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the revised labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. The data base for this product supports residual control for cockroaches, house and stable flies, carpenter ants, fire ants, mosquitoes, deer ticks, and cat fleas, but only for indoor treatments. Residual control claims are not supported for outdoor uses for cockroaches, flies, carpenter ants, fire ants, mosquitoes, scorpions and spiders. Refer to the enclosed Efficacy Review Memo (Myers, 04/21/10) for details.
2. *Since this product is for use outdoors, revise the general claims: "(Kills) (controls) through contact"; "(Kills) (controls) listed pest...for up to..."; "Keeps on (killing) (controlling) listed pests..."* and residual control claims for carpenter ants, fire ants, ticks, fleas, cockroaches, mosquitoes, scorpions, spiders, and flies to "kills" only claims.
3. Revise the general claim for "flies" to read "house flies and stable flies" throughout the label. Claims are only supported for house flies and stable flies.
4. On page 5, under *Perimeter pests*, revise "...barrier area" to read "perimeter area." The term barrier is an implied claim for residual control.
5. On page 5, delete the *Residual Spray* heading. Residual claims are not supported for outdoor uses of this product.
6. Revise the general claim for "bugs" to read "listed bugs" throughout the label.
7. The alternate confidential statement of formula (CSF) dated 02-04-2010 is acceptable.
8. The product chemistry data requirements for guidelines 830 Series Subgroup A and B are satisfied with the exception of the one year storage stability (830.6317) and corrosion characteristics data

(830.6320). You have indicated that the studies for these data are already in progress and will be submitted to the Agency this year.

9. You indicated that a starter kit and refill bottles will be sold with this product and that both the outer packaging of the starter kit and bottles will contain all required labeling elements, as indicated in our Notice of Registration. You are reminded that if the outer packaging label deviates from the specified requirements, you must submit the kit labeling for review and approval.

If you have questions regarding this action, please contact Olga Odiott at (703) 308-9369.

Sincerely,

Mark Suarez
Product Manager 13
Insecticide Branch
Registration Division (7505P)

Enclosure

[Note to reviewer: This product is in a bottle with a unique closure for use specifically with a custom sprayer devices. A starter kit will be sold which incorporates one sprayer and one or several bottles. Bottles will also be sold as refills without the sprayer. Both the outer packaging of the starter kit and the bottles will contain all required labeling elements, but the optional marketing claims on each may vary.]

Gumby Insecticide OIK

ACTIVE INGREDIENT:

Deltamethrin 0.5%

OTHER INGREDIENTS 99.5%

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUN 24 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
4822-5107

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional Precautionary Statements on (back)(side)(bottom)(label)

NET CONTENTS: 16 oz.

(Kills)(controls) listed (insects)(pests) for up to 4 weeks
Keeps on (killing)(controlling) listed (insects)(pests) for up to 4 weeks
(Kills)(controls) through contact
Keeps (killing)(controlling)(residual control of) flies, house flies, stable flies for up to (4 months)(18 weeks)
Keeps (killing)(controlling)(residual control of) (cockroaches)(roaches) for up to (2 months)(8 weeks)
Dual (kill)(control) - through contact and residual action for up to 4 weeks
Residual control of (cockroaches)(roaches)(crickets)(flies) for up to 2 months
(Kills)(controls) (cockroaches)(roaches)(fleas)(flies)(mosquitoes)(insects)(bugs) in two ways: (1) it(kills)(controls)(cockroaches)(roaches)(fleas)(flies)(mosquitoes) (insects)(bugs) through contact and (2) it keeps on (killing)(controlling) with residual action even after you spray for up to 4 weeks (16 fl oz)(1 pint)(1 refill) treats up to 2,000 square feet
No (greasy)(sticky)(oily) residue
(Kills)(controls) the insects you see, (kills)(controls) the ones you don't see for up to 4 weeks
Killing power for up to 4 weeks
For outdoor use only
Ready-to-use
Ready to spray
Easy to use!
Water-based (formula)(concentrate)
Water-dilutable (formula)(concentrate)

Do-it-yourself home pest control
 Control of ticks around the home
 Outdoor use around the home
 (16 fl oz)(1 pint) treats up to 2,000 square feet
 Contains deltamethrin
 For control of ants
 (Kills)(controls) fleas & ticks
 (Kills)(controls) over 20 listed insect pests
 (Kills)(controls) more than 20 listed insect pests
 (Kills)(controls) listed crawling & flying insects
 (Kills)(controls)(fall)(fall appearing) insects outside before they move inside your home (for the winter)
 (Kills)(controls) ticks that may carry Lyme Disease
 (Kills)(controls)(protects against) mosquitoes that may carry West Nile Virus
 (Kills)(controls) annoying mosquitoes and other listed insects
 (Kills)(controls) annoying mosquitoes and other listed outdoor insects
 Also (kills)(controls): carpenter ants, centipedes, scorpions, spiders & many more listed on back
 (Kills)(controls) the following insects: ants, carpenter ants, centipedes, crickets, grasshoppers, pill bugs, scorpions, sowbugs, spiders, ticks
 Its formula is specifically designed to kill listed crawling and flying insects
 Effective against flies, mosquitoes and ants
 An outdoor product for use in outdoor areas including backyards, patios & decks
 Ideal for (backyards)(decks)(patios)!
 Non-staining (where water alone does not stain)
 (Kills)(controls) listed bugs outdoors
 Mosquito (killer)(controller)
 (Kills)(controls) listed flying insects
 (Kills)(controls)(mosquitoes)(house flies)(and)(fleas)
 Use with confidence
 Control of (carpenter ants)(cockroaches)(roaches)
 (waterbugs) (palmetto bugs)(crickets)(flies)
 Keeps (killing)(controlling)(residual control of) crickets up to (5 months)(20 weeks)
 Keeps (killing)(controlling)(residual control of) carpenter ants for up to (1 month)(4 weeks)
 Keeps (killing)(controlling) ants (crazy ants, false honey ants, little black ants, pharaoh ants, pavement ants, fire ants) for up to 1 week
 (Kills)(controls) bugs before they enter your (home)(house)(garage)
 No lingering chemical smell
 No lingering chemical odor

Apply to foundations and other areas (such as decks, driveways, fences, garbage cans, patios, sidewalks, walkways, walls) where insects may congregate or gain entrance into your (home)(house)(garage)
 For up to 4 weeks of control of (carpenter ants)(cockroaches) (roaches)(crickets)(fleas) (flies)(mosquitoes)
 (Treats)(for use in) areas such as porches, patios, window frames, eaves, garbage cans, garages and cracks and crevices along walkways
 (Treats)(for use in) areas where insects may congregate or gain entrance to your (home)(house)(garage)
 Easy to use hose end sprayer
 Hose end convenience

[Note to Reviewer: Device Version A]

Assembly Instructions:

- 1. Before each use check to make sure you are using the correct Gumby product for your problem.**
- 2. Shake the refill well before each use. For (lengthy) spraying jobs, shake the refill every 2 hours.**
- 3. Remove the cap.**
- 4. (Insert) (snap) refill (bottle) (in place) into sprayer (device).**
- 5. To change refill (bottle) or when refill (bottle) is empty, hold (sprayer) (device) with one hand and (push button) to release (refill)(bottle) from (sprayer)(device).**

[Note to reviewer: The following alternate assembly instructions may be added to or could replace portions of the basic assembly instruction above to accommodate potential configurations of the device.]

Align (arrows) (marks) (neck) on (refill) (bottle) with (arrows) (marks) (opening) on (sprayer)(device) and ensure (refill) (bottle) is properly inserted.
Replace (refill) (bottle) if empty
Slide (refill) (bottle) into (sprayer) (slot). Click in place.
Use only Gumby product (refill) (bottle) with this (sprayer) (device).
Before inserting new (refill) (bottle), wipe seals clean from dirt and debris. After insertion, spray for XXX (minutes)(seconds) to start the flow of product. Seal between sprayer and refill created automatically.
The refill valve insert on the (refill) (bottle) is not removable. Do not remove attached valve insert from (refill) (bottle). Do not remove (black) (red) (other specified color) insert (cap).
Insert refill until you hear it click (or button pops out).
Place hand under the refill and press the release button on the (front)(side). The (refill) (bottle) will drop from the (sprayer) (device).

[Note to reviewer: On addition to all of the instructions above, below are additional instructions for device Version B]

Additional Hose-End Sprayer Instructions

- 1. Shake container well before use. Make sure the water supply from the garden hose is off and the knob control lever (button) on the sprayer is in "OFF" position, then connect the sprayer to the garden hose.**
- 2. Turn water on at faucet. To begin spraying, turn (rotate) knob control lever (depress button) to the ON position. The product mixes automatically with the water as you spray. Begin treatment of the furthest area and work back (toward the faucet) so you do not come into contact with the treated areas.**
- 3. When spraying low growing ground covers and small shrubs, twist the sprayer nozzle to the "FAN" position. When spraying taller trees, shrubs and ornamentals, twist the nozzle to the "STREAM" position for extended reach and uniform coverage.**
- 4. To stop spraying, turn (rotate) the knob control lever to "OFF" position (release button). Turn off water at the faucet. To release pressure before disconnecting the sprayer from the garden hose, turn knob control lever to the "ON" position (depress button) and point the sprayer away from any desirable plants.**

[Note to Reviewer: For both devices, the concentration of the active ingredient at the time of application, which is after dilution with water, is 0.03125%.]

[Note to reviewer: On the outer packaging of the starter kit a referral statement will be used for the Directions for Use in lieu of the full text. It will read "Directions for Use. It is a violation of federal law to use this product in a manner inconsistent with its labeling. Refer to product bottle for complete use directions." The storage and disposal section will remain as full text on this outer packaging.]

Directions for Use:

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

[Note to reviewer: The concentration of the Active Ingredient at the time of application, which is after dilution with water from the device, is 0.03125%.]

Shake the (refill)(cartridge)(bottle) vigorously before each use. For lengthy spraying jobs, re-agitate the (refill)(cartridge)(bottle) every (1/2 hour)(1 hour)(2 hours). **Not for use around electrical equipment.**

Wear long-sleeved shirt and long pants while applying this product. Do not apply this product in a way that will contact people either directly or through drift. Do not allow people or pets on treated areas until spray has dried. To avoid drift, spray on calm days. DO NOT spray near streams or rivers as this product is toxic to aquatic life. DO NOT spray food crops. DO NOT let overspray hit plants in hot summer weather (i.e. 85F)(30C) as spray may burn the plants. For best results, spray when the insects or damage are first observed.

Perimeter pests: Ants, carpenter ants, brown dog ticks, centipedes, cockroaches, crazy ants, crickets, deer ticks, earwigs, false honey ants, field crickets, fire ants, fleas, grasshoppers, ground beetles, little black ants, lone star ticks, palmetto bugs, pavement ants, pharaoh ants, pill bugs, scorpions, sowbugs, spiders, ticks, waterbugs - To help prevent infestations of buildings apply where pests are active and may find entrance. For example, treat a band of soil or lawn up to 6-10 feet wide around and next to buildings and treat the foundation up to a height of 2 to 3 feet. *One 16 oz. refill treats 2000ft² of surface area.* Thoroughly and uniformly wet the barrier area, but do not allow runoff to occur.

Fleas & Ticks: Apply as a course, wet spray to areas where fleas and ticks are most likely to be found, such as dog houses, kennels, runways, cracks and crevices in sidewalks, paths or patios, under plants, shrubs, bushes, trees or other shaded, moist areas where pets may rest. Apply spray until surfaces are thoroughly wet but do not allow run-off or excessive dripping to occur. Do not treat pets with this product.

Residual Spray: For control of pests such as ants, Asian lady beetles, box elder bugs, cockroaches, crickets, fleas, flies, mosquitoes, palmetto bugs, waterbugs. Spray areas such as porches, patios, window frames, eaves, garbage dumps, garages, cracks and crevices along walkways or other areas where insects may congregate or can gain entrance to the structure. Apply spray until surfaces are thoroughly wet but do not allow run-off or excessive dripping to occur.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place away from children. Do not allow to freeze. Nonrefillable container.

DISPOSAL: If empty: Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if inhaled. Avoid breathing vapor or spray mist. Avoid contact with skin or clothing. Contact with product may result in transient tingling and reddening of the skin which may persist for 24 hours. Wash hands

8/8

thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse.

First Aid	
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 treatment advice
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fresh water and estuarine fish and invertebrates. Do not apply directly to water. 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 or weeds if bees are visiting the treatment area.

PHYSICAL HAZARDS

Do not spray conduits, motor housings, junction boxes, switch boxes, or other electrical equipment because of possible shock hazard.

Questions? Comments? Call 800-558-5252 or write Helen Johnson.

Sold by: ©2008 S.C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A.

All Rights Reserved

EPA Reg. No. 4822-567

EPA Est. No.