

6218-56

2/3/2009

1/4

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 3, 2009

Mr. Jonathan S. Cohen, President
Summit Chemical Company
235 South Kresson Street
Baltimore, MD 21224-2616

**Subject: Revised Labeling, Response to PR Notices 2001-1 & 2007-4
Summit® PYRETHRINS FOGGING CONCENTRATE 3610, EPA Registration No. 6218-56
Your Submission Dated November 26, 2008**

Dear Mr. Cohen:

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

Storage & Disposal section comment(s):

1. Replace the subsection currently labeled as "**STORAGE:**" with:

"Do not contaminate water, food or feed by storage and disposal.
PESTICIDE STORAGE: Keep this product in its tightly closed original container when not in use. Store in a cool, dry area that is away from heat or open flame."
2. Replace the subsection currently labeled as "**PESTICIDE DISPOSAL:**" with: "**PESTICIDE DISPOSAL:** Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility."
3. Replace the existing subsection header "**RESIDUE REMOVAL:**" with: "**CONTAINER DISPOSAL:**"
4. Delete the existing subsection header "**CONTAINER DISPOSAL:**"
5. Replace the last sentence at the end of the newly renamed "**CONTAINER DISPOSAL:**" subsection with the following: "Offer for recycling or reconditioning, if available, or puncture and dispose of in a sanitary landfill, or by other procedures allowed by state and local authorities."

Summit Chemical Company should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). Further, EPA's RED for products containing MGK® 264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide and MGK® 264.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. 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 FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions regarding the label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



For

Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure: *Copy of label stamped "Accepted with Comments"*

006218-00056 D403413

PYRETHRINS FOGGING CONCENTRATE 3610

FOR APPLICATION BY TRAINED PERSONNEL ONLY
For Use in Homes, Restaurants, Food Processing Plants,
Warehouses, and other Industrial Installations

ACTIVE INGREDIENTS:

Pyrethrins	3%
*Piperonyl butoxide, technical	6%
†N-octyl bicycloheptene dicarboximide	10%

INERT INGREDIENTS:

Contains Petroleum distillates	81%
--------------------------------	-----

*Equivalent to 4.8% (butylcarbityl) (6-propylpiperonyl) ether and 1.2% related compounds.

†MGK 264, Insecticide Synergist.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

- IF SWALLOWED:**
- Immediately call a poison control center or doctor.
 - Do not induce vomiting unless told to do so by a poison control center or doctor.
 - Do not give any liquid to the person.
 - Do not give anything by mouth to an unconscious person.
- IF INHALED:**
- Move person to fresh air.
 - If person is not breathing, call 911 or 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:**
- 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:**
- 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 eye.
 - Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Contains petroleum distillate - vomiting may cause aspiration pneumonia.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-888-740-8712 for emergency medical treatment information.

See Side Panel For Other Precautionary Statements

This Concentrate is designed for use undiluted in mechanical sprayers which give particle sizes of aerosol size. It can be diluted with refined kerosenes which meet Food Additive Regulation CFR Title 21, 172.884 and can be applied in fogging equipment that gives larger than aerosol particle size, such as the Fogmaster machines. It can also be diluted with oil specified above and applied as a contact spray to kill crawling insects shown on this label.

EPA Registration No. 6218-56

EPA Establishment No. 6218-MD-2

235 S. Kresson Street

A PRODUCT OF



Baltimore, Maryland 21224

ACCEPTED
With COMMENTS
In EPA Letter Dated:

February 3, 2009

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

6218-56

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing vapor or spray mist. Wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health under the provisions of 30 CFR part 11. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Do not apply directly to food. Do not apply space spray while food processing is underway. Cover or remove all food processing surfaces. Thoroughly wash all food processing plants, bakeries and other food processing plants, wash with an acceptable detergent solution and rinse with potable water to remove all traces of contamination on the equipment, benches, shelving, etc., where exposed food will be handled. Food processing operations do not have to be stopped while applying a wet spray with care and in accordance with the directions and cautions above in those establishments which do NOT operate under Federal meat, poultry, shell egg grading and egg products inspection programs.

When using in animal housing areas, do not apply directly to food, water or feed supplements. Do not apply directly to animals. Wash teats of dairy animals before milking.

Remove pets, birds and cover fish aquariums before spraying.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not apply directly to water or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

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 Pollutant 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.

PHYSICAL OR CHEMICAL HAZARDS

Do not store near heat or open flame.

NET CONTENTS

Insecticides For The Food Industry

Summit

PYRETHRINS FOGGING CONCENTRATE 3610

DIRECTIONS FOR USE

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

Mix well in drum before sampling and each use. Keep container closed and store in a cool place. DO NOT STORE, POUR OR SPILL NEAR OPEN FLAME.

Note: This spray when diluted properly as described, and applied per the directions and cautions given above, conforms with Food Additive Regulations 40 CFR, Sections 185.45, 185.49 and 185.52 and the food additive tolerances established thereunder. Additionally, when diluted and used according to label directions, this spray will meet specifications for use under USDA poultry, meat, rabbit and egg products inspection program.

Contact and Space Spray — Undiluted — To Kill Cockroaches, Silverfish, Earwigs, Ants, Spiders, In Sheltered Situations: With ULV spraying device, apply the spray into all cracks and crevices in woodwork, walls, floors, underneath sinks, behind pipes and in all places where these insects shelter. Contact as many insects as possible. Do not allow spray to contact stored food. Use at a dosage rate of approximately 1/2 fl. oz. per 1,000 cu. ft. of room space. Repeat dosage as necessary for control. Leave the room closed for one hour. Do not remain in treated areas and ventilate area before re-entry. Do not apply this undiluted spray in facilities operating under USDA poultry, meat, rabbit and egg products inspection program.

Space Spray — Undiluted in Aerosol Generators — To Kill Flies, Mosquitoes, Small Flying Moths and Gnats: Cover or remove exposed food and food handling surfaces. Close room and shut off all air conditioning or ventilating equipment. Apply at the rate of 1.0 oz. of undiluted Concentrate per 1,000 cubic feet of space. Direct output from aerosol generator upward towards upper corners of room and ceiling. Leave room closed for one half hour. Ventilate room thoroughly before re-entry. Do not apply this undiluted spray in facilities operating under USDA poultry, meat, rabbit and egg products inspection program.

Space Spray — Diluted for Ordinary Mechanical Fogging Equipment — To Kill Flies, Mosquitoes, Small Flying Moths and Gnats: Cover or remove exposed food and food handling surfaces. Close room and shut off all air conditioning or ventilating equipment. Dilute Concentrate with oil at the rate of 1 part Concentrate plus 29 parts of oil and mix well. Apply at the rate of 50 fluid ounces dilute spray (0.4 gallons) per 25,000 cubic feet of space. Direct fog upward towards upper corners of room and ceiling area. Leave room closed for one half hour. Ventilate room thoroughly before re-entry.

Contact Spray — Diluted for Use with Sprayers that Give Large, Wetting Spray Particles — To Kill Cockroaches and Accessory Stages of Granary Insects: Weevils, Flour Beetles, Meal Moth Larvae and Adults, Caddisflies, Grain Mites and Saw-toothed Grain Beetles: Cover or remove exposed food and close room as described above. Dilute Concentrate with oil at the rate of 1 part Concentrate plus 29 parts of oil and mix well. Spray outside walls of grain bins, flooring, about base of milling machinery, walls and baseboards, areas behind cabinets, around pipes and other insect harborage using one gallon spray per 1,000 square feet of surface. Force spray into all cracks and crevices. Repeat applications as necessary.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place, keep container closed. Do not store near heat or open flame.
PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

RESIDUAL REMOVAL:
For containers less than 5 gallons - Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

For containers greater than 5 gallons - Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Then offer for recycling or reconditioning.

BATCH OR LOT NUMBER ON CONTAINER.

4/4