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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Madhu Mandava Voluntary Purchasing Groups, Inc. P.O. Box 460 Bonham, TX 75418

SEP 2 4 2008

Dear Mr. Mandava:

Subject: Amendment – Update First Aid, Precautionary Text, Directions, and Claims,
Add 1-year claim for Carpenter Ants in treated wall voids
Hi-Yield Kill-A-Bug II Dust
EPA Reg. No. 7401-452
Your submission dated July 2, 2008

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7(a), is conditionally acceptable provided that you:

- 1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
- 2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. While the proposed updates to the First Aid, Precautionary text, directions for use, and most of the new claims are acceptable, the addition of the 1-year claim for control of carpenter ants in treated wall voids is not acceptable at this time because this is a data-supported claim. If you wish to add such a claim, then you must either submit or cite appropriate efficacy data. Such an amendment would also have to be accompanied by an Offer to Pay, a Data Matrix, and a Formulator's Exemption form. At this time, please delete the claim for 1-year control of carpenter ants in treated wall voids.

A stamped copy of the label is enclosed for your records. Please forward to the Agency three copies of labeling bearing the above revision, prior to release for shipment under the amended label.

Sincerely,

George LaRocca.
Product Manager 13
Insecticide Branch
Registration Division (7505P)

[Front Label Panel]

with COMMENTS In EPA Letter Dated: SEP 2 4 2008 Under the Federal Insecticide,

Fungicide, and Rodenticide Act. s amended, for the pesticion

ACCEPTED

Hi-Yield® Kill-A-Bug[®] II Dust **Containing Deltamethrin**

- For Indoor/Outdoor Residential Use Only
- [For Household Use]
- [Household Ornamental & Vegetable Garden Insect Control]
- [• Controls Ants, Fire Ants, Fleas, Ticks and More]
- [Kills Organophosphate & Carbamate Resistant and Non-Resistant Cockroach Strains]
- [Odorless]
- [• Long-Lasting Residual Action]
- [• Kills Insects for up to 8 Months]
- [• Kills Carpenter Ants Invading Treated Wall Voids For Up To 1 Year (12 Months)]
- [• Does not Clump or Absorb Moisture]
- [Water-Proof Dust]
- [Water-Proof Does Not Absorb Moisture]
- [• Use on Roses, Flowers & Ornamentals]
- [• 1 Lb. Treats Up To 45 Fire Ant Mounds]
- [Easy To Use]
- [• Convenient]
- [• Kills Fire Ants on Contact]
- [• Kills The Queen]
- [• Ready-To-Use Dry Treatment Of Fire Ant Mounds]
- [• Kills The Mound]
- [• Works Fast]
- 1-Denotes Optional Statements

ACTIVE INGREDIENT:

Deltamethrin..... 0.05% OTHER INGREDIENTS: 99.95% 100.00%

PRECUACION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente

(TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

KEEP OUT OF REACH OF CHILDREN **CAUTION**

See Side/Back Panel For Additional Precautions and First Aid

Net Weight	
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EPA REG. NO. 7401-452

EPA EST. NO. 7401-TX-001

[Back/Side Label Panel]

	FIRST AID
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.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of medical emergencies or health and safety inquires, information may be obtained by calling the National Pesticide Information Center at 1-800-858-7378.

PRECAUTIONARY STATEMENTS Hazards to Humans And Domestic Animals

CAUTION

May be harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Do apply directly to water. Use with care when applying in areas adjacent to any body of water. Do not contaminate water when disposing of equipment washwater.

DIRECTIONS FOR USE

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

IMPORTANT: Read the entire Directions for Use, Precautions and Disclaimer of Warranties before using this product. Hi-Yield[®] Kill-A-Bug[®] II Dust Containing Deltamethrin is a ready-to-use insecticide dust which exhibits effective knockdown and long-lasting control against pests listed when used according to label directions. Hi-Yield[®] Kill-A-Bug[®] II Dust Containing Deltamethrin can be used for long-lasting pest control in and around homes and their immediate surroundings. Permitted areas of use include but are not limited to:

- *animal quarters
- *apartments
- *household greenhouses
- *houses

- *mobile homes and recreational vehicles
- *ornamentals
- *vegetables

This product is intended for applications with a hand duster or from the shaker can, with a paint brush or by other suitable means, to hiding and runway areas and other places where insects are found.

INDOOR USE

In living areas, make applications in such a manner as to avoid deposits on exposed surfaces or introducing the material into the air. To avoid the possibility of staining, do not use on carpets, upholstery and other fabrics, Don not apply as a broadcast application indoors.

To apply insecticide directly into cracks and crevices, use a bulbous duster, or other suitable equipment. Apply lightly and uniformly to infested area. Pay particular attention to cracks and crevices; service ducts, false floors and ceilings; wall void; around electrical and telephone fittings and equipment; around water and sewer pipes; under and behind cabinets; refrigerators and sinks; around windows and door frames; along baseboards; in attics and crawl spaces. The amount to be applied will vary with the site but should usually be in the range of 2-3 grmas of product per square yard (or ½ lb. per 1000 square feet).

Ants, Boxelder Bugs, Cockroaches (including Both Resistant and Non-Resistant Strains), Crickets, Fleas, Firebrats and Silverfish: Apply Hi-Yield[®] Kill-A-Bug[®] II Dust Containing Deltamethrin thoroughly to all areas where these pests crawl and hide, especially in those areas described above. For Ants, apply to ant trails, around doors and windows and other places where ants enter premises.

Carpenter Ants and Carpenter Bees: Apply to voids to channels in damaged wooden members of a structure, to cracks, spaces or bearing joints between wooden members of a structure; or between such members and the foundation; and in locations vulnerable to attack. Drilling may be necessary prior to applying dust in these locations, but it must be recognized that such drilling and treating of timber in a particular location may not result in complete coverage of infested and vulnerable voids or galleries. This dust can be applied in attics and crawl spaces to prevent entry at a rate of ½ lb. per 1000 square feet of floor area. In these treatments, all vents and blowers should be closed. Inspect at 6 months and one year to ensure that colony has been killed.

Wall Void Treatments: [To Control *Carpenter Ants* in wall voids for up to one year [12 months],] apply dust into wall voids through existing openings or by drilling a small hole. Insert end of puffer tip into opening and squeeze container [Insert top of hand-duster into opening and squeeze]. Apply approximately .0.2 grams (0.07 lbs/100 sq. ft.) of dust per wall void [by viewing markings on side of container/bottle] [approximately one quick burst]. Reseal hole after treatment. Nests in wall voids can be located be listening for insect activity against wall. *Centipedes, Ground Beetles, Millipedes, Scorpions, Spiders* and *Sowbugs*: Apply dust along and behind baseboards, to window and door frames, corners, pipes, storage locations, attics, crawl spaces, and other areas where these pests may enter or crawl.

Wasps and Bees: It is generally advisable to treat wasp and bee nests in the evening when insects are less active and have returned to the nest. Wear protective clothing if deemed necessary to avoid stings.

Using hand or power duster or other suitable means, with extension tubes if necessary, thoroughly dust nets, entrance and surrounding areas where insects alight. Nests in wall voids

can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in and reseal. For *Ground Wasps*, dust entrance and surrounding areas. For best results check nests carefully one or two days after treatment to ensure complete kill then remove and destroy nest to prevent emergence of newly -hatched insects. If removal is not feasible, retreat nest if necessary. Do not use this product to treat overhead nests.

Webbing Clothes Moths: Use Hi-Yield[®] Kill-A-Bug[®] II Dust Containing Deltamethrin as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on the clothes. DO NOT apply this product directly to clothing.

Carpet Beetles (Black, Furniture, Common and Varied): Dust where these insects are found, for example: under edges of floor coverings, behind baseboards, under rugs and furniture, and in closets. Do not apply directly to carpeting.

Bedbugs: Apply to crack and crevices where evidence of bedbugs occurs. This includes bed frames, box springs, inside empty dressers and clothes closets, and carpet edges, high and low wall moldings, and wall paper edges. Do NOT use this product on mattresses, pillows, bed linens, or clothes. Remove all clothes and other articles from dressers or clothes closets before applications. Not recommended for use as sole protection against bedbugs. If evidence or bedbugs is found in/on mattresses use product approved for this use.

Stored Product Pests:

To aid in control of the exposed stages of:

cadelles
cheese mites
cigarette beetles
confused flour beetles
dark meal worms
drugstore beetles
grain mites
granary weevils
lesser grain borers

merchant grain beetles red flour beetles rice weevils rusty grain beetles saw-toothed grain beetles spider beetles tobacco moths yellow meal worms

In the home, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Remove or cover exposed food.

Clean up wastes materials, dust, dirt, and other debris. Thoroughly treat floors, walls and other surfaces in storage and handling areas. Apply dust in cracks and crevices, behind and under cupboards, and other difficult to reach areas where insects may hide. DO NOT apply directly on food, utensils or on areas where food is stored.

OUTDOOR USE

Ornamental Plant Pests

For the control of: aphids

beet armyworms

leafrollers orange tortrix blister beetles
boxelder bugs
certain leafminers
(Boxwood, Holly
Oak, Spruce Needle)
elm leaf beetle
flea beetles
Japanese beetles
leafhoppers

periodical cicada plant bugs rose chafer rose midges rose slugs tent caterpillars thrips weevils

SHRUBS AND ORNAMENTALS: Apply when insects or their damage first appear and repeat at weekly intervals if necessary. Apply 8 ounces per 10000 square feet; or thoroughly apply to place a thin layer of dust on both upper and lower sides of leaves, stems and flowers. ROSES, PETUNIAS, CHRYSANTHENMUMS, GERANIUMS, CARNATIONS AND OTHER RELATED FLOWERS: To control many leaf and flower chewing insects, apply as soon as the insect appears and repeat at 7 day intervals or as long as insects continue to appear. Apply a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

OUTDOOR USE

PERIMETER TREATMENT: Use Hi-Yield[®] Kill-A-Bug[®] II Dust Containing Deltamethrin as a residual treatment for control of *Ants, Bees, Centipedes, Cockroaches, Crickets, Firebrats, Fleas, Ground Beetles, Millipedes, Scorpions, Silverfish, Slugs, Sowbugs, Spiders, Ticks* and *Wasps*. Make a residual treatment around windows and doors, porches, screens, eaves, patios, garages, under stairways, in crawl spaces and other areas where pests hide. To help prevent the invasion of buildings structures by these pests apply thoroughly and uniformly to the foundation and crawl spaces where pests are active and may find entrance.

Fleas and Ticks in Rodent Burrows: To control Fleas and Ticks in and around rodent burrows around homes and other buildings, apply dust with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge). Be sure to treat abandoned rodent burrows which are suspected of containing fleas and ticks. Treat for a minimum of 5 days for light rodent populations, 10 days when populations are dense

HOME VEGETABLE GARDENS: Use a dust applicator such as a shaker can, dust gun, puffer or other bulbous duster, rotary duster or other appropriate available duster. Dust lightly to cover both upper and lower leaf surfaces with a thin, even film of dust. Apply when air is calm to avoid drift and contact with eyes and skin. Start applying at the farthest corner of the treatment area and work backward to avoid contact with dusted surfaces. Allow dust to settle in treated areas before reentering.

VEGATABLE	TARGET PESTS	REMARKS -	Application Rate: Oz. of dust/100ft ²	Max Application/ growing season	[Active ingredient /Acre] (This column is alternate text)	[Packages/ 100 ft²] s (This column is alternate text)
Artichoke, Glob	e Aphids, armyworm, cabbage looper, cribrate weevil, leaf-miners, lygus bug (plant bug), pale striped flea beetles, plume moth, probas bug	Do not apply more than recommended amount [0.14 lb ai/A (active ingredient /acre)]in one growing season. Allow 3 days between application Do not apply within 3 days of harvest.	2.13 ns.	5	0.028lb	X Packages /100 ft²
Bulb vegetables- garlic, leeks, onions, shallots	Cutworms, stink bugs thrips	Do not apply more than recommended amount [0.112 lb ai/A] in one growing season. Allow 5 days between applications Do not apply within one day of harvest.	2.13	4	0.028 lb	X Packages /100 ft ²
Corn, Sweet	Aphids, armyworms, chinch bugs, click beetle, corn earworm, corn rootworm (adult), cutworms, European corn borer, flea beetles, grasshoppers, Japanese beetle (adult), June beetle (adult), Masked chafer (adult), Southern corn borer, South-western corn borer, stalk borer, stink bugs, webworms	Do not apply more than recommended amount [0.45 lb at one growing season. Do not apply within 24 hours of harvest.		16	0.028 lb	X Packages /100 ft ²
Corn, Pop	Aphids, armyworms, chinch bugs, click beetle, corn earworm, corn rootworm (adult), cutworms, European corn borer, flea beetles, grasshoppers, Japanese beetle (adult), June beetle (adult) Masked chafer (adult) Southern corn borer, South-western corn borer, stalk borer, stink bugs, webworms.	Do not apply more than recommended amount [0.095 lb ai/A] in one growing season. Allow 21 days between applications.	1.68	4	0.022lb	X Packages /100 ft ²
Curcurbit Vegetables – Cantaloupes, Chayote, Chinese Wax gourd, Citron melon, Cucumber,	Armyworm, cabbage looper Colorado potato beetle, com earworm, cucumber beetles, cutworms, diamondback moth (larvae). Flea beetles, grasshoppers, green peach aphid, leafhoppers, leaf miners, melonworm, pickleworm,	Do not apply more than recommended amount [0.168 lb ai/A] in one growing season. Allow 3 days between applications Do not apply within 3 days of harvest.	2.13	6		X Packages /100 ft²

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Gherkin, gourds,
Momordica
species (balsom
apple, balsom
pear, bitter
melon, Chinese
cucumber)
muskmelon,
pumpkin, squash
watermelon

stinkbugs, tamished plant bug, tomato pinworm, vegetable weevil (adult) western plant bug, whitefly (adult)

Fruiting Vegetables -Eggplant groundcherry. pepinos, peppers, tomatillo, tomato

Aphids, armyworm, cabbage looper, Colorado potato beetle, cucumber, beetle, cutworms, diamondback moth, European corn borer flea beetles, imported cabbageworm, leafminers pepper weevil, stink bugs tarnished plant bug, thrips tomato fruitworm, (corn earworm), tomato pinworm, variegated cutworm, whitefly

Do not apply more than recommended amount [0.168 lb ai/A] in one growing season. Allow 5 days between applications. Do no apply within 1 day of harvest.

Do not apply more than

X Packages /100 ft²

Root Vegetables-Carrot, celeriac, Chervil (turnip Rooted), chicory

Armyworm, cabbage looper, Colorado potato beetle, cutworms, European corn borer, flea beetles, green peach aphid, leafhoppers,

lygus bug, (plant bug), pea aphid, Tarnished plant bug

recommended amount [0.14 ai/A] in one growing season Allow 3 days between applications. Do not apply within 3 days of harvest. Other than radishes, applications may not be made to root vegetables whose tops or leaves are to be harvested for human consumption.

2.13

0.028 lb X Packages /100 ft²

Tuberous & Corm Vegetables -

Potato, sweet potato arracacha, arrowroot, Chinese artichoke, Jerusalem artichoke, edible canna, bitter and sweet cassava, chayote, (root), chufa, dasheen, ginger, leren tanier, tumeric, yarn bean, true yam

Armyworm, cabbage looper, Colorado potato beetle, cutworms, European corn borer, flea beetles, green peach aphid, leafhoppers, lygus bug (plant bug), pea aphid, Tarnished plant bug

Do not apply more than recommended amount [0.14lb ai/A] in one growing season. Allow 3 days between applications. Do not apply within 3 days of harvest. Applications may not be made to tuberous or corm vegetables whose tops or leaves are to be harvested for human consumption.

2.13 0.0281bX Packages /100 ft²

USE DIRECTIONS FOR FIRE ANT TREATMENT

Imported Fire Ant Mound Treatment: Apply Hi-Yield® Kill-A-Bug® II Dust Containing Deltamethrin with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge of the mound). A second treatment may be necessary if complete control is not obtained. DO NOT DISTURB THE MOUND PRIOR TO APPLICATION. If possible, treat all colonies in the vicinity. Also, treat colonies which have not yet constructed a mound.

[Alternate directions - Evenly sprinkle one tablespoon (approximately 10 grams) of Hi-Yield® Kill-A-Bug® II Dust Containing Deltamethrin over the top of each mound. Do not water in or disturb the mound. Apply when temperatures are between 65 and 80°F. Allow 3 to 4 days for maximum control, then repeat as necessary. Do not use food utensils, such as teaspoon or measuring cups, for food after use with pesticides.]

STORAGE AND DISPOSAL

Storage: Store product in original container in a cool, dry locked place out of reach of children. Containers Disposal: *If empty*: Non-refillable container. Do not reuse this container. 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.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and limitations of Liability before using the product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Voluntary Purchasing Groups, Inc. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, VOLUNTARY PURCHASING GROUPS, INC. MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABLILTY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Voluntary Purchasing Groups, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Voluntary Purchasing Groups, Inc. disclaims any liabilities whatsoever for special, incidental, or consequential damages resulting from the use or handling of this product.

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Hi-Yield is a registered trademark of Voluntary Purchasing Groups, Inc.

[Alternate Front Panel Bullets:

- Long-Lasting
- For Use On Ornamentals
- Controls Many Different Insect Pests
- To Control Imported Fire Ants On Lawns Ants Other Residential Areas
- 8 Oz. Treats Up To 20 Fire Ant Mounds
- 2 Lbs. Treats Up To 80 Fire Ant Mounds
- Fast, Effective Kill Of Fire Ants
- Fast, Effective Kill Of Stinging Ants
- Contains Deltamethrin
- Contains Ultra Tec®]
- Denotes alternate text in addition to any subset of the directions for use.

Released For Shipment By: VOLUNTARY PURCHASING GROUPS, INC. P.O. BOX 460 BONHAM, TX 75418

> EPA Reg. No.7401-452 EPA Est. No. 7401-TX-1