

8329-61

03/14/2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Karen J. Larson
Regulatory Affairs Manager
Clarke Mosquito Control Products, Inc.
159 North Garden Avenue
Roselle, IL 60172

MAR 14 2007

Dear Ms. Larson,

Subject: Agency Initiated Action – PR Notice 2005-1 Product Labeling
Anvil 2 + 2 ULV
EPA Reg. No. 8329-61
Application dated January 18, 2007

The labeling referred to above, submitted in connection with registration under the Federal, Insecticide, Fungicide and Rodenticide Act is acceptable provided you make the following changes before releasing the product with the amended labeling for shipment:

1. Change "*Do not contaminate food, feed or drinking water. Do not allow spray treatments to drift onto pastureland, cropland, poultry ranges or potable water supplies.*" to

"Do not contaminate food, feed or drinking water. Do not allow spray treatments to drift onto pastureland, cropland, poultry ranges or potable water supplies. In treatment of corrals, feed lots, swine lots, and zoos, cover any exposed drinking water, drinking water fountains and animal feed before application."

2. In the environmental hazards statement add aquatic invertebrates. This addition will be required of all d-phenothrin mosquito adulticide products. The first sentence of the Environmental Hazards statement should be changed to read: "This pesticide is toxic to aquatic organisms, including fish and aquatic invertebrates."

3. First Aid Statements: As the subject product is a Category IV product, the addition of an "If Swallowed" first aid statement is not required. However, we advise you to consider adding this statement because the subject product contains petroleum distillates and includes the following statement: "Note to Physician: Product contains a petroleum distillate. Vomiting may cause aspiration pneumonia." Therefore, a physician or someone providing first aid may want

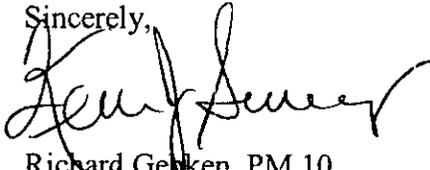
immediate advice on how to treat a patient that has swallowed a product containing petroleum distillates. EPA approved the voluntary addition of the following "If Swallowed" First Aid for similar d-phenothrin products in 2006:

- If Swallowed
 - Immediately call a poison control center or doctor.
 - Do not induce vomiting unless told to do 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 added, this statement should appear above the dermal contact first aid statement.

Please note that the availability of EPA's reregistration eligibility decision (RED) for products containing piperonyl butoxide was published in the FR on July 26 2006 (Vol. 71, No.43 pg 42389). Additional data or labeling changes may be required for products containing piperonyl butoxide.

A stamped copy of the label is enclosed for your records. Please submit two copies of the final printed labeling as soon as possible. If you any questions, please do not hesitate to contact Kevin Sweeney at (703) 305-5063. Thank you for your patience and cooperation in this matter.

Sincerely,

 Richard Geiken, PM 10
 Registration Division 7505P
 Insecticides Branch

Enclosure

[Company +brand logo]

CLARKE ANVIL® 2+2 ULV

Contains an Oil Soluble Synergized Synthetic Pyrethroid for Control of Adult Mosquitoes (Including Organophosphate-Resistant Species) Midges, and Black Flies in Outdoor Residential and Recreational Areas.

For use only by federal, state, tribal or local government officials responsible for public health or vector control, or by persons certified in the appropriate category or otherwise authorized by the state or tribal lead pesticide regulatory agency to perform adult mosquito control applications, or by persons under their direct supervision.

Active Ingredients	
3-Phenoxybenzyl-(1RS, 3RS; 1RS, 3SR)-2,2-dimethyl-3-(2-methylprop-1-enyl) cyclopropanecarboxylate *	2.00 %
Piperonyl Butoxide, Technical **	2.00 %
Other Ingredients ***	96.00 %
	100.00 %

Contains 0.15 pounds of Technical SUMITHRIN® /Gallon
and 0.15 pounds Technical Piperonyl Butoxide/Gallon

* Sumithrin®
** Equivalent to 1.60 % (butylcarbityl) (6-propylpiperonyl) ether and 0.40 % related compounds.
*** Contains petroleum distillate

**ACCEPTED
with COMMENTS
in EPA Letter Dated
MAR 14 2007**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
8329-61**

**CAUTION
KEEP OUT OF REACH OF CHILDREN**

Manufactured For
CLARKE MOSQUITO CONTROL PRODUCTS, INC.
159 N. GARDEN AVENUE
ROSELLE, ILLINOIS 60172

EPA Reg. No.: 8329-61
EPA Est. No.: _____

NET CONTENTS: _____
LOT NO.: _____

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.
Have product container or label with you when calling a poison control center or doctor, or going for treatment. For Medical Emergencies, call the International Poison Control Center at 1-800-214-7753.	
NOTE TO PHYSICIAN: Product contains a petroleum distillate. Vomiting may cause aspiration pneumonia.	

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

Caution. Harmful if absorbed through the skin. Do not induce vomiting because of aspiration pneumonia hazard. Avoid contact with skin, eyes, or clothing. In case of contact flush with plenty of water. Wash with soap and water after use. Obtain medical attention if irritation persists. Avoid contamination of food and feedstuffs.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Runoff from treated areas or deposition of spray droplets into a body of water may be hazardous to fish. Do not apply over bodies of water (lakes, rivers, permanent streams, natural ponds, commercial fish ponds, swamps, marshes or estuaries), except when necessary to target areas where adult mosquitoes are present, and weather conditions will facilitate movement of applied material beyond the body of water in order to

minimize incidental deposition into the water body. Do not contaminate bodies of water when disposing of equipment rinsate or wash waters.

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply to blooming crops or weeds when bees are actively visiting the treatment area, except when applications are made to prevent or control a threat to public and/or animal health determined by a state, tribal or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved by the state or tribe during a natural disaster recovery effort.

PHYSICAL OR CHEMICAL HAZARDS

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.

Before making the first application in a season, it is advisable to consult with the state or tribal agency with primary responsibility for pesticide regulation to determine if other regulatory requirements exist.

IN CALIFORNIA: This product is to be applied by County Health Department, State Department of Health Services, Mosquito and Vector Control or Mosquito Abatement District personnel only.

ANVIL® 2+2 ULV is recommended for use in mosquito adulticiding programs involving outdoor residential and recreational areas where adult mosquitoes are present in annoying numbers in vegetation surrounding parks, woodlands, swamps, marshes, overgrown areas and golf courses. For best results, apply when mosquitoes are most active and weather conditions are conducive to keeping the spray cloud close to the ground. Application in calm air conditions is to be avoided. Apply only when ground wind speed is greater than 1 mph. Air temperature should be greater than 50 °F when conducting all types of applications.

Do not treat a site with more than 0.0036 pounds of Sumithrin® per acre in a twenty-four hour period. Do not exceed 1.0 pounds of Sumithrin® per acre in any site in any year. More frequent applications may be made to prevent or control a threat to public and/or animal health determined by a state, tribal, or local health or vector control agency on the basis of documented evidence of disease causing agents in vector mosquitoes or the occurrence of mosquito-borne disease in animal or human populations, or if specifically approved by the state or tribe during a natural disaster recovery effort.

Do not apply to or allow spray treatments to drift onto pastureland, cropland, poultry ranges or potable water supplies. Do not contaminate food, feed or drinking water.

ANVIL® 2+2 ULV cannot be diluted in water. Dilute this product with light mineral oil if dilution is preferred.

SPRAY DROPLET SIZE DETERMINATION

Ground-based Application: Spray equipment must be adjusted so that the volume median diameter (VMD) is between 8 and 30 microns ($8 \mu m \leq D_v 0.5 \leq 30 \mu m$) and that 90% of the spray is contained in droplets smaller than 50 microns ($D_v 0.9 < 50 \mu m$). Directions from the equipment manufacturer or vendor, pesticide registrant, or a test facility using a laser-based measurement instrument must be used to adjust equipment to produce acceptable droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rate(s) are properly calibrated.

Aerial Application: Spray equipment must be adjusted so that the volume median diameter produced is less than 60 microns ($D_v 0.5 < 60 \mu m$) and that 90% of the spray is contained in droplets smaller than 100 microns ($D_v 0.9 < 100 \mu m$). The effects of flight speed and, for non-rotary nozzles, nozzle angle on the droplet size spectrum must be considered. Directions from the equipment manufacturer or vendor, pesticide registrant, or a test facility using a wind tunnel and laser-based measurement instrument must be used to adjust equipment to produce acceptable

droplet size spectra. Application equipment must be tested at least annually to confirm that pressure at the nozzle and nozzle flow rate(s) are properly calibrated.

GROUND ULV APPLICATION

Apply ANVIL® 2+2 ULV through a standard ULV cold aerosol or non-thermal aerosol (cold fog) generator. Consult the following table for examples of various dosage rates using a swath width of 300 feet for acreage calculations.

Dosage Rate (Lbs. Sumithrin®/acre)	Fl. oz. Anvil 2+2 ULV per Acre	Flow Rates in fluid oz./minute at truck speeds of:			
		5 MPH	10 MPH	15 MPH	20 MPH
0.0036	3.0	9.3	18.6	27.9	37.2
0.0024	2.0	6.2	12.4	18.6	24.8
0.0012	1.0	3.1	6.2	9.3	12.4

ANVIL® 2+2 ULV may also be applied undiluted with non-thermal, portable, motorized backpack equipment adjusted to deliver ULV particles of 50 to 100 microns VMD. Use 1.0 to 3.0 fl. oz. of the undiluted spray per acre (equal to 0.0012 to 0.0036 lb. A.I./Acre) as a 50 ft (15.2 m) swath while walking at a speed of 2 mph (3.2 kph).

ANVIL® 2+2 ULV may be applied through truck mounted thermal fogging equipment. Do not exceed the maximum rates listed above. May be applied at speeds of 5 to 20 mph. To reduce oil requirement and sludge buildup in equipment, use 100-second viscosity mineral "fog" oil. For use with hand carried foggers, use same rates of active ingredient per acre. Do not wet foliage since oil base formulations may be phytotoxic. Use a clean, well-maintained and properly calibrated fogger. Fog downwind.

AERIAL APPLICATION

ANVIL® 2+2 ULV may be applied at rates of 1.0 to 3.0 fluid ounces ANVIL® 2+2 ULV per acre by fixed wing or rotary aircraft equipped with suitable ULV application equipment. Aerial application should be made at altitudes ranging from 75 to 300 feet.

Dosage Rate Lbs. Sumithrin®/acre	Flow Rate in fluid oz./acre ANVIL® 2+2 ULV
0.0036	3.0
0.0024	2.0
0.0012	1.0

PROHIBITION ON AERIAL USE: Not for aerial application in Florida unless specifically authorized by the Bureau of Entomology, Florida Department of Agriculture and Consumer Services.

STORAGE & DISPOSAL

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

STORAGE: Store in a cool, dry place. Keep container closed.

CONTAINER DISPOSAL: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

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

IN CASE OF MEDICAL EMERGENCY,
CALL THE INTERNATIONAL POISON CONTROL CENTER, 1-800-214-7753
IN CASE OF TRANSPORTATION EMERGENCY, CALL INFO-TRAC 1-800-553-5053

FOR MORE INFORMATION CALL: 1-800-323-5727

NOTICE: To the extent provided by law, seller makes no warranty, expressed or implied concerning the use of this product other than as indicated on the label. Buyer assumes all risk of use and/or handling of this material when use and/or handling is contrary to label instructions.

ANVIL® is a Registered Trademark of Clarke Mosquito Control Products, Inc.
SUMITHRIN® is a Registered Trademark of Sumitomo Chemical Company, Ltd.