

10308-3

6/14/2011

1 of 3



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 14, 2011

Mr. Robin Todd, PhD
Agent for Sumitomo Chemical Company, LTD
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

**Subject: Amended Reregistration Label for Pynamin Forte® Technical
EPA Registration No. 10308-3**

Dear Dr. Todd:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the referenced product in connection with the **ALLETHRINS RED**, and have concluded that your submission is acceptable with the following label revision provision(s):

General Comment(s):

Revise the Signal word from WARNING to CAUTION based on the toxicity profile.

First Aid section comment(s):

You may delete the "IF ON SKIN OR CLOTHING" section. The toxicity category for Acute Inhalation and Primary Dermal was Category IV and it is a non-sensitizer.

Hazards to Humans and Domestic Animals section comment(s):

Replace this section with **CAUTION**: Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

PLEASE NOTE: This product is not being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Within 45 days of the date of this letter, you must submit an updated label incorporating all of the above changes. If we do not receive an amended label in response to this letter, this registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this letter, please contact Linda A. DeLuiSe at 703.305.5428 or via e-mail at deluise.linda@epa.gov.

Sincerely Yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosures: Label stamped "Accepted with Comments"
Acute Toxicity Review: Dated December 1, 2010
Product Chemistry Review: dated November 2, 2010



PYNAMIN FORTE® TECHNICAL

For Formulation Of Insecticides Only



PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

WARNING

May be fatal if swallowed or inhaled. Harmful if in eyes or absorbed through skin. Do not breathe vapor. Avoid contact with skin or eyes. Wear a mask or pesticide respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse.

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates. 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 local State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

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

FOR FORMULATION OF INSECTICIDES ONLY

Formulators using this product are fully responsible for obtaining EPA registrations for their formulated products.

Only for formulation into an insecticide for: Domestic Indoor (household), Domestic Outdoor (localized treatments only including total release foggers, space, spot and crack and crevice sprays), Commercial/Industrial/Institutional Uses (as a space, general surface, spot and crack and crevice application) and Greenhouse Ornamentals.

Not for formulation into end-use products with directions for use as an application directly to pets.

Formulation into ready-to-use total release foggers with directions for use outdoors is limited to a maximum of 1.5 ounces of product per container.

Formulation into products with directions for use as a spot treatment in residential settings is limited to a maximum 0.25% a.i. dilution strength.

Formulations with greater than 0.1% a.i. dilution strength must contain directions for use limiting applications in indoor residential settings to spot treatments only. Indoor broadcast use must be prohibited.

Formulation into products with directions for use as a broadcast spray outdoors is prohibited. Outdoor use is limited to spot treatments only. (NOTE: outdoor broadcast use with ready-to-use total release foggers is permitted.)

Not for formulation into products for use in or on drainage systems, golf course turf, airports/landing fields, uncultivated agricultural areas, boat/ship hulls and paved areas such as sidewalks and roads.

This product may be used to formulate products for specific uses(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such uses(s).

ACTIVE INGREDIENT:

d-cis/trans allethrin*: (dl)-3-allyl-2-methyl-4-oxo-2-cyclopentene-1-(o)-cis/trans chrysanthemate

OTHER INGREDIENTS:

*d-isomer 95% min.
Trans isomer 75% min.

COMMENTS
EPA Letter Dec 11 2004
100.00%
JUN 14 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act
Approved for the product
10308-3

KEEP OUT OF REACH OF CHILDREN
WARNING

See Side Panel For Additional Precautionary Statements

FIRST AID

If Swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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. You may also contact 1-800-858-7378 (National Pesticide Information Center) for emergency medical treatment information.

STORAGE AND DISPOSAL

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

Pesticide Storage And Spill Procedures: Store upright in a cool, dry place. Keep container closed. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

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

Container Disposal: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying.

[containers 5 gallons or less] Triple rinse as follows: Empty the remaining contents into mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with solvent used to formulate the end-use-product and recap. Shake for 10 seconds. Pour rinsate into 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.

[containers over 5 gallons] Triple rinse as follows: Empty the remaining contents into mix tank. Fill the container 1/4 full with solvent used to formulate the end-use-product. 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 mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

NOTICE - READ CAREFULLY

CONDITIONS OF SALE: Sumitomo (and seller) offer(s) this product for sale subject to, and buyer and all users are deemed to have accepted, the following conditions of sale and warranty which may only be varied by written agreement of a duly authorized representative of Sumitomo.

WARRANTY LIMITATION: Sumitomo warrants that this product conforms to the chemical description in the directions for use on the label subject to inherent risks referred to below. To the extent consistent with applicable law, Sumitomo makes no other express warranties. To the extent consistent with applicable law, THERE IS NO IMPLIED WARRANTY OF MERCHANTABILITY and there are no warranties which extend beyond the description of the label hereof.

INHERENT RISKS: The directions for use of this product are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks associated with use. To the extent consistent with applicable law, buyer assumes all risks associated with use or application of this product contrary to label instructions or resulting from extraordinary weather conditions.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Sumitomo shall not be liable for special, indirect or consequential damages resulting from the use or handling of this product and no claim of any kind shall be greater in amount than the purchase price of the product in respect of which such damages are claimed.

02-0958/R1

3043