



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 10, 2006

Robin G. Todd, PhD
Technical Advisor
Sumitomo Chemical Company, Ltd.
Insect Control & Research, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228

Subject: Amendment: To add domestic outdoor use on exterior surfaces of buildings
Pralle MUP (EPA Reg. No. 10308-24)
Application dated February 18, 2005

Dear Dr. Todd:

The above referenced labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the following comments:

- Revise the sentence under "Limit of Liability" to read "To the extent allowed by applicable law, Sumitomo shall not be liable for etc.

The additional ecological effects and environmental fate studies submitted have been reviewed. The avian acute oral and honey bee acute contact studies were found acceptable. The results of the avian acute oral indicate that the active ingredient is non-toxic to northern bobwhite on an acute oral basis. The honey bee study indicates that the active ingredient is highly toxic to honey bees on an acute contact basis. End use products proposed for outdoor use will require a bee toxicity statement and precaution on the label. The aerobic soil metabolism and soil adsorption/desorption studies contained a number of deficiencies and are considered only supplemental, and not satisfying the guideline requirements. Refer to the attached environmental fate assessment for a more detailed discussion.

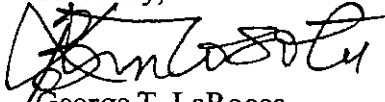
Based on the limited proposed domestic outdoor uses (i.e., on exterior surfaces of buildings), significant exposure of aquatic and terrestrial organisms is not anticipated and no additional ecological effects and environmental fate and data are being requested at this time. However, these data are in reserve pending additional proposed uses that may result in increased outdoor exposure to wildlife and the environment. Refer to Tables 1 and 2 in the Agency's risk assessment for status of specific studies.

Based on the above review of data, the environmental hazard statement for end use products containing imiprothrin for outdoor use will have to be added or amended. This pertains to the S.C. Johnson & Sons, Inc. labels submitted as examples of outdoor uses. S. C. Johnson & Son, Inc. will need to submit an amendment to support the label expansion indicated on the submitted label. We suggest you inform them of this requirement.

Please submit two copies of the revised final printed label to the Agency prior to the release of this product for shipment. See enclosed copy of the stamped label for your record.

If you have any questions please contact Dr. B.A. Akinlosotu at (703) 605-0653.

Sincerely,



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

Enclosure

**ACCEPTED
with COMMENTS
in EPA Letter Dated:
JUL 10 2006**

PRALLE® Manufacturing Use Product

PRECAUTIONARY STATEMENTS Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 10308-24

CAUTION

Harmful if swallowed or inhaled. Harmful if absorbed through skin and eyes. Do not breathe the vapor and avoid getting on skin or in eyes. Remove and wash contaminated clothing before reuse. Anyone handling this product should wash themselves thoroughly with soap and water before eating, drinking or smoking.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this pesticide 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 U. S. Environmental Protection Agency.

STORAGE AND DISPOSAL

1. **STORAGE**
Containers should be stored in a cool, dry, well-ventilated area. Keep containers closed when not in use.
2. **PESTICIDE DISPOSAL**
Do not contaminate water, food, or feed by storage or disposal. Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.
3. **CONTAINER DISPOSAL**
Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

ACTIVE INGREDIENT:
[2,5-Dioxo-3-(2-propynyl)-1-imidazolidinyl] methyl (1RS)-cis-trans-chrysanthemate.....50.5%

INERT INGREDIENTS..... 49.5%
TOTAL..... 100.0%

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

| FIRST AID | |
|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IF SWALLOWED | <ul style="list-style-type: none"> •Call 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 mouth-to-mouth, if possible •Call a poison control center or doctor for further treatment advice |
| IF IN EYES | <ul style="list-style-type: none"> •Hold eye(s) 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(s). •Call a poison control center or doctor for 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. |
| Have the product container or label with you when contacting a poison control center or doctor, or when going for treatment. | |

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Refer to Technical Information for formulation of PRALLE® MUP for end uses. PRALLE® MUP is intended only for formulation into products for:

1. control of crawling insects by crack & crevice and spot treatment indoors and outdoors on exterior surfaces of buildings
2. uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator had submitted in support of registration; and
3. uses for experimental purposes that are in compliance with U.S. EPA requirements.

Formulators who use this product are responsible for providing data to support their own registrations.

**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 LIMITATIONS:

Sumitomo warrants that this product conforms to the chemical description in the directions for use on the label subject to the inherent risks referred to below. Sumitomo makes no other express warranties. 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. Buyer assumes all risks associated with use or application of this product contrary to label instructions or resulting from extraordinary weather conditions.

LIMIT OF LIABILITY:

In no case shall Sumitomo 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.

4.2 lb Active Ingredient/Gallon; An Insecticide for Formulating Use Only

EPA Registration No. 10308-24
EPA Establishment No. 10308-JP-04

SUMITOMO CHEMICAL COMPANY, LTD
5-33 Kitahama, 4-chome, Chuo-ku
Osaka 541-8550, JAPAN

Net Contents Liters Gal. Lot No.

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