

21165-30

4/3/2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

April 3, 2001

Pyranha, Inc.  
c/o Marla K. Jackson  
Brazos Associates, Inc.  
2001 Diamond Ridge Drive  
Carrollton, Texas 75010-4509

Subject: Revise Labels per PR Notice 2001-1  
Pyranha Space Spray 1-10 HPS Concentrate / EPA Reg. No. 21165-30  
Pyranha Insecticides Equine Spray and Wipe / EPA Reg. No. 21165-33  
Aqueous Equine Formulation / EPA Reg. No. 21165-34  
Pyranha Insecticides Equine Spray and Wipe Concentrate Water Based  
Formulation/ EPA Reg. No. 21165-33  
Your Applications Dated December 4, 2000

Dear Ms. Jackson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

Your First Aid Statements are acceptable with the exception that you must include the following statement in its entirety (you did not have the complete statement):

**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-xxx-xxxx for emergency medical treatment information.

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**With regard to EPA Reg. No. 21165-30:**

- 1) Per our letter of October 4, 1989, please add the statement "Do not use this product in or on electrical equipment due to the possibility of shock hazard" under a section entitled "Physical and Chemical Hazards".
- 2) Please specify how long the treatment areas should be ventilated for in your statement of "Treatment areas should be thoroughly ventilated prior to reentry by personnel".
- 3) Delete all "Repeat treatment/Retreat as necessary" - type statements and state the minimum allowable time period between applications. This should be based on your efficacy data.
- 4) Please submit or cite (with MRID numbers) efficacy data for fleas and bot flies. These pests were not on the label when you submitted (under the cite-all method of support) your product for registration in 1987.

**With regard to EPA Reg. No. 21165-33**

- 1) Per our correspondence of March 22, 1993, Please add the following statement to your Directions For Use: "Not for Use on Horses Intended For Human Consumption".

**With regard to EPA Reg. No. 21165-34**

- 1) In our February 1992 correspondence we did not allow a deer tick claim to be added to the label because the efficacy data you submitted was found unacceptable. Please remove all claims to the control/kill of deer ticks and references to Lyme disease or submit or cite (with MRID numbers) data to substantiate these claims. Additionally, please submit or cite (with MRID numbers) efficacy data for fleas, ticks, and bot flies. These pests were not on the original label which was submitted (under the cite-all method of support) with your product for registration in 1987.

**With regard to EPA Reg. No. 21165-39**

- 1) Please delete "ants and roaches" from your label since these are not considered equine pests.

- 2) Per our comment of October 2, 1989. Please remove "bot flies" from the label since we have no data of control of this pest with this formulation. Alternatively you may submit or cite (with MRID numbers) efficacy data to substantiate this claim.

If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

*Tracy Lynn Keigwin*  
for George T. LaRocca  
Product Manager (13)  
Insecticide Branch  
Registration Division (7505C)

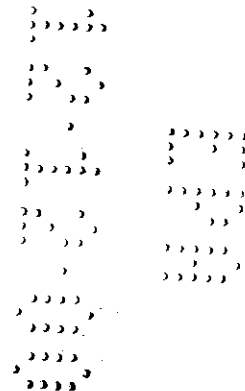


**[FRONT LABEL PANEL CON'T]**

If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If inhaled	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>

**See Back/Side Label Panel for Additional Precautionary Statements**

**Net Contents \_\_\_\_\_**



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[BACK/SIDE LABEL PANEL]

**Effectively Kills & Repels: House flies, Stable flies, Horse flies, Fruit flies, Black flies, Deer flies, Horn flies, Mosquitoes, Gnats, Biting and Non-biting Midges, Bot flies, Face flies and fleas.**

**Quick Knockdown and Effective Control**

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Do not treat areas where food crops are growing. Personnel should vacate containment areas (i.e. horse barns, dog kennels) to be treated while treatment is in progress. Treatment areas should be thoroughly ventilated prior to re-entry by personnel. Do not use in commercial food/feed handling establishments, restaurants, or other areas where food is commercially prepared or processed.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to fish and other aquatic organisms. Drift or runoff may adversely affect fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

**DIRECTIONS FOR USE**

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

**DILUTION/USE RATE**

Dilute before using. When used as a space spray and ultra low volume spray, dilute by adding 1 part of this product to 11 parts of clean water. Mix thoroughly prior to application. Repeat treatments as necessary to maintain control.

**WHERE TO USE**

Use as a space spray in horse barns\*, dog kennels and zoo animal quarters.

Use as an outdoor area spray for temporary reduction of listed insects on and around homes, patios, tennis courts, pool areas, beach houses and lawn areas.

**\*Do not apply this product to horses intended for slaughter or human consumption. Do not apply this product in horse barns (stables) where horses intended for slaughter or human consumption will be maintained.**

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[BACK/SIDE LABEL PANEL]

**APPLICATION DIRECTIONS**

To apply as a space spray, use mechanical (Non-Thermal) spray equipment such as Pyranha Automatic Space Spray System. Adjust nozzles to deliver a fine mist to the entire treatment area at a rate of 1 ounce diluted product per 1,000 cubic feet of area.

When used as an ultra low volume spray to outdoor area sites, apply the diluted product at a rate of 6 to 12 fl.oz. per 1,000 sq.ft. of area. This product may be applied with non-thermal application equipment including portable back pack sprayers, vehicle mounted non-thermal ULV equipment, LECO ULV Cold Aerosol Generator, Microgen, Curtis, London Aire or other application equipment designed for ULV aerosol generation. Direct the diluted spray into tall grass, shrubbery and around lawns where these pests may hover or rest. Apply when the air is still and avoid wetting foliage. Do not apply when wind speeds exceed 10 mph. Do not apply directly to open water. Do not apply within 100 feet of lakes and streams. Do not allow spray treatments to drift to ornamental ponds, pasture lands, cropland, poultry ranges, or water supplies. Repeat treatments as necessary to maintain control of nuisance pests.

**STORAGE AND DISPOSAL**

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

**Storage:** Keep in a cool, dry area preferably locked and away from children and pets. Do not store below 32°F (0°C). 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:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

MANUFACTURED EXCLUSIVELY FOR

PYRANHA, INC.

6602 Cunningham Road

Houston, TX 77041

832-467-3840

800-231-2966

EPA Reg. No. 21165-30

EPA Est. No. 44446-TX-1