



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 17 2006

Marla K. Jackson  
Agent for Pyranha Inc.  
Brazos Associates, Inc.  
2001 Diamond Ridge Dr.  
Carrollton, TX 75010

Subject: Amendment-Clarify Outdoor Use Directions, Add Use in Outdoor Misting System  
Pyranha Space Spray 1-10 HP Concentrate  
EPA Reg. No. 21165-32  
Your application dated March 16, 2006

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.

1. Under Indoor Space Sprays you make reference to spray equipment such as Automatic space spray systems. Are there other systems besides the Pyranha System? If not delete "such as". If there are other systems or application equipment used then these must be identified on the label with instructions for use. Also add a referral statement to the label regarding the Pyranha equipment and operation manual.
2. Add the following precaution to the third paragraph under Indoor Spray Space "Automatic spraying systems must not be programmed to release pesticide where feed is directly exposed."
3. Under Outdoor Sprays delete the first sentence in the second paragraph and replace with the heading:  
  
"Directions for Use in Outdoor Residential Misting Systems"
4. Add a statement to the second paragraph under Outdoor Sprays identifying the spray droplet size to be used with the spray equipment i.e.

“Spray equipment must be adjusted so that the volume median diameter is greater than 20 microns ( $Dv\ 0.57 > 20\ \mu m$ ) and that 90% of the spray is contained in droplets larger than 50 microns ( $Dv\ 0.9 > 50\ \mu m$ )”

5. Change “should” to “must” in the statement beginning “A rain sensor and wind sensor should be.....etc.”
6. Revise the statement beginning, “The system reservoir tank....etc. to read “If used in a system with a reservoir tank for the end use dilution the system reservoir tank must be locked. Securely attach the end use pesticide (product name) label and a dilution statement to the system reservoir tank in a weather protected area or plastic sleeve. The dilution statement must be phased as follows: The container holds \_\_\_\_\_ parts (product name) to \_\_\_\_\_ parts water.”
7. Add the following instructions under residential misting system: “If used in a direct injection system the pesticide container must be locked. Securely attach the end use pesticide (product name) label to the pesticide container in a weather protected area or plastic sleeve.”
8. This product may only be used in systems that have been calibrated to apply no more than the maximum application rate of 0.25 grams per 1000 cubic feet per day. Also express this maximum application rate as lbs or gallons of end use product formulation. Thus revise the second paragraph under Outdoor sprays to meet the conditions.
9. As indicated in paragraph 1 above is there an equipment or operations manual describing how to use/setup the automatic outdoor misting system? If so please submit this manual for review. A referral statement informing the user of such a manual must also be listed on the label.

Please note that a notice of availability of EPA’s reregistration eligibility document (RED) for products containing permethrin was published in the FR on June 28, 2006 (Vol 71 No. 124 pg. 36788). Additional data and/or labeling changes may be required for products containing permethrin.

If you have any questions in regard to this letter please feel free to contact me at 703-305-6100.

Sincerely,



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

Enclosure

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[FRONT MASTER LABEL PANEL]

# Pyranha

## Space Spray

### 1-10 HP Concentrate

[by

Pyranha

*"Your Trusted Leader in Insect Control"*]

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

*Quick Knockdown and Effective Control.*

*[For Indoor][and][or][Outdoor Areas as Listed]*

Recommended for Commercial/Industrial Use Only

**ACTIVE INGREDIENTS:**

Pyrethins: .....	0.55%
*Piperonyl Butoxide, Technical: .....	5.50%
**Permethrin: (3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate .....	1.10%
<b>INERT INGREDIENTS:</b> .....	<u>92.85%</u>
<b>TOTAL:</b> .....	100.00%

\*Equivalent to 4.4% (butylcarbityl)(6-propylpiperonyl) ether and 1.1% related compounds.  
\*\*Cis/trans ratio: Max. 65% (+/-) trans and min. 35% (+/-) cis.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

**FIRST AID**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-231-2966 for medical treatment information.

**ACCEPTED**

**with COMMENTS**

**In EPA Letter Dated:**

JUL 17 2006

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

21165-39

If swallowed	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
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 MASTER 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, Bott flies, Face flies and fleas.*

*Quick Knockdown and Effective Control.*

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS & 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.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. 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.

**STORAGE & 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.

**Dilution/Use Rate ([Indoor Space][and][or][Outdoor Sprays]) :** Dilute before using. Add 1 part of this product to 21 parts of clean water. Mix thoroughly prior to application. Repeat treatments only as necessary to maintain control.

[BACK/SIDE MASTER LABEL PANEL CONT'D]

**INDOOR SPACE SPRAYS -**

**Where to Use:** Use as an indoor space spray in horse barns†, dog kennels, and zoo animal quarters to kill and repel listed insects.

Personnel should vacate containment treatment areas (horse barns, dog kennels & zoo animal quarters) while treatment is in progress. Treated 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.

Apply as a space spray using mechanical (Non-Thermal) spray equipment such as automatic space spray systems. Adjust spray nozzles to deliver a fine mist or fog to entire treatment area at a rate of 1 fluid ounce diluted product per 1000 cubic feet of area.

**†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.**

**OUTDOOR SPRAYS -**

**Where to Use:** 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.

Can be applied as an area spray using mechanical (Non-Thermal) spray equipment such as automatic space spray systems. Adjust spray nozzles to deliver a fine mist or fog at a delivery rate not to exceed 1.25 fluid ounces of diluted product per minute with each nozzle covering 100 square feet (approximately 1000 cubic feet). Do not exceed 5 fluid ounces per nozzle per 100 square feet per day.

Automatic spray systems must be programmed so as not to activate and/or release when people, pets and food or feed are present. A rain sensor and a wind sensor should be installed on the system to control drift and runoff. The system reservoir tank should be locked and a legible copy of the label securely attached to the system reservoir tank, or on the outside of the system timer.

Direct nozzles to spray towards the target area and away from swimming pools, water bodies, or eating and cooking areas. Do not use in an evaporative cooling system. During the day, manually activate and deactivate the automatic spray system 30 minutes to an hour before outdoor activity is planned.

Installers and service technicians must comply with the license, certification, or registration requirements of the state(s), tribe(s), or local authority(ies) where they are installed.

**[BACK/SIDE MASTER LABEL PANEL CONT'D]**

[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 backpack 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 or automatic ULV spraying systems. Repeat treatments as necessary to maintain control of pests. When using hand or vehicle mounted equipment, 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. Do not treat areas where food crops are growing. Repeat treatments after 1- hour, only as necessary to maintain control.]

MANUFACTURED EXCLUSIVELY FOR  
PYRANHA, INC.  
6602 Cunningham Road  
Houston, TX 77041  
832-467-3840      800-231-2966

EPA Reg. No. 21165-32  
EPA Est. No. 44446-TX-1

*{Note to Reviewer: Text included in [ ] indicates optional text that may or may not be used on the actual market label.}*

REVISED: 3-13-06  
S:\Main\Pyranha, Inc.\Labels\Pyranha 1-10 HP Concentrate Master Label