

21165-39

4-3-2001

1/7



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.

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

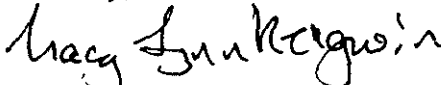
- 1) Please delete "ants and roaches" from your label since these are not considered equine pests.

3/7

- 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,


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

4/7

[FRONT LABEL PANEL]

Pyranha INSECTICIDES

EQUINE SPRAY AND WIPE CONCENTRATE WATER BASED FORMULATION

ACCEPTED
WHS COMMENTS
in EPA Letter Dated

APR - 3 2001

ACTIVE INGREDIENTS:

- Pyrethrins 0.300%
- *Piperonyl Butoxide, Technical 3.000%
- **†Permethrin 0.600%

INERT INGREDIENTS: 96.100%

TOTAL: 100.00%

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

21165-39

*Equivalent to 2.4% (butylcarbityl)(6-propylpiperonyl) ether
and to 0.6% of related compounds

** (3-phenoxyphenyl) methyl (±) cis/trans 3-(2,2-dichloroethenyl)
2,2-dimethylcyclopropanecarboxylate

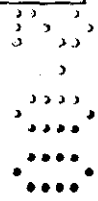
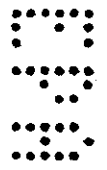
†cis/trans ratio: min. 35% (±) cis and max. 65% (±) trans

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.

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 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.

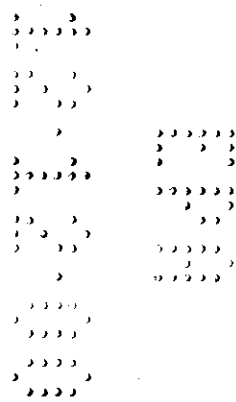


[FRONT LABEL PANEL CON'T]

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.

See Back/Side Label Panel for Additional Precautionary Statements

Net Contents _____



6/7

[BACK/SIDE LABEL PANEL]

KILLS AND REPELS

- STABLE FLIES
- HORSE FLIES
- FACE FLIES
- DEER FLIES
- HOUSE FLIES
- HORN FLIES
- MOSQUITOES
- GNATS
- TICKS
- FLEAS
- CHIGGERS
- ANTS
- ROACHES

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: For animal use only. Not for human use. 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. Avoid contamination of food and foodstuffs. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not apply directly to any body of water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

PHYSICAL AND 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.

Not for use on horses intended for human consumption.

Must be diluted before using. Use clean water. Add Pyranha Equine Spray and Wipe Concentrate to water and mix well.

DILUTION

Dilute by adding one (1) part concentrate to five (5) parts potable water.

USE

FOR USE ON HORSES.

This non-oily insecticide/repellant may be applied with a trigger spray applicator, or as a wipe. Kills and repels horse flies, stable flies, horn flies, house flies, face flies, deer flies, bot flies, mosquitoes, fleas, gnats, lice and ticks.

7/7

[BACK/SIDE LABEL PANEL]

DIRECTIONS FOR WIPE-ON USE: Thoroughly brush horse to remove excess dirt and dust. Extremely dirty horses should be shampooed, rinsed and allowed to dry before applying wipe. Use a sponge or clean soft cloth or mitt. Apply Equine Formulation liberally over areas to be protected. Pay special attention to legs, belly, shoulders, neck and facial areas. Avoid eyes and mucous membrane.

DIRECTIONS FOR TRIGGER SPRAY USE: Remove excess dirt and dust. Apply light spray mist to coat while brushing lightly against lay of the hair. Avoid spray in eyes and mucous membranes. Apply with sponge or soft cloth to those areas.

TO KILL AND REPEL FLYING INSECTS: Spray in areas where insects congregate. Direct spray to contact insects for rapid knockdown and kill. Spray around outside of door facings, screens to render area unattractive to insects. This helps to repel insects and prevent entrance into building.

<p>STORAGE AND DISPOSAL</p> <p>Do not contaminate water, food or feed by storage or disposal.</p> <p>Storage: Store in a cool, dry place. Do not store near heat or open flame.</p> <p>Disposal: Securely wrap original container in several layers of newspaper and discard in trash.</p> <p>Container Disposal: Do not reuse empty container. Wrap container and put in trash.</p>
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MANUFACTURED EXCLUSIVELY FOR
PYRANHA, INC.
 6602 Cunningham Road
 Houston, TX 77041
 832-467-3840 800-231-2966

EPA Reg. No. 21165-39
 EPA Est. No. 44446-TX-1

