



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 14, 2011

Ms. Rebecca M. Horton,
Consultant/Agent for
PHAETON CORPORATION
c/o Registrations by Design, Inc.
P.O. Box 1019
Salem, VA 24153-1019

Subject: Amended Labeling; Response to EPA Guidance Entitled "Required Label Language for Indoor Total Release Fogger Products," dated March 23, 2010; and "Update on Required Label Language for Indoor Total Release Fogger Products," dated July 6, 2011
UNICORN® HOME FOGGER, EPA Reg. No. 28293-161
Your Submission Dated September 12, 2011

Dear Ms. Horton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following label revision provision(s):

General Comment(s):

1. In accordance with the Agency's guidance documents entitled "Required Label Language for Indoor Total Release Fogger (TRF) Products," dated March 23, 2010, and "Update On Required Label Language for Indoor Total Release Fogger Products," dated July 6, 2011, please consider the following regarding the subject product:
 - Avoid multipacks for consumer use
 - Adopt smaller unit sizes (*e.g.*, 2 oz. versus the standard 6 oz.)
 - Utilize a time-delayed release mechanism (3-5 seconds)
 - Switch to non-flammable propellants

Ingredient Statement section comment(s), page 1 of 6:

2. Revise the listing of "Permethrin*" to read "Permethrin**"
3. Revise the listing of "**OTHER INGREDIENTS:**" to read "**OTHER INGREDIENTS***:**"
4. Insert the following text as a 3rd footnote at the end of this section: "***Contains petroleum distillates"
5. In order to maintain consistency throughout this section, revise "100.000%" to read "100.00%"

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s), page 2 of 6:

6. Insert the following text immediately preceding the 1st sentence within this subsection: "Contains Petroleum Distillates."

Directions for Use section comment(s), pages 2-4 of 6:

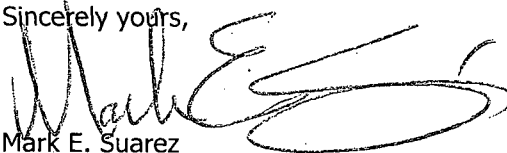
7. To facilitate inclusion of required label language from the Agency's letters entitled "Required Label Language for Indoor Total Release Fogger Products," dated March 23, 2010, and "Update on Required Label Language for Indoor Total Release Fogger Products," dated July 6, 2011, you must:

- Revise the subsection heading "General Precautions and Restrictions" to read "**USE RESTRICTIONS**"
- Within the "**To Use This Product Correctly:**" subsection, revise the 2nd sentence to read "Do not use in small confined areas (e.g., a room 5ft. x 5 ft. or smaller). Instead, allow fog to enter from other rooms."
- The statement starting with "Use of a fogger in an enclosed ..." must be **bolded** for added prominence.
- Insert the following statement immediately following the last sentence within the 2nd paragraph of the "**Before You Fog:**" subsection: "Immediately before activating canister, complete the door hang-tag by filling in the time & date to instruct family and other people with access to the treated area (premises) not to enter for at least two (2) hours following the time of activation. Hang the tag on the door to the entrance."

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Within 10 working days of the date of this letter, you must submit an updated master label as an amendment to effectively incorporate all of the required total release fogger mitigation language. If we do not receive an amended master label in response to this letter, the Agency may pursue further regulatory action, including cancellation in accordance with section 6(e) of FIFRA.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Mark E. Suarez
Product Manager (13)
Insecticide Branch
Registration Division (7504P)

Enclosure:
028293-00161 D457970

Copy of label stamped "Accepted with Comments"

ACCEPTED
With COMMENTS
In EPA Letter Dated:

December 14, 2011

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

UNICORN® HOME FOGGER

28293-161

Optional Marketing Statements:

Kills Ants, Cockroaches, Confused Flour Beetles, Crickets, Firebrats, Fleas, Flies,
Mosquitoes, Pillbugs, Rice Weevils, Saw-toothed Grain Beetles, Silverfish, Small Flying
Moths, Ticks and Yellow Mealworms.

Kills Fleas, Cockroaches, Ants, Flies, Mosquitoes, Ticks and similar insects.

Also Kills Brown Dog Ticks, Deer Ticks and other Ixodid species that may carry or transmit
Lyme Disease

For Use in Rooms, Apartments, Homes, Attics, Basements, Campers, Boats, Household
Storage Areas, Garages, Pet Sleeping Areas, Cabins, Enclosed Porches, Condominiums,
Dormitories.

- One [2 oz] unit treats a room up to 16' x 16' with an 8' ceiling [or 2,000 cu. ft.].
- One [3 oz] unit treats a room up to 20' x 20' with an 8' ceiling [or 3,000 cu. ft.].
- One [4 oz] unit treats a room up to 22' x 22' with an 8' ceiling [or 4,000 cu. ft.].
- One [5 oz] unit treats a room up to 25' x 25' with an 8' ceiling [or 5,000 cu. ft.].
- One [6 oz] unit treats a room up to 27' x 27' with an 8' ceiling [or 6,000 cu. ft.].

Water-Based Insecticide

ACTIVE INGREDIENTS:

Pyrethrins	0.05%
N-Octyl bicycloheptene dicarboximide*	0.38%
Permethrin*	0.40%

OTHER INGREDIENTS:	<u>99.17%</u>
TOTAL	100.000%

*MGK® 264 Insecticide Synergist

***Cis/trans* ratio: Min. 35% (+/-) *cis* and max. 65% (+/-) *trans*

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back/side/other panel(s) for additional Precautionary Statements & First Aid.

NET WEIGHT: _____

FIRST AID	
If Swallowed	Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or a doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.
If In Eyes	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.
If On Skin or Clothing	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 Inhaled	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then given artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [xxx-xxx-xxxx] [the National Pesticide Information Center at 800-858-7378] for emergency medical treatment information.	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Breathing spray mist may be harmful. Avoid inhalation of vapor or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause fire or explosion if not used properly. Follow the "Directions for Use" on this label carefully.



Highly Flammable Ingredient
Ingrediente Altamente Inflamable

DIRECTIONS FOR USE

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

SHAKE WELL BEFORE USE. KEEP CONTAINER UPRIGHT.

General Precautions and Restrictions

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Application is prohibited directly into sewers or drains, or to any area like a gutter

where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

For Use in Rooms, Apartments, Homes, Attics, Basements, Campers, Boats, Household Storage Areas, Garages, Pet Sleeping Areas, Cabins, Enclosed Porches, Condominiums, Dormitories. **Does not control bed bugs.**

One 6 ounce canister fogger will treat a room up to 27' x 27' with an 8 foot ceiling. [One 5 ounce canister fogger will treat a room up to 25' x 25' with an 8 foot ceiling or 5000 cubic feet.] [One 4 ounce canister fogger will treat a room up to 22' x 22' with an 8 foot ceiling or 4000 cubic feet.] [One 3 ounce canister fogger will treat a room up to 20' x 20' with an 8 foot ceiling or 3000 cubic feet.][One 2 ounce canister fogger will treat a room up to 16' x 16' with an 8 foot ceiling or 2000 cubic feet.]

To Use This Product Correctly:



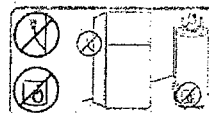
Do not use more than one fogger per room. Do not use in a room 5 ft. x 5 ft. or smaller; instead, allow fog to enter from other rooms.



Do not use in small, enclosed spaces such as closets, cabinets or under counters or tables. Use of a fogger in an enclosed space may cause the product to explode, resulting in injury to people or damage to property.



Turn off ALL ignition sources such as pilot lights (shut off gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.). Call your gas utility or management company if you need assistance with your pilot lights.



Before You Fog

Open cupboards, cabinets, trunks and doors to area to be treated to allow maximum kill in all areas where insects can hide and breed. Close outside doors and windows and shut off fans and air conditioning to maximize killing power of fog.



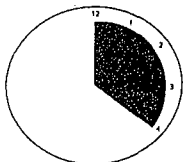
Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use. Cover waxed wood floors and waxed furniture in the immediate area surrounding the fogger (newspaper may be used). Cover or remove plants.

Remove pets, birds, and cover fish bowls and aquariums before spraying. Remove poultry before treating poultry houses.

To Start Fogging

SHAKE WELL JUST BEFORE USING. Place a section of newspaper on floor in center of room to be treated. **NOTE:** Do not place fogger on water-stainable surface. Tilt can opening away from face and depress tab firmly with thumb until it clicks in locked position. Aiming spray away from face, set fogger on newspaper. **Vacate the treated house, individual apartment unit, or other structure immediately.** Fill out and place hang-tag on the door to the treated area to alert family and others with access to the treated area not to enter for 4 hours (30 minutes for flying insects).

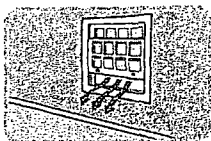
Do Not Re-enter



Close door and keep area closed for 4 hours (30 minutes for flying insects) before airing out.

For 4 Hours.

Airing Out



Do not allow adults, children, or pets to enter until vapors, mists, and aerosols have dispersed, and the treated area has been thoroughly ventilated. Then open windows, vents and doors for two hours. If an odor is still detected additional ventilation is required.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a cool, dry area inaccessible to children and pets and away from heat, sparks or open flame.

Pesticide Disposal & Container Handling: Do not puncture or incinerate!

If empty –Place in trash or offer for recycling if available. *If partly filled* – Call your local solid waste agency or for disposal instructions.

To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning this use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this product when such use and/or handling is contrary to label instructions.

Phaeton Corporation
P.O. Box 290, Madison, GA 30650

[Lot No. added at production.]

[Note to EPA: Spanish translation to be completed on label approval by Agency.]

MGK® - registered trademark of McLaughlin Gormley King Company

Door Knob Hang Tag to be provided at the point-of-sale:

FRONT:

<p>DO NOT ENTER UNTIL</p> <p>_____</p> <p>(insert time)</p> <p>ON</p> <p>_____</p> <p>(insert date)</p>

BACK:

Fill out and place hang-tag on the door to the treated area to alert family and others with access to the treated area not to enter for 4 hours (30 minutes for flying insects).