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Mr. Robert Grimes
 HPI, Inc.
 P.O. Box 14
 St. Joseph, MO 64502

Dear Mr. Grimes:

Subject: Amendment - Add Commercial-Use Limitation Statement
 HPI Insecticide Emulsifiable Concentrate 13.3%
 EPA Registration No. 44616-21
 Your Application Dated September 22, 1988

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling.

1. Use in food-handling establishments can imply use in U.S. Department of Agriculture (USDA) Meat and Poultry Plants. Therefore, either add the statement "Not for Use in USDA Meat and Poultry Plants," or submit an application to USDA requesting use in these areas. If granted you can then indicate on the label that the product can be used in these areas.
2. Under the Statement of Practical Treatment section, insert the heading "IF INHALED" before "Remove victim to fresh air" Note: In order to facilitate consumer reference, the individual headings under the Statement of Practical Treatment section are usually aligned to the same margin and run vertically on the

57441:I;LeMaster:LR-14;KENCO:06/20/89;08/01/89;CL;GJ;VO:CL;VO;EK

CONCURRENCES

SYMBOL							
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label. Alternatively, to conserve space, you may include these statements in paragraph form provided you capitalize the statements IF SWALLOWED, IF IN EYES, etc.

3. Change "Active Ingredients" to the singular.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

HP INSECTICIDE EMULSIFIABLE CONCENTRATE

CRAWLING INSECT SPRAY

AN INSECTICIDE OFFERING RESIDUAL KILL OF CRAWLING INSECTS FOR UP TO 4 WEEKS

Contains 1 lb/gal (120 g/L) of Pramex® Insecticide

ACTIVE INGREDIENTS:

*†•Permethrin (3-phenoxyphenyl)methyl (±) Cis, trans-3-(2,2-dichloro-ethenyl)-2,2-dimethylcyclopropanecarboxylate 13.30%w/w

INERT INGREDIENTS: 86.70%

100.00%w/w

*Cis/trans isomers ratio: min. 35%(±)cis and max. 65%(±)trans.
 †U.S. Patent No. 4,824,163
 •Penick-Sie UCLAF's Pramex® brand of permethrin insecticide.
 Penick-Sie UCLAF Corp., 400 Sylvan Avenue, Englewood Cliffs, N.J. 07632

PRECAUCION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
(TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.) Recommended for Commercial/Industrial Use.

**KEEP OUT OF REACH OF CHILDREN
 WARNING**

SEE SIDE PANEL FOR ADDITIONAL
 PRECAUTIONARY STATEMENTS AND
 STATEMENT OF PRACTICAL TREATMENT

**PRECAUTIONARY STATEMENT
 HAZARDS TO HUMANS & DOMESTIC ANIMALS
 WARNING**

Causes eye irritation. Do not get in eyes. Avoid contact with skin. Do not swallow. Avoid breathing vapor. Wash thoroughly after handling areas. Wear goggles or face shield when mixing, handling, or applying. Use a pesticide respirator jointly approved by the Mine Safety and Health Administration, the National Institute for Occupational Safety and Health, and the American Society of Safety Engineers (30 CFR Part 11).

STATEMENT OF PRACTICAL TREATMENT

If swallowed Call a physician or Poison Control Center. Do not induce vomiting. If product contains aromatic petroleum solvent, Aspiration may occur. Move to fresh air. Apply artificial respiration if indicated. If in eyes: Flush with plenty of water. Get medical attention. If on skin: Wash with soap and plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not contaminate streams, rivers, or equipment wastewaters. Do not apply directly to water. Application rates specified on this label.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame. Flashpoint: 100°F (38°C).

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with the label directions.

STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Store product in original container in a locked area. **WASTE DISPOSAL:** Pesticide wastes are toxic. Improper disposal, especially by pouring or mixing with household waste, is a violation of Federal Law. If this product is to be disposed of according to label instructions, contact your State Pesticide Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** For Containers One Gallon and Larger: Wrap container and put in trash. For Containers One Gallon and Smaller: Empty container (or equivalent). Then offer for recycling or reconditioning, or incineration, or by other procedures approved by State and Local authorities.

EPA Est.: 44616-MD-1
 EPA Reg. No. 44616-21

ACCEPTED with COMMENTS
 in EPA Letter Dated:
 JUN 26 1988

NET CONTENTS: 1 Gallon (128 fl. oz.)
 LOT NO.:

ACCEPTED with COMMENTS
 in EPA Letter Dated:
 AUG 15 1988

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 44616-21



17 So. 4th St. St. Joseph, MO 64501

Directions For Use (Continued on next page)

FOR USE IN NON-FOOD AREAS INDOORS AND OUTSIDE PREMISES OF HOTELS, MOTELS, HOMES, PRESCHOOLS, NURSERIES, DAY CAMPS, GREENHOUSES, LATHHOUSES, SEED HOUSES, FOOD HANDLING ESTABLISHMENTS, PACKAGING AND PROCESSING PLANTS, COMMERCIAL, INDUSTRIAL, OFFICE, INSTITUTIONAL AND STORAGE BUILDINGS, DAIRIES, MILK STORAGE ROOMS, EGG PROCESSING PLANTS, SUPERMARKETS, RESTAURANTS, BOTTLING PLANTS, CAFETERIAS, FLOUR AND FEED MILLS, BAKERIES, AND HOSPITALS IN HOSPITALS, PATIENTS SHOULD BE REMOVED PRIOR TO TREATMENT. ALSO FOR USE IN CAMPERS, MOBILE HOMES, BUSES, AUTOMOBILES, TRUCKS, AND BOXCARS. ALSO FOR USE IN DOG KENNELS AND HORSE STABLES. IN HORSE STABLES, NOT FOR APPLICATION IF HORSES WILL BE USED FOR FOOD.

DO NOT USE IN THE FOOD/FEED AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS, RESTAURANTS OR OTHER AREAS WHERE FOOD IS COMMERCIALY PREPARED OR PROCESSED. DO NOT USE IN SERVING AREAS WHILE FOOD IS EXPOSED OR WHILE FACILITY IS IN OPERATION (SERVING AREAS ARE FACILITIES WHERE PREPARED FOODS ARE SERVED, SUCH AS DINING ROOMS, BUT EXCLUDING AREAS WHERE FOODS MAY BE PREPARED OR HELD).

EXAMPLES OF NONFOOD AREAS IN FOOD/FEED HANDLING ESTABLISHMENTS INCLUDES GARBAGE ROOMS, LAVATORIES, FLOOR DRAINS (TO SEWERS) ENTRIES, VESTIBULES, OFFICES, LOCKER ROOMS, MACHINE ROOMS, BOILER ROOMS, CLOSETS, MOP CLOSETS AND STORAGE (AFTER CANNING OR BOTTLING).

For contact and residual sprays, mix PRAMEX with water in the following manner:

FINISHED SPRAY	PRAMEX EC (fluid ounces)	WATER
0.25%	2-2/3 (79 ml)	1 gallon (3.78 L)
0.25%	2/3 (20 ml)	1 quart (0.95 L)
0.50%	5-1/2 (163 ml)	1 gallon (3.78 L)
0.50%	1-1/3 (39 ml)	1 quart (0.95 L)

For heavy infestations, use the 0.50% dilution. For lighter infestations and for maintenance purposes, use the 0.25% dilution.

PEST INDOORS

For residual and contact control of cockroaches (waterbugs), silverfish (firebrats), clover mites, millipedes, centipedes, earwigs, sowbugs (pillbugs), spiders, brown dog ticks, lone star ticks, ants, fire ants, clothes moths, carpet beetles, fleas, boxelder bugs, scorpions, spider beetles, bed bugs, grasshoppers, house flies, mosquitoes, gnats, fruit flies, cluster flies, flying moths, confused flour beetles, saw-toothed grain beetles, shiny spider beetles, grain mites, red flour beetles, angoumois grain moths, grain weevils, Indian meal moths, Mediterranean flour moths, lesser grain borers, cigarette beetles, drug store beetles, chocolate moths. Spray thoroughly into hiding places such as cracks, crevices, moist areas, openings around doors and sinks, under refrigerators, heat pads and storage areas.

INSTRUCTIONS FOR USE (CONTINUED)

For Bedbugs: Apply as a spot treatment to cracks and crevices, around baseboards, floorboards, bedboards and walls. First, thoroughly clean and air mattresses and springs. Then spot treat only areas that may harbor bedbugs, concentrating on tufts, folds and seams. Repeat as necessary. For persistent infestations, consult professional applicator.

Grain Insects: To control confused flour beetles, saw-toothed grain beetles, spider beetles, shiny spider beetles, grain mites, red flour beetles, angoumois grain moths, grain weevils, Indian meal moths, Mediterranean flour moths, lesser grain borers, cigarette beetles, drug store beetles, chocolate moths, carpet beetles - remove infested grain, cereal or flour and destroy. Avoid contamination of other food and foodstuffs in the area by removing before spraying. Spray directly on exposed stages and into cracks and crevices where grain insects may be hiding. In homes, dispose of all infested products. The shelves and drawers should be cleaned and thoroughly sprayed so as to contact all pests, and covered with shelf paper after allowing shelves to dry. Any utensils that are contacted with spray should be washed before using. Repeat as necessary.

Spiders: Spray directly on these pests and use repeated applications to the webbing and all cracks and crevices which harbor spiders.

Ants (including Fire Ants): To kill ants, spray trails, nests and points of entry within buildings and homes. Spray directly on ants where possible. Repeat as necessary.

Wasps, Hornets, Yellow Jackets, Bees: Application should be made in the late evening when insects are at rest. Spray liberally into hiding and breeding places, especially under attic rafters, contacting as many insects as possible. Repeat as necessary.

Fleas, Brown Dog and Lone Star Ticks on Dogs, Cats, and Premises: Spray animals along back, under forelegs and on other areas, except scrotum, face and anus. Part hair to contact skin and insure good coverage. Hold sprayer about one foot (30 cm) away while spraying. Apply until hair is thoroughly moist. Do not spray directly in eyes, mouth or nose of animal. To prevent reinfestation, thoroughly spray the animals' bedding and other resting areas until the surface is slightly moist contacting as many insects as possible. Treat the floor areas, cracks and crevices in the floor and along baseboards at the rate of 2 seconds per linear foot (30 cm) at a distance of 12 to 18 inches (30-45 cm). Also spray the entire inside surface of dog houses.

House Flies, Mosquitoes, Cluster Flies, Gnats, Fruit Flies, Flying Moths: Close off all doors and windows. Point sprayer upward. Direct spray mist to all parts of the room, especially windows and other light sources which may attract these insects. Fill the room with mist, then leave the treated area. Keep the room closed for at least 15 minutes. Ventilate the room when treatment is complete.

Carpet Beetles and Clothes Moths: To kill, use a container 14-18 inches (36-46 cm) from ceiling, spray evenly, covering the entire surface until all undersides of carpet when possible. Avoid wetting of draperies, Blankets, Carpets and Other Storage: Dry clean or wash before treatment. Apply spray evenly, covering the material or slightly moist. For best results, place treated bags after drying, and store in a dark place. At baseboards, closets, cracks, crevices, infested and/or wherever these insects are seen or suspected.

Pests on Outside Surfaces of Buildings: To control ants, clover mites, crickets, earwig, sowbugs (pillbugs) on the outside surfaces of prevent infestation of buildings, treat the building height of 2 to 3 feet (0.5 to 1 m), where pests enter. Also, apply as a residual spray to other buildings, including porches, screens, wind patios, garages, refuse dumps, and other areas where pests congregate or have been seen. Repeat treatment to maintain effectiveness.

House Flies, Mosquitoes, Cluster Flies, Gnats: For outdoor use only as an aid in reducing these insects. Spray outside surfaces of window frames or wherever these insects may enter. Also treat surfaces around light fixtures on porches and other places where these insects might be seen. Repeat as necessary.

Ants, Lone Star Ticks, Crickets, Fleas, and Earwigs: For treatment of localized infestations of these pests in areas where there are weeds or bushy non-infested areas thoroughly. For ants, thorough runways. Repeat application as infestations reinfestations occur.

Wasps, Hornets Yellow Jackets, Bees: Application should be made in late evening when insects are at rest. Spray openings in ground, bushes, and in cracks or crevices which may harbor nests, saturating nest openings with many insects as possible.

TO CONTROL FIRE ANTS: Dilute 2 tablespoonfuls of product in 1 gallon (3.78 L) of water. Apply 1/2 cup solution as a gentle rain to each fire ant mound. Thoroughly wet the mound and surround it with a diameter (1.22 m) For best results, apply in cool (18.5-27°C), or in early morning or late evening. Do not disturb the mounds or their appearance. Do not disturb the treatment. If possible, treat all mounds in the vicinity. Colonies which may not as yet have constructed larger quantities of solution can be prepared for treatments. Equipment to deliver the diluted product at the rate of 1 gallon (3.78 L) per mound is not use equipment that produces a great deal of pressure. Pressurized sprays may disturb the ants and reducing product effectiveness.

WARRANTY STATEMENT

Our recommendations for the use of this product are believed to be reliable. The use of this product is the control of the manufacturer, no guarantee is implied, is made as to the effects of such or other products if used in accordance with the label.