



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® IGR TOTAL RELEASE FOGGER, EPA Reg. No. 28293-214
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 all instances throughout the subject label, revise the incorrect typographical listing of the registration number for this product "EPA Reg. No. 28293-14" to read "EPA Reg. No. 28293-214."
2. 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

Optional Marketing Statements section comment(s):

3. Revise the 16th optional marketing statement to read "Kills [stops (prevents)] stages of fleas that don't look like fleas."

Directions for Use section comment(s), pages 4-6 of 7:

4. 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:
028293-00214 D457971

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:

28293-214

UNICORN® IGR TOTAL RELEASE FOGGER

Optional Marketing Statements:

Total Release Fogger for Fleas with NYLAR® Insect Growth Regulator
 Kills Adult and Preadult Fleas.
 Prevents Reinfestation for 7 Months [210 Days] [30 weeks]
 One Unit (6 oz) Treats Up to 6,000 Cubic Feet of unobstructed space (27 x 27 x 8)
 Water-based
 An insect growth regulator similar to the naturally occurring insect growth hormones which interferes (stops) their growth and development.
 Stops (prevents) the flea from developing into egg laying adults.
 Can be used as part of an integrated pest management program.
 Can be a biorational approach to insect control
 Keeps working in areas exposed to the sun.
 Prevents fleas from developing into the biting adult stage.
 Stops (prevents) hatching fleas [preadult (larval) fleas] [hatching eggs (larvae)] from becoming full grown [developing into] biting adults.
 One treatment works for [210 days] [30 weeks] [7 months] against hatching fleas [preadult (larval) fleas] [hatching eggs (larvae)].
 Kills present (today's) fleas and prevents new (tomorrow's) fleas from growing up to bite.
 Activity keeps working for [210 days] [30 weeks] [7 months].
 Controls [stops (kills)(prevents)] stages of fleas that don't look like fleas.
 Prevents [stops] the emergence of adult fleas.
 Flea eggs deposited on treated areas will not develop into adult fleas.
 Larvae crawling onto treated areas will not develop into adult fleas.
 Acts on the immature life stage of the flea, preventing it from developing into biting adults.
 Kills cockroaches, ticks, spiders, ants, and other listed insects.
 Also kills Deer Ticks and other Ixodid species that may carry and transmit Lyme Disease.
 Effective long term control.

ACTIVE INGREDIENTS:

2-[1-Methyl-2-(4-phenoxyphenoxy) ethoxy] pyridine	0.10%
Pyrethrins	0.05%
N-Octyl bicycloheptene dicarboximide*	0.38%
Permethrin**	0.40%

OTHER INGREDIENTS:.....99.07%

TOTAL.....100.00%

*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 doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.
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.
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 absorbed through skin. Breathing spray mist may be harmful. Avoid inhalation of vapor or spray mist. Avoid contact with skin, eyes or clothing. 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

NYLAR®, an insect growth regulator, is similar to growth hormones that occur naturally in insects. It inhibits development of the immature stages of the flea for [210 days][30 weeks][7 months], preventing them from reaching the biting adult stage.

This product contains a combination of three insecticides that stops [blocks (interrupts) (terminates)] the flea life cycle in three ways and controls other listed insects. The first insecticide is NYLAR®, an insect growth regulator that will not allow the flea to reproduce thereby providing long term (residual) control. The second insecticide is the botanical Pyrethrum, (an extract of a Chrysanthemum flower), which provides effective, quick-kill of insects upon direct contact and an added benefit of flushing the insects from their hiding place to aid in a more complete control (kill). Permethrin, the third active insecticide, provides activity until NYLAR® takes effect.

This product contains a combination of ingredients that kills both adult and hatching fleas [preadult (larval) fleas][hatching eggs (larvae)]. Kills hatching fleas [preadult (larval) fleas][hatching eggs (larvae)] before they grow up to bite. The insect growth regulator in this product continues to kill (control) hatching fleas [preadult (larval) fleas][hatching eggs (larvae)] for [210 days][30 weeks][7 months] by preventing their development into adults. The product reaches fleas [and other listed insects] hidden in carpets, rugs, drapes, upholstery, pet bedding, floor cracks and open cabinets. Occasionally adult fleas may be present in treated areas when reintroduced from infested animals.

To protect your pet against and to minimize the reintroduction of adult fleas from outdoors, use EPA registered flea and tick products, in conjunction with this application and prior to re-entry. As part of a complete flea control program use an EPA registered outdoor spray.

Kills [controls] insects [on contact] [such as]:

Cockroaches [adults](nymphs)]	Warehouse Beetle	Wood Borer (exposed)
Smokey Brown Cockroach [adults](nymphs)]	Red Flour Beetle	Fleas [adults (larvae) (eggs)(preadult)]
Brown Banded Cockroach [adults](nymphs)]	Grain Mite	Ticks [that may carry and transmit Lyme Disease]
Asian Cockroach [adults](nymphs)]	Cheesemite	Brown Dog Ticks
German Cockroach [adults](nymphs)]	Sowbugs	Lone Star Ticks
American Cockroach [adults](nymphs)]	Millipedes	Deer Tick
Australian Cockroach [adults](nymphs)]	Beetles	Other Ixodid species
Waterbugs [adults](nymphs)]	Ground Beetles	American Dog Tick
Palmetto Bugs [adults](nymphs)]	Elm Leaf Beetle	Gulf Coast Tick
Dermeestids [Carpet Beetles (Trogoderma)]	Boxelder Bug	Flying Moths (small)
Foraging Ants [Fire Ants][Pharaoh Ants]	Earwigs	Almond Moth
Carpenter Ants [Easter (Western)]	Lice	Chocolate Moth
Granary Insects	Pillbugs	Tobacco Moth
Flat Grain Beetle	Clover Mites	Indian Meal Moth
Cadelle	Centipedes	Indian Mealworm
Rice Weevil	Midge	Angoumois Grain Moth
Flour Beetle	Flies	Hornets
Cigarette Beetle	Gnats	Carpenter Bees
Drugstore Beetle	Cluster Fly	Wasps
Lesser Grain Borer	Mosquito	Yellowjackets
Merchant Grain Beetle	Sciarid Fly	[Eastern stages]
Sawtoothed Grain Beetle	Firebrat	(Western)]
Grain Weevil	Silverfish	
	Booklice	
	Bedbug	

For use in: Apartments, Attics, Basements, Boats, Cabins, Campers, Closed Porches, Condominiums, Dormitories, Drive-Ins, Drugstores, Factories, Food Plants, Garages, Homes, Hospitals, Hotels, Institutions, Kennels, Kitchens, Motels, Nursing Homes, Office Buildings, Other Public Buildings, Pet Grooming Parlors, Pet Sleeping Areas, Railroad Cars, Restaurants, Rooms, Schools, Ships, Storage Areas, Supermarkets, Theaters, Treehouses, Trucks, Verandas, Warehouses, and Zoos.

DIRECTIONS FOR USE

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

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.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held. Commercial food/feed areas where the product cannot be used include areas for receiving, serving, storage (dry, cold, frozen, raw), packaging (cleaning, slicing, cooking, grinding), edible waste storage, enclosed processing systems (mills, dairies, edible oils, syrups). Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Not for use in USDA meat and poultry plants.

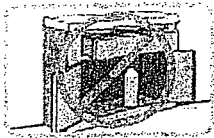
For use in apartments, attics, basements, boats, cabins, campers, closed barns, condominiums, day camps, dormitories, drive-ins, drugstores, factories, food plants, garages, homes, horse stables, household storage areas, kennels, pet sleeping areas, poultry houses, rooms, greenhouses (noncommercial), enclosed porches, ship cabins, lathouses, seed houses, tents, washrooms, and the non-food/feed areas of schools, theaters, trucks, warehouses, boxcars, hospitals, hotels, industrial plants, motels and preschools. **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:



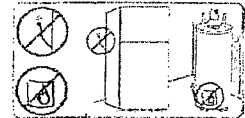
Do not use more than one fogger per room. Do not use in a room 5 ft. x 5 ft. or smaller; instead, allow fog to enter from other rooms.



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.

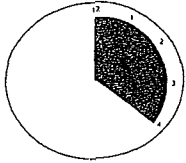
Remove pets, birds, and cover fish bowls and aquariums before spraying. Remove poultry before treating poultry houses.

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,

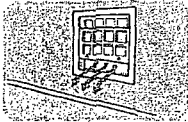
set fogger on newspaper. **Vacate the treated house, individual apartment unit, or other structure immediately.** Fill out and place hang-tag on the door to the treated area to alert family and others with access to the treated area not to enter for 4 hours (30 minutes for flying insects).

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® and NYLAR® - registered trademarks of McLaughlin Gormley King Company

EPA Reg. No. 28293-14
Nov. 10, 2011 – revised

EPA Est. No. _____
Page 6 of 7 Pages

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

FRONT:

DO NOT ENTER UNTIL

(insert time)
ON

(insert date)

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).