



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 1, 2025

James McFadden  
Director, Regulatory Affairs  
Phaeton Corp, dba Unicorn Laboratories  
1501 East Woodfield Road, Suite 200 West  
Schaumburg, Illinois 60173

Subject: Label Amendment - Registration Review Mitigation for Permethrin and Tetramethrin  
Product Name: Unicorn Crawling Insect Killer II  
EPA Registration Number: 28293- 287  
Application Dates: 12/29/2020  
Decision Numbers: 569299; 597426  
Case Numbers: 00474860

Dear James McFadden:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Permethrin and Tetramethrin Interim Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Carolyn Smith via email at [smith.carolyn@epa.gov](mailto:smith.carolyn@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Jaclyn Pyne". The signature is written in a cursive, flowing style.

Jaclyn Pyne, Team Leader  
Risk Management and Implementation Branch 3  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

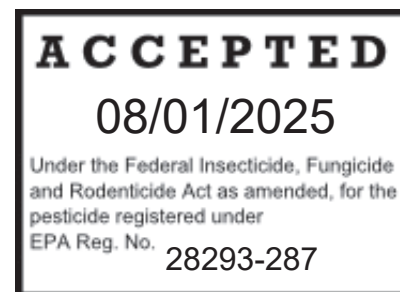
ENCLOSURE: Stamped label

<b>TETRAMETHRIN</b>	<b>GROUP</b>	<b>3A</b>	<b>INSECTICIDE</b>
<b>PERMETHRIN</b>	<b>GROUP</b>	<b>3A</b>	<b>INSECTICIDE</b>

## UNICORN CRAWLING INSECT KILLER II

### Optional Marketing Statements:

For Household Use  
 Contains Synergist Piperonyl Butoxide, Permethrin and Tetramethrin  
 Provides Quick Killing Action and Residual Control  
 Economical Do-it-Yourself Pest Control  
 Use Indoors and Outdoors  
 Kills Fleas, Roaches, Ants  
 Kills on Contact – Kills Fast  
 Kills Hidden Bugs  
 Kills Bugs You See and Even the Ones Your Don't See  
 A Broad Spectrum Insecticide Highly Effective Against Ants, Bees, Carpenter Ants, Carpet Beetles, Centipedes, Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Flour Beetles, Grain Beetles, Ground Beetles, Millipedes, Mole Crickets, Moths, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders, Ticks, and Many Other Crawling Insects.  
 No Oily Residue  
 No Unpleasant Odor  
 Protects for Up to 4 Weeks  
 Water-Based Formula; Non-Staining  
 Contains No CFCs or Other Ozone Depleting Substances. Federal Regulations Prohibit CFC Propellants in Aerosols.



### ACTIVE INGREDIENTS:

Tetramethrin.....	0.10%
Permethrin* .....	0.25%
Piperonyl Butoxide** .....	0.50%
<b>OTHER INGREDIENTS:</b> .....	<u>99.15%</u>
	100.00%

\*Cis/trans ratio: Min. 35% (±) cis and Max. 65% (±) trans.

\*\* (butylcarbityl) (6-propylpiperonyl) ether and related compounds.

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

**See side/back panel for Additional Precautionary Statements and First Aid**

EPA Reg. No. 28293-287

EPA Est. No. \_\_\_\_\_

**NET WEIGHT:**

FIRST AID	
<b>If on Skin or Clothing:</b>	<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>
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:** Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before re-use.

### Environmental Hazards

This pesticide is extremely toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to or near water. Drift and runoff may be hazardous to fish in water adjacent to treated areas. Do not contaminate water when disposing of equipment, washwater or rinsate. See Directions for Use for additional precautions and requirements. This pesticide 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.

### 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. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

## DIRECTIONS FOR USE

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

For both Indoor and Outdoor Use.

Shake Well Before Use.

### Use Restrictions

Do not use in commercial food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed.

Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. Remove pets, birds, and cover fish aquariums before spraying. Do not allow adults, children, or pets to enter the treated area until sprays have dried. Remove exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.

Do not allow to enter indoor or outdoor drains. *No permita la entrada a desagües internos o externos.* 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 wet articles to point of runoff or drip. Do not use treated articles until sprays have dried. Not for use as a broadcast spray on indoor residential surfaces. Treat surfaces to ensure thorough coverage but avoid runoff. To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants.

**Surface Spray Application:** Remove protective cap, hold container upright and direct spray away from face. Hold can 12-15 inches from surface being sprayed. Press valve down and spray as directed. Spray surface until slightly wet (at a rate of 4 ounces product to treat approximately 25 square feet of surface area).

**Crack and Crevice Injection:** Remove protective cap, hold container upright and attach injection tube for injecting into cracks and crevices where insects may be hiding, living and breeding. Place injection tip ½ inch into cracks, crevices, holes and other small openings where insects may be a problem. Release a one-second spray per spot. In serious infestations, if possible, place spots approximately 12 inches apart. In light infestations or for preventative treatment, place spots approximately three feet apart. In long running cracks, move the injector tip along the crack while spraying. Move at the rate of one linear foot per second in heavy infestations and three feet per second in light infestations. See the additional directions below for effective control of specified insects.

## INDOORS

Cockroaches (including adult and immature stages of both non-resistant and organophosphate and carbamate resistant strains), Ants, Booklice, Boxelder Bugs, Centipedes, Crickets, Dermestids, Firebrats, Fleas, Palmetto Bugs, Silverfish, Sowbugs, Ticks and Waterbugs: Apply thoroughly to all areas where these pests crawl and hide, especially in cracks and crevices, and hidden surfaces around sinks and storage areas, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, bookcases, and similar areas. When pests are driven out, spray directly. Repeat as necessary.

**ANTS:** Spray around ant trails, doors and windows and other places where ants enter premises. Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray freely on and around debris. Repeat as necessary.

**CARPENTER ANTS:** For effective control, locate and treat nests and surrounding areas. Apply around doors, and windows and other places where ants enter premises and where they crawl and hide. Spray into infested wood through existing openings.

**BROWN DOG TICKS and FLEAS in Buildings:** Apply in infested areas such as pet beds and resting quarters, nearby cracks and crevices, under the edges of rugs and floor coverings, between and under cushions of upholstered furniture and other areas where these pests may be

present. Remove any untreated old pet bedding and replace with clean fresh bedding after treatment of pet areas. Do not use directly on pets.

**SPIDERS:** Apply along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

**CENTIPEDES, EARWIGS, GROUND BEETLES, MILLIPEDES, MOLE CRICKETS, PILLBUGS, SOWBUGS, SCORPIONS, and TICKS:** Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

**PANTRY PESTS – Grain Beetles (Rusty, Merchant, and Saw-toothed), Flour Beetles (Red and Confused), Chocolate Moths, Cigarette beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths:** Treat exposed stages. Remove all foodstuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices, behind and under cupboards and cabinets. Allow spray to dry prior to replacement of shelf paper, food and utensils.

**CARPET BEETLES (Black, Furniture and Varied):** Spray on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

**WEBBING CLOTHES MOTHS:** Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on clothes. Do not apply to clothing.

## OUTDOORS

Do not apply to the point of runoff. Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours). Rainfall within 24 hours after application may cause unintended runoff of pesticide application. Do not wet plants to point of runoff or drip. All outdoor application must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

1. Application to pervious surfaces such as soil, lawn, turf, and other vegetation;
2. Perimeter band treatments of 7 feet wide or less from the base of a man-made structure to pervious surfaces (e.g., soil, mulch, or lawn);
3. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
4. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
5. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level;
6. Applications to vertical surfaces directly above pervious surfaces, such as soil, lawn, turf, mulch or other vegetation) only if the pervious surface does not drain into ditches, storm drains, gutters, or surface waters

Spot treatments must not exceed two square feet in size (for example, 2ft. by 1 ft or 4 ft. by 0.5 ft.).

For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds. Do not spray the product into fish pools, ponds, streams, or lakes. Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Spray with wind if breeze is blowing.

**PESTS ON OUTSIDE SURFACES OF BUILDINGS:** For control of building infestation due to Ants, Clover Mites, Crickets, Earwigs, Millipedes, and Sowbugs (Pillbugs). Spray foundation of building where insects are active and may find entrance up to a height of 2 feet. Apply as a residual spray to outside surfaces of buildings where insects tend to congregate. Spray areas include (but are not limited to) screens, window frames, eaves, porches, patios, garages and refuse dumps. Repeat treatment as necessary.

**CRAWLING INSECTS:** Ants, Cockroaches (including Asian Cockroaches), Crickets, Centipedes, and Silverfish. Spray infested surface of patio or picnic area, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control.

**ANTS, LONE STAR TICKS, DOG TICKS, CRICKETS, FLEAS AND EARWIGS:** Apply thoroughly to infestation in bushes, grass or weeds. For Ants: spray round ant trails and hills.

**FIRE ANTS:** To treat mounds, use soil injector. To maximize spray distribution, insert injector into the mound full length if possible. Inject the mound at 3-6 sites at a rate of 5-10 seconds spray per site. For very large mounds (over 36 inches in diameter), increase the number of injection sites. Space injection sites in a circular pattern on the mound surface with one site in the center. To quiet active ants on mound surface, sweep surface with spray for a distance of 18 inches. For best results, apply in cool weather or in early morning or late evening hours. Treat new mounds as they appear.

#### **STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Do not store near heat or open flame. Store in cool dry area away from children.

**CONTAINER DISPOSAL:** Do Not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Do not pour or dispose down-the-drain or sewer. Call your local solid waste Agency for local disposal options.

**NOTICE:** To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

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