

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 17, 2020

Dr. James McFadden Director, Regulatory Affairs Phaeton Corporation 1501 East Woodfield Road Suite 200 West Schaumburg, Illinois 60173

Subject: Label Amendment – Multiple label changes & data matrix updates

Product Name: Deltamethrin Dust EPA Registration Number: 28293-322

Application Date: 11/20/2018 Decision Number: 546736

Dear Dr. McFadden:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. 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 18 months from the date of this letter. After 18 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.

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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Jamey Shuler at (703) 347-8036 or by email at Shuler.Jamey@epa.gov.

Id Herrick

Sincerely,

Jacquelyn Herrick, Product Manager 03 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

DELTAMETHRIN DUST

{NOTE TO REVIEWER [] Indicates alternate or optional wording. {} Indicates notes to Reviewer that will not appear on the final label}

For [Indoor] [Outdoor] Residential Use Only

ACTIVE INGREDIENT:

 Deltamethrin
 0.05%

 OTHER [INERT] INGREDIENTS:
 99.95%

 Total:
 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side/Back Panel(s) (label) for additional Precautionary Statements & First Aid.

Net Weight: 16 oz./ 1 lb.

Net Contents: [Contains 1 – 3 [lb.] (0.45-1.5 kg) [1-3 Bottles] [Bags]]

EPA Reg. No. 28293-322 EPA Est. No 67572-GA-1_A, 67572-GA-2_B,

69703-GA-1_C, 69703-GA-2_D

Subscript used is first letter of run code on

container.

IMPORTANT: Read the entire Directions for Use, Precautions and Disclaimer of Warranties before using this product.

ACCEPTED

06/17/2020

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 28293-322

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: May be harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

| FIRST AID | | | | |
|--|--|--|--|--|
| If on skin or | Take off contaminated clothing. | | | |
| 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. | | | | |

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains. drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are foraging the treatment area.

[{Optional customer-specific hotline information:}

If you have a medical emergency, need consultation on diagnosis, therapy and analysis please call 1-(800) 420-9347. If you have questions relating to product use or application, please call 1-(866) 945-5033. If you have a product spill or transportation emergency call 1-(800) 424-9300.

For Consumer Refund: [Company name], PO Box 95437, Palatine, IL 60095-0437.]

DIRECTIONS FOR USE

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

This product is a ready-to-use insecticide dust which exhibits effective knockdown and long-lasting control against the pests listed when according to label directions. It can be used for long-lasting pest control in and around homes and their immediate surroundings. Permitted areas of use include: [Animal Quarters], [Apartments], [Around Perimeter of Home], [Flowers], [Fruits (not in CA)], [Household Greenhouses], [Houses], [Lawns], [Mobile Homes], [Ornamentals], [Recreational Vehicles], [Vegetables], and [Vegetable Gardens].

This product is intended for applications from this shaker can where insects are found.

USE RESTRICTIONS

- Do not apply this product in a way that will contact any person or pet, either directly or through drift.
 Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until dust has settled.
- Not for use on plants grown for sale or commercial use, research, or commercial seed production.
- Do not apply to pets or pet bedding/quarters.
- In the home, all the food processing surfaces and utensils must be covered during treatment or thoroughly washed before use. Exposed food must remain covered or be removed.
- Application is prohibited directly into sewers, 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 water the treated area to the point of run-off. Do not make applications during rain.
- Do not apply into closed air handling systems, voids or ducts including Heating, Ventilation, Air Conditioning (HVAC) appliances and systems that circulate, filter, or condition air that is directed into rooms that are, or may be, occupied.

FOR OUTDOOOR USE

All outdoor applications must be limited to spot or crack and crevice treatments only, except for the following permitted uses:

- 1) Treatment to soil or vegetation around structures
- 2) Applications to lawns, turf, and other vegetation
- 3) Applications to building foundation, up to a maximum height of 3 feet.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, and structural surfaces (such as windows, doors and eaves) are limited to spot and crack-and-crevice applications only. 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 habitats can occur. Do not allow the product to enter any drain during or after application.

INDOOR USE

In living areas, make applications in such a manner as to avoid deposits on exposed surfaces or introducing the material into the air. To avoid staining, do not use on carpets, upholstery and other fabrics. Do not apply as a broadcast application indoors.

To apply insecticide directly into cracks and crevices, use a bulbous duster or other suitable equipment. Apply lightly and uniformly to infested area. Pay particular attention to cracks and crevices; service ducts, false floors and ceilings; wall voids; around electrical and telephone fittings and equipment; around water and sewer pipes; under and behind cabinets, refrigerators and sinks; around windows and door frames; along baseboards; in attics and crawl spaces. Apply 2-3 grams of product per square yard (0.5 lbs per 1000 ft2).

Ants, Boxelder Bugs, Cockroaches, Crickets, Fleas, Firebrats and Silverfish: Apply product thoroughly to all areas where these pests crawl and hide, especially in those areas described above. For Ants, apply to ant trails, around doors and windows and other places where ants enter premises.

Termites*, Carpenter Ants and Carpenter Bees: Apply to voids or channels in damaged wooden members of a structure; to cracks, spaces or bearing joints between wooden members of a structure; or between such members and the foundation; and in locations vulnerable to termite attack. Drilling may be necessary prior to applying dust in these locations, but is must be recognized that such drilling and treating of timber in a particular location may not result in complete coverage of infested and vulnerable voids or galleries. This dust can be applied in attics and crawl spaces to prevent entry of drywood and formosan termites at a rate of 0.5 lb. per 1000 square feet of floor area. In these treatments, all vents and blowers should be closed. Inspect at 6 months and one year to ensure that colony has been killed.

*Do not use this product as the sole source of control for active, structural infestations by subterranean termites; the purpose of this application is to kill workers or winged reproductive forms of termites which are present at the time of treatment. It is not intended to provide structural pest control. It is not a substitute for mechanical alteration, soil and foundation treatment, but merely a supplement. For active, structural infestations by subterranean termites, this product can only be used to supplement a federally registered conventional product that is registered as a sole source for termite control. This product will not eliminate termite infestations or provide protection against future infestations. For active termite infestations get a professional inspection.

Wall Void Treatments: To control Carpenter Ants in wall voids for up to one year [12 months], apply dust into wall voids through existing openings or by drilling a small hole. Insert end of puffer tip into opening and squeeze container. [Insert tip of hand-duster into opening and squeeze.] Apply approximately 0.2 grams (0.07 lbs. of dust per I00 sq. ft. of wall void [see markings on side of container]. Reseal hole after treatment. Nests in wall voids can be located by listening for insect activity against the wall.

Centipedes, Ground Beetles, Millipedes, Scorpions, Spiders, and Sowbugs: Apply dust along and behind baseboards, to window and door frames, corners, pipes, storage locations, attics, crawl spaces, and other areas where these pests may enter or crawl.

Wasps and Carpenter Bees: It is generally advisable to treat wasp and carpenter bee nests in the evening when insects are less active and have returned to the nest. Wear protective clothing if deemed necessary to avoid stings. Using hand or power duster [Actisol or similar equipment] or other suitable means, with extension tubes if necessary, thoroughly dust nest, entrance and surrounding areas where insect alight. Nests in wall voids can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in and reseal. For Ground Wasps, dust entrance and surrounding areas. For best results check nests carefully one or two days after treatment to ensure complete kill, then remove and destroy nest to prevent emergence of newly-hatched insects. Do not use this product to treat overhead nests.

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 the clothes. DO NOT apply this product directly to clothing.

Carpet Beetles (Black, Furniture, Common and Varied): Dust where these insects are found, for example: on and under edges of floor covering, around baseboards, under rugs and furniture, and in closets.

Bedbugs: Apply dust thoroughly to all areas where these pests are typically found including:, coils of springs, cracks and hollow posts of bedsteads, upholstery of chairs and sofas, picture frame moldings and all cracks and

crevices in the room should be treated. Allow powder to remain in contact with surface for 4-6 hours. Thoroughly vacuum treated areas, dispose of vacuum bag and place clean linens on bed.

DO NOT use this product on mattresses, pillows, bed linens, or clothes. Remove all clothes and other articles from dressers or clothes closets before applications. Not recommended for use as sole protection against bedbugs. If evidence of bedbugs is found *in/on* mattresses, use products approved for this use.

Stored Product [Pantry] Pests: To aid in the control of the exposed stages of: Cadelles, Cheese Mites, Cigarette Beetles, Confused Flour Beetles, Dark Meal Worms, Drugstore Beetles, Grain Mites, Granary Weevils, Lesser Grain Borers, Merchant Grain Beetles, Red Flour Beetles, Rice Weevils, Rusty Grain Beetles, Saw-Toothed Grain Beetles, Spider Beetles, Tobacco Moths, and Yellow Meal Worms.

In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Clean up waste materials, dust, dirt and other debris. Thoroughly treat floors, walls and other surfaces in storage and handling areas. Apply dust in cracks and crevices, behind and under cupboards, and other difficult to reach areas where insects may hide. DO NOT apply directly on food, utensils or on areas where food is stored.

OUTDOOR USE

Ornamental Plant Pests: For the control of: Alfalfa Weevil, Aphids, Agrave Billbug, Banded-wing Thrips, Bean Weevil, Beet Armyworms, Billbug, Black Oak Acorn Weevil, Blister Beetles, Boll Weevil, Boxelder Bugs, Certain Leafminers (Boxwood, Holly, Oak, Spruce Needle), Elm Leaf Beetle, Flea Beetles, Grape Leafhopper, Japanese Beetle, Lace Bug, Leaf-footed Bug, Leafhoppers, Leafrollers, Lesser Cloverleaf Weevil, Orange Tortrix, Periodical Cicada, Pine Weevil, Plant Bugs, Rose Chafer, Rose Midges, Rose Slugs, Rose Weevil, Scarlet-and-green Leafhoppers, Scarlet Plant Bug, Sharpshooters, Tent Caterpillars, Thrips, and Weevils.

Shrubs and Ornamentals: Apply when insects or their damage first appear and repeat at weekly intervals for as long as insects continue to appear. Apply 8 ounces per 1,000 square feet; or thoroughly apply to place a thin layer of dust on both upper and lower sides of leaves, stems, and flowers.

Roses, Petunias, Chrysanthemums, Geraniums, Carnations and Other Related Flowers: To control many leaf and flower chewing insects, apply as soon as the insect appears and repeat at 7-day intervals for as long as insects continue to appear. Apply a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

Perimeter Treatment: Use this product as a residual treatment for control of Almond Millipede, Ants, Carpenter Bees, Centipedes, Cockroaches, Crickets, Field Cricket, Firebrats, Flat Millipede, Fleas, Florida Millipede, Ground Beetles, House Cricket, Millipedes, Mormon Cricket, North American Millipede, Oak Timberworm Beetle, Scorpions, Silverfish, Slugs, Soft Millipede, Sowbugs, Spiders, Ticks and Wasps. Make a residual treatment to cracks and crevices around porches, eaves, patios, garages, under outdoor stairways, in crawl spaces and other areas where pests hide. To help prevent the invasion of buildings and structures by these pests, apply to cracks and crevices in the foundation and crawl spaces where pests are active and may find entrance.

Imported Fire Ant Mound Treatment: Apply product with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge of the mound). A second treatment may be necessary if complete control is not obtained. DO NOT DISTURB THE MOUND PRIOR TO APPLICATION. If possible, treat all colonies in the vicinity. Also, treat colonies which have not yet constructed a mound.

[Alternate directions - Evenly sprinkle one tablespoon (approximately ½ oz.) of this product over the top of each mound. Do not water in or disturb the mound. Apply when temperatures are between 65 and 80°F. Allow 3 to 4 days for maximum control. Food utensils such as a teaspoon or measuring cup should not be used for food after use with pesticides.]

Home Vegetable Gardens: Use this shaker can to dust lightly to cover both upper and lower leaf surfaces with a thin, even film of dust. Apply when air is calm to avoid drift and contact with eyes and skin. Start applying at the farthest corner of the treatment area and work backward to avoid contact with dusted surfaces. Allow dust to settle in treated areas before reentering. Observe the following crop-specific use directions, including the preharvest interval (PHI) which is the number of days between last application and harvest.

| Vegetables | Target Pests | Remarks | PHI | [Application Rate: Ounces of Dust per 100 ft ²] | Max. Applications per Growing Season | [Active Ingredient/ Acre] (This column is alternate text) | [Packages/100 ft²] (This column is alternate text) |
|--|---|---|-----|---|---|---|--|
| Artichoke, Globe | Aphids, Armyworm, Cabbage Looper, Cribrate Weevil, Leafminers, Lygus bug (Plant Bug), Pale Striped Flea Beetles, Plume Moth, Probas Bug | Do not apply more than recommended amount 0.14 lb ai/A (active ingredient/acre) in one growing season. Allow 3 days between applications. | 3 | 2.13 | 5 | 0.028 lb | 0.13 packages/ 100 ft ² |
| Bulb Vegetables: Garlic, Leeks, Onions, Shallots | Cutworms, Stink Bugs, Thrips, Squash Bugs | Do not apply more than recommended amount 0.112 lb ai/A in one growing season. Allow 5 days between applications. | 1 | 2.13 | 4 | 0.028 lb | 0.13 packages/ 100 ft ² |
| Corn, Sweet | Aphids, Armyworms, Chinch Bugs, Click Beetle, Corn Earworm, Corn Rootworm (Adult), Cutworms, European Corn Borer, Flea Beetles, Grasshoppers, Japanese Beetle (Adult), June Beetle (Adult), Masked Chafer (Adult), Southern Corn Borer, Southwestern Corn Borer, Stalk Borer, Stink Bugs, Squash Bugs, Two- Striped Grasshopper, Webworms | Do not apply more than recommended amount 0.45 lb ai/A in one growing season. | 1 | 2.13 | 16 | 0.028 lb | 0.13 packages/ 100 ft ² |

| Corn, Pop | Aphids, Armyworms, Chinch Bugs, Click Beetle, Corn Earworm, Corn Rootworm (Adult), Cutworms, European Corn Borer, Flea Beetles, Grasshoppers, Japanese Beetle (Adult), June Beetle (Adult), Masked Chafer (Adult), Southern Corn Borer, Southwestern Corn Borer, Stalk Borer, Stink Bugs, Squash Bugs, Two- Striped Grasshopper, Webworms | Do not apply more than recommended amount 0.095 lb ai/A] in one growing season. Allow 21 days between applications. | 1 | 1.68 | 4 | 0.022 lb | 0.1 packages/ 100 ft ² |
|--|---|---|---|------|---|----------|---------------------------------------|
| Cucurbit Vegetables: Cantaloupes, chayote, Chinese waxgourd, citron melon, cucumber, gherkin, gourds, Momordica species (balsom apple, bitter melon, Chinese cucumber), muskmelon, pumpkin, squash, watermelon | Armyworms, Cabbage Looper, Colorado Potato Beetle, Corn Earworm, Cucumber Beetle, Cutworms, Diamondback Moth (Larvae), Flea Beetles, Grasshoppers, Green Peach Aphid, Leafhoppers, Leafminers, Melonworm, Pickleworm, Stink Bugs, Squash Bugs, Tarnished Plant Bug, Tobacco Budworm, Tomato Pinworm, Two-Striped Grasshopper, Vegetable Weevil (Adult), Western Plant Bug, Whitefly (Adult) | Do not apply more than recommended amount 0.168 lb ai/A in one growing season. Allow 3 days between applications. | 3 | 2.13 | 6 | 0.028 lb | 0.13 packages/ 100 ft ² |
| Fruiting Vegetables: Eggplant, Ground Cherry, Pepinos, Peppers, Tomatillo, Tomato | Aphids, Armyworms, Cabbage Looper, Colorado Potato Beetle, Cucumber Beetle, Cutworms, Diamondback Moth, European Corn Borer, Flea Beetles, Imported Cabbageworm, Leafminers, Pepper Weevil, Stink Bugs, Squash Bugs, Tarnished Plant Bug, Thrips, Tomato Fruitworms (Corn Earworm), Tomato Pinworm, Variegated Cutworm, Whitefly | Do not apply more than recommended amount 0.168 lb ai/A in one growing season. Allow 5 days between applications | 1 | 2.13 | 6 | 0.028 lb | 0.13 packages/ 100 ft ² |

| Root | Armyworms, Cabbage | Do not apply more than | 3 | 2.13 | 5 | 0.028 lb | 0.13 packages/ |
|--|-----------------------------|----------------------------|---|------|---|----------|---------------------|
| Vegetables: | Looper, Colorado Potato | recommended amount | | | | | 100 ft ² |
| Carrot, | Beetle, Cutworms, | 0.14 lb ai/A in one | | | | | |
| Celeriac, | European Corn Borer, Flea | growing season. Allow 3 | | | | | |
| Chervil | Beetles, Green Peach | days between | | | | | |
| (Turnip | Aphid, Leafhoppers, Lygus | applications. Other than | | | | | |
| Rooted), | Bug (Plant Bug), Pea Aphid, | radishes, applications may | | | | | |
| Chicory, | Tarnished Plant Bug | not be made to root | | | | | |
| Edible | Turnished Flant Bug | vegetables whose tops or | | | | | |
| Burdock, | | leaves are to be harvested | | | | | |
| Garden Beet, | | for human consumption. | | | | | |
| Ginseng, | | To Traman consumption. | | | | | |
| Horseradish, | | | | | | | |
| Parsley | | | | | | | |
| (Turnip | | | | | | | |
| Rooted), | | | | | | | |
| • • • | | | | | | | |
| Parsnip, | | | | | | | |
| Radish, | | | | | | | |
| Oriental Radish, | | | | | | | |
| | | | | | | | |
| Rutabaga, | | | | | | | |
| Salsify, Black | | | | | | | |
| Salsify, | | | | | | | |
| Spanish | | | | | | | |
| Salsify, | | | | | | | |
| Skirret | | | | | | | |
| Turnip, Tuberous & | Armyworm, Cabbage | Do not apply more than | 3 | 2.13 | 5 | 0.028 lb | 0.13 packages/ |
| Corm | Looper, Colorado Potato | recommended amount | | 2.13 | | 0.02015 | 100 ft ² |
| Vegetables: | Beetle, Cutworms, | 0.14 lb ai/A in one | | | | | 200.0 |
| Potato, | European Corn Borer, Flea | growing season. Allow 3 | | | | | |
| Sweet | Beetle, Green Peach Aphid, | days between | | | | | |
| Potato, | Leafhoppers, Lygus Bug | applications. Applications | | | | | |
| Arracacha, | (Plant Bug), Pea Aphid, | may not be made to | | | | | |
| Arrowroot, | Tarnished Plant Bug | tuberous or corm | | | | | |
| Chinese | Turnished Flant Bug | vegetables whose tops or | | | | | |
| Artichoke, | | leaves are to be harvested | | | | | |
| Jerusalem | | | | | | | |
| | | | | | | | |
| | | for human consumption. | | | | | |
| Artichoke, | | | | | | | |
| Artichoke, Edible | | | | | | | |
| Artichoke, Edible Canna, Bitter | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), Chufa, | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), Chufa, Dasheen, | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), Chufa, Dasheen, Ginger, | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), Chufa, Dasheen, Ginger, Leren, | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), Chufa, Dasheen, Ginger, Leren, Tanier, | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), Chufa, Dasheen, Ginger, Leren, Tanier, Tumeric, | | | | | | | |
| Artichoke, Edible Canna, Bitter and Sweet Cassava, Chayote (Root), Chufa, Dasheen, Ginger, Leren, Tanier, | | | | | | | |

STORAGE AND DISPOSAL

Pesticide Storage: Store product in original container in a cool, dry, locked place out of the reach of children.

Container Disposal: Nonrefillable container. *If empty* – Do not reuse this container. Place in trash or offer for recycling if available. *If partly filled* – Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

PHAETON CORPORATION 1501 East Woodfield Drive 200W Schaumburg, IL 60173

[INSERT TRADEMARK STATEMENT(S) AS APPLICABLE]

GardenTech is a registered trademark of Gulfstream Home & Garden, Inc.

Sevin is a registered trademark of Tessenderlo Kerley, Inc.

Amdro Quick Kill, Central Garden & Pet, and Central Garden & Pet with design are trademarks of Central Garden & Pet Company.

Optional Marketing Statements

[Quick [Reference Table][Facts] {NOTE to Reviewer: Table below is optional}

| Product Facts | [Insert Claim(s) from List Below] | | | |
|---------------------|--|--|--|--|
| | [Read the label before applying!] | | | |
| | [This product is [ready] [to use] [and] [easy] to use] | | | |
| | [Simply shake to control listed insects] | | | |
| Where to Use | [Insert Claim(s) from List Below] | | | |
| | Fruit and Vegetable Gardens, Ornamental Plants and Shrubs, Flowers | | | |
| | and Ground Covers, Lawns, [Around Structures], [Home Perimeter] | | | |
| Fruits & Vegetables | [Insert Claim(s) from List Below] | | | |
| | [Insert fruits & vegetables from below table] | | | |
| Kills | [Insert Claim(s) from List Below] | | | |
| | [Insert listed pest from Pest List] | | | |
| | [And other listed [lawn & garden] [pests] [insects] [bugs]] | | | |

Product Facts:

Kills by contact
Long lasting residual action* *Up to 6 months
Keeps protecting for up to 6 months
Kills insects for up to 6 months
Provides a protective barrier to keep bugs away all season

Guaranteed to work* *or your money back
Controls many different insect pests
Ready-to-use
Home and garden insecticide
Protects listed edibles from damaging insects
Ready to use dust insect killer
Broad spectrum insect control
Starts killing immediately by contact

Where To Use:

For use on Home Garden Vegetables, Fruits, Ornamentals, edibles, flowers, around the home perimeter To Control Imported Fire Ants on Lawns and Other Residential Areas

Fruits and Vegetables:

Protects over 60 listed fruits and vegetables Ideal for outdoor container gardening

Kills:

Kill annoying insects and reclaim your lawn

Kills over 100 listed insects

Kills over 100 listed pests

Kills over 100 common household insects

Kills over 100 common household pests

Kills over 100 listed pests on Vegetables, Fruits, Ornamentals, & Lawns

Kills Numerous listed Pests on Lawns and Ornamentals

Ants, Aphids, Armyworms, Cutworms, Cabbage Looper, Japanese Beetles, Stink Bugs, Cucumber Beetles and other listed pests

Indoor: Ants, Bedbugs, Carpet Beetles, Cockroaches, Fleas, Scorpions, Termites*, Carpenter ants, Boxelder bugs, Spiders and Silverfish

Outdoor: Ants, Boxelder Bugs, Centipedes, Cockroaches, Fire Ants, Fleas, Grasshoppers, Ground Beetles, Leafhoppers, Crickets, Millipedes, Scorpions, Sowbugs and other listed insects

For Household Use Household Ornamental Garden Insect Control Controls Fire Ants, Fleas, Ticks, and More Kills Termites*

*The purpose of such applications of this product is to kill workers or winged forms which may be present in the treated channels at the time of treatment, only. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but merely a supplement. For active termite infestations get a professional inspection

Non-Staining and Odorless
Non-staining
Low odor formula
Long-Lasting Residual Action* *Up to 6 months
Long-Lasting* * Up to 6 months
Does Not Clump or Absorb Moisture

For Use on Ornamentals

Use on Roses, Flowers and Ornamentals

Controls Many Different Insect Pests

To Control Imported Fire Ants on Lawns and Other Residential Areas

8 oz. Treats 15 Fire Ant Mounds

12 oz treats up to 22 Mounds

[1 lb.] Treats 30 Fire Ant Mounds

[2 lbs.] Treats 60 Fire Ant Mounds

Guaranteed to Work [*] [*] Or Your Money Back

Guaranteed results[*] [*]or your money back

Easy to Use

Convenient

Kills Fire Ants on Contact

Ready-To-Use

No Need to Water!

Multi-Purpose

Indoor: Ants, Fleas, Termites*, {see footnote above} Carpenter ants, Boxelder bugs, Cockroaches and Silverfish

Outdoor: Crickets, Millipedes, Scorpions, Sowbugs and other listed insects

For use on Home Garden Vegetables, Fruits, Ornamentals [Listed edibles], [flowers], [around the home perimeter]

To control [kill] vegetable pests

Not harmful to grasses

Won't harm [your] lawn* [or garden] [plants] [shrubs] [vegetables] [fruits] [edibles] [flowers]

[ornamentals][blooms] *when used as directed

Tough on [insert listed insects], gentle on [your] lawn [or garden] [plants] [shrubs] [vegetables]

[fruits] [edibles] [flowers] [ornamentals][insert listed site]

Control (Kills) [lawn] (invading) damaging insects (pests) as listed

Kill [annoying] [damaging] [insects] [pests] and reclaim your [lawn][home] [today!]

Strong [insect][pest] protection for your [insert listed site]

Ideal for [outdoor] container gardening

Protects listed edibles from damaging insects

Protects over XXX listed fruits and vegetables

Protect your [roses][flowers][lawn][and][garden] from [damaging][harmful] pests.

Can be used up to 1 day before harvesting Tomatoes, Garden beet, Bushberries

Protect your [garden][insert labeled site][veggies][listed vegetable][listed fruit][listed edible] with [insert brand name]!

Growing [insert listed site]? Protect them [from] [insert listed pest] with [insert brand name]!

Grow your own [fruits] [and] [vegetables] – protect them with [insert brand name]!

Can be used on vegetables (vegetable gardens)

[Bug] [Insect] Killer

Hate The Bugs. Love The Garden. Get [insert brand name]!

Got [insert listed pest here]? Get [insert brand name]!

Ready-to-Use [insert brand name] Dust Insect Killer

Plant A Love for Gardening

Now larger size! [*compared to X [lb]/[oz] [bag][can])

Non-systemic

Home & Garden insecticide

Broad spectrum insect control

Protects against listed damaging insects

Starts killing immediately by contact

Reclaim your garden!

Won't harm [your] [plants,] [blooms,] [or] [lawn]* *When used as directed

Replace cap

Remove [liner][seal] before use

Cut here to open

Works two ways: (1) Kills (and) (2) Prevents

Easy To [Use] [Apply]

[This product is] Ready To Use

Visible results

No mixing or watering required

Just sprinkle to control [insert listed insect] [insects]

Kills [over 100] listed pests on Vegetables, Fruits, Ornamentals & Lawns

Kills over 100 listed [pests] [insects]

Kills over 100 common household [insects][pests][bugs]

Kills Numerous [Over 100] Listed Pests on Lawns and Ornamentals

Kills over 100 listed Insect Pests:

Kills [insert listed pest]

Kills Insects for Up to 6 Months

Kills by Contact

Keeps protecting up to 6 Months

Kills Insects Up to 6 Months

Provides a protective barrier to keep bugs away [all season]

Trusted Brand since [insert year]

Established brand since [insert year]

Est. [insert year]

Trusted brand for over XX years

Formulated and Packaged in the U.S.A.

Buy X Get X Free

Special Value! X% More (than X [lb]/[oz] [bag][can])

PEST LIST: {NOTE to Reviewer: This pest list is optional}

Indoor:

- 1. Ants
- 2. Bedbugs
- 3. Bees
- 4. Boxelder Bugs

- 5. Cadelles
- 6. Carpenter Ants
- 7. Carpenter Bees
- 8. Carpet Beetles (Black)
- 9. Carpet Beetles (Common)
- 10. Carpet Beetles (Furniture)
- 11. Carpet Beetles (Varied)
- 12. Centipedes
- 13. Cheese mites
- 14. Cigarette beetles
- 15. Cockroaches
- 16. Confused flour beetles
- 17. Corn borer
- 18. Crickets
- 19. Dark meal worms
- 20. Drugstore beetles
- 21. Firebrats
- 22. Fleas
- 23. Grain mites
- 24. Granary weevils
- 25. Ground Beetles
- 26. Lesser grain borers
- 27. Merchant grain beetles
- 28. Millipedes
- 29. Red four beetles
- 30. Rice weevils
- 31. Rusty grain beetles
- 32. Saw-toothed grain beetles
- 33. Scorpions
- 34. Silverfish
- 35. Sowbugs
- 36. Spider beetles
- 37. Spiders
- 38. Termites
- 39. Termites
- 40. Tobacco moths
- 41. Wasps
- 42. Webbing clothes moths
- 43. Yellow meal worms

Outdoor:

- 1. Ants
- 2. Agrave Billbug
- 3. Alfalfa Weevil
- 4. Almond millipede
- 5. Aphids
- 6. Armyworm
- 7. Banded-wing thrips

- 8. Bean Weevil
- 9. Bees
- 10. Beet armyworms
- 11. Billbug
- 12. Black Oak Acorn Weevil
- 13. Blister beetles
- 14. Boll Weevil
- 15. Boxelder bugs
- 16. Cabbage looper
- 17. Centipedes
- 18. Chinch bugs
- 19. Click beetle
- 20. Cockroaches
- 21. Colorado potato beetle
- 22. Corn earworm
- 23. Corn rootworm
- 24. Cribrate weevil
- 25. Crickets
- 26. Cucumber beetle
- 27. Cutworms
- 28. Diamondback moth
- 29. Diamondback moth (larvae)
- 30. Elm leaf beetle
- 31. European corn borer
- 32. Field Cricket
- 33. Fire ants
- 34. Firebrats
- 35. Flat millipede
- 36. Flea beetles
- 37. Fleas
- 38. Florida millipede
- 39. Grape Leafhopper
- 40. Grasshoppers
- 41. Green peach aphid
- 42. Ground beetles
- 43. Ground wasps
- 44. House Cricket
- 45. Imported cabbageworm
- 46. Japanese Beetles
- 47. June beetle (adult)
- 48. Leafhoppers
- 49. Leafminer (Boxwood)
- 50. Leafminer (Holly)
- 51. Leafminer (Oak)
- 52. Leafminer (Spruce Needle)
- 53. Leafrollers
- 54. Lesser Cloverleaf Weevil
- 55. Lygus bug (plant bug)

- 56. Masked chafer (adult)
- 57. Melonworm
- 58. Millipedes
- 59. Mormon Cricket
- 60. North American millipede
- 61. Oak Timberworm Beetle
- 62. Orange tortrix
- 63. Pale striped flea beetles
- 64. Pea aphid
- 65. Pepper weevil
- 66. Periodical Cicada
- 67. Pickleworm
- 68. Pine Weevil
- 69. Plant bugs
- 70. Plume moth
- 71. Probas bug
- 72. Rose chafer
- 73. Rose midges
- 74. Rose slugs
- 75. Rose Weevil
- 76. Scarlet-and-green Leafhopper
- 77. Scorpions
- 78. Sharpshooter
- 79. Silverfish
- 80. Slugs
- 81. Soft millipedes
- 82. Southern corn borer
- 83. Southwestern corn borer
- 84. Sowbugs
- 85. Spiders
- 86. Squash bugs
- 87. Stalk borer
- 88. Stink bugs
- 89. Tarnished plant bug
- 90. Tent caterpillars
- 91. Thrips
- 92. Ticks
- 93. Tobacco budworm
- 94. Tomato fruitworm (corn earworm)
- 95. Tomato pinworm
- 96. Two-Striped Grasshopper
- 97. Variegated Cutworm
- 98. Vegetable weevil (adult)
- 99. Wasps
- 100. Webworms
- 101. Weevils
- 102. Western plant bug
- 103. Whitefly (adult)