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DEC 11 1995

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5498152  $\frac{345}{11}$

Elizabeth L. Neslund  
Safer®, Inc.  
9959 Valley View Road  
Eden Prairie, MN 55344

Dear Ms. Neslund:

**Subject:** Safer Entire Insect Killer Concentrate  
EPA Registration No. 42697-34  
Label amendment dated June 8, 1995 and revised Confidential  
Statement of Formula dated October 20, 1995

The Confidential Statement of Formula (CSF), referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is not acceptable for the reason given below.

1. The certified limits for the active ingredient pyrethrins are incorrect. The limits should be  $\pm 10\%$  of the nominal concentration. Please refer to 40 CFR 158.175 for further information. If you wish to propose certified limits that differ from the standard calculation, you must submit an explanation of the basis of these proposed certified limits including how the certified limits were arrived at and its accuracy and precision. Please submit a revised CSF or an explanation of proposed limits as soon as possible.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

Robert A. Forrest  
Product Manager (14)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure

Bedwards A: 42697 | 34.4

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**RETAIL LABEL**

**FRONT LABEL**

**Safer® Brand Entire Insect Killer Concentrate**

**Optional marketing statements:**

- New from Safer® Brand •Pyrethrin and Insecticidal Soap
- Kills aphids, whiteflies, scales, (spider) (red) mites, mealybugs, thrips and other listed pests.
- For use on houseplants, flowers, herbs, ornamentals, fruits and vegetables grown in and around homes and home greenhouses and other interior plantings.
- For use on houseplants, flowers, herbs, shrubs, ornamentals, fruits and vegetables.
- For use in and around homes and home greenhouses and other interior plantings.
- WATER-BASED •Quick knock-down •Reliable •Kills (bugs) on contact.
- Unique, patented formula •Easy to use
- Kills Japanese Beetles on Contact •Fresh scent
- Use up to day of harvest •Gentle on plants •Dual killing action
- non-PBO\* formula. Does not contain PBO\*. (\*Piperonyl butoxide)
- Made with botanical pyrethrins from *Chrysanthemum* flowers.
- Broad-spectrum insect killer •Indoor and Outdoor
- Satisfaction Guaranteed. See back panel.
- Multi-purpose •Broad spectrum •Dual action
- Water Based Products since 1976

ACTIVE INGREDIENTS	BY WT.
Pyrethrins.....	0.20%
Potassium Salts of Fatty Acids.....	20.00%
INERT INGREDIENTS.....	<u>79.80%</u>
TOTAL.....	100.00%

Keep out of reach of Children

**CAUTION**

(See back panel for additional precautionary statements.)

Net contents: 16 fl. oz.

**ACCEPTED**

**DEC 11 1995**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, this pesticide  
registered under  
EPA Reg. No. 42697-34

BACK PANEL

Safer® Brand Entire Insect Killer Concentrate

KILLS:

BEETLES, CATERPILLARS, APHIDS, WHITEFLY, SAWFLIES, SCALES, (SPIDER) (RED) MITES, MEALYBUGS, THIRPS, WASPS, HORNETS, ANTS, SOWBUGS, EARWIGS, AND OTHER LISTED PESTS

ON HOUSEPLANTS, FLOWERS, HERBS, BERRIES, FRUITS AND VEGETABLES, SHADE TREES, EVERGREENS, ORNAMENTALS, CACTI AND SUCCULENTS GROWN IN AND AROUND HOMES AND HOME GREENHOUSES AND OTHER INTERIOR PLANTINGS

DIRECTIONS FOR USE:

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

SHAKE WELL BEFORE USING. Always use freshly mixed solution. Use soft water whenever possible. Use with caution on new tender foliage, and avoid spraying plants in full sun. For plant use mix one part concentrate to twenty parts water or 5 fl. oz. (10 TBS) per gallon of water.

VEGETABLES: Use as directed above on asparagus, beans, broccoli, brussels sprouts, cabbage, kale and oriental vegetables, herbs, lettuce, eggplant, peppers, tomatoes, potatoes, cucumbers, melons and squash to control (kill) ASPARAGUS BEETLES, BEAN BEETLES, COLORADO POTATO BEETLES, CUCUMBER BEETLES, FLEA BEETLES, CATERPILLARS (including CABBAGE LOOPERS, IMPORTED CABBAGEWORM, ARMYWORMS, HORNWORMS, DIAMOND BACK MOTH LARVAE), LEAF HOPPERS, PLANT BUGS, PSYLLIDS, APHIDS (SPIDER) (RED) MITES, MEALYBUGS AND WHITEFLY.

FRUIT AND NUTS: Use as directed above on apples, avocados, citrus (grapefruit, lemons, oranges, tangerines), peaches, nectarines, apricots, pears, almonds, pecans, walnuts, kiwi fruit, blackberries, logan berries, raspberries, strawberries and grapes to control (kill) JAPANESE BEETLES, FLEA BEETLES, WEEVIL ADULTS, CATERPILLARS (including NAVAL ORANGE WORM, BAGWORMS, LEAFTIERS, CODLING MOTH and TENT CATERPILLARS), APHIDS, LEAFHOPPERS, PSYLLIDS, SCALE CRAWLERS, and SAWFLY LARVAE.

LAWNS: Use as directed above on lawns and turf grass to control (kill) CHINCH BUGS, LAWN MOTH, SOD WEBWORM, ARMY WORMS, and other miscellaneous pests.

ORNAMENTAL TREES AND SHRUBS: Use as directed above on ornamentals including azaleas, camellias, cacti dogwood, rhododendrons, evergreens and broad-leaved shade trees to control (kill) APHIDS, BEETLES, CATERPILLARS (including GYPSY MOTH LARVAE, TENT CATERPILLARS, WEBWORMS, BAGWORMS AND LEAFTIERS), LACE BUGS, BOX ELDER BUG, LEAFHOPPERS, PSYLLIDS, SAWFLIES, SCALES (SPIDER) (RED) MITES, MEALYBUGS, THIRPS AND WOOLLY APHIDS.

CAUTION: Do not use on horse chestnut, Japanese maple or mountain ash.

**FLOWERS:** Use as directed above on asters, carnations, chrysanthemums, geraniums, marigolds, petunias and roses to control (kill) APHIDS, BEETLES (including FLEA BEETLES AND JAPANESE BEETLES), CATERPILLARS, PLANT BUGS and WHITEFLY.

CAUTION: Do not spray blooms or partially open flower buds. Do not use on bleeding heart or gardenias. Test on fuchsias and impatiens for varietal sensitivity.

**HOUSEPLANTS:** Use as directed above on houseplants to control (kill) APHIDS, CATERPILLARS, (SPIDER) (RED) MITES, MEALYBUGS, THRIPS, SCALES and WHITEFLY. Apply when insects or signs of damage are first sighted to thoroughly moisten all infested plant surfaces. Repeat treatment at 7 to 10 day intervals or as needed.

CAUTION: Do not use on Crown of Thorns, jade plant or delicate ferns. Test on begonia, fuschias and impatiens for varietal sensitivity.

To control (kill) WASPS, HORNETS, ANTS, EARWIGS, TICKS, FLEAS and SOWBUGS apply spray directly to the insects, their nests or their hiding places. DO NOT USE DIRECTLY ON DOMESTIC ANIMALS OR PETS.

#### TO CONTROL (KILL) ADULT MOSQUITOES

Mix one part concentrate to forty parts water or 2.5 FL. OZ. (5 TBS) PER GALLON OF WATER. Apply dilute spray in early morning to foliage where mosquitoes are resting or as a fine aerial application to evening flying adults.

#### PRECAUTIONARY STATEMENTS:

##### Hazards to Humans and Domestic Animals.

**CAUTION:** Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**First Aid:** If swallowed: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink a large quantity of water. Do not administer liquids to an unconscious person. If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists. If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

**In Case of Emergency, call 1-800-228-5635, ext. 170.**

**Environmental Hazards:** This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover fish aquaria before spraying adjacent area.

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**STORAGE AND DISPOSAL**

**Storage:** Store at room temperature or colder, in original container only, out of reach of children and animals. Do not store full or partial container in direct sunlight. Keep container tightly sealed. (Protect from freezing. If frozen, thaw and shake well.)

**Disposal:** Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash.

Ringer Corporation and Safer®, Inc. will not accept liability for damage or injury resulting from misuse.

Made in U.S.A.

If you are not completely satisfied with this product, or for consumer information, call 1-800-654-1047 weekdays 9-5 Central time to arrange for a refund of the purchase price or replacement of the product. Proof of purchase is required.

Distributed by: Safer®, Inc., a wholly owned subsidiary of Ringer Corporation  
9959 Valley View Road  
Eden Prairie, MN 55344

EPA Reg. No. 42697-34

EPA Est. No.                   K                   M  
11600-MN-001   44616-MO-001  
Superscript or circled number corresponds to the first letter of the lot number on the bottom or back of the container.

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Faint, illegible text or markings in the bottom right corner of the page.

COMMERCIAL LABEL

FRONT LABEL

Optional marketing statements:

- New from Safer® Brand
- Kills aphids, whiteflies, scales, (spider) (red) mites, mealybugs, thrips and other listed pests.
- For use on houseplants, flowers, herbs, shrubs, ornamental, fruits and vegetables
- For use in and around greenhouses and other commercial interior plantings
- Water-Based •Quick knock-down •Kills (bugs) on contact
- Unique, patented formula •Kills Japanese Beetles on Contact
- Use up to day of harvest •Dual killing action
- Made with botanical pyrethrins from Chrysanthemum flowers
- Broad-spectrum insect killer •Indoor and Outdoor
- Multi-purpose •Dual action

ACTIVE INGREDIENTS	BY WT.
Pyrethrins.....	0.20%
Potassium Salts of Fatty Acids.....	20.00%
INERT INGREDIENTS.....	79.80%
TOTAL.....	100.00%

Keep out of reach of Children

CAUTION

(See back panel for additional precautionary statements.)

Net contents: 2.5 gal., 30 gal.

Statement of Practical Treatment (First Aid): If swallowed: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink a large quantity of water. Do not administer liquids to an unconscious person. If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists. If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

Exclusionary statement for commercial size products being used by golf courses, and not commercially: (Required WPS statements would come off and Statement of Practical Treatment would move under Precautionary Statements)

NOT FOR USE ON PLANTS BEING GROWN FOR SALE OR OTHER COMMERCIAL USE, OR FOR COMMERCIAL SEED PRODUCTION, OR FOR RESEARCH PURPOSES. FOR USE ON PLANTS INTENDED FOR AESTHETIC PURPOSES OR CLIMATIC MODIFICATION AND BEING GROWN IN ORNAMENTAL GARDENS OR PARKS, OR ON GOLF COURSES OR LAWNS AND GROUNDS.

7810

BACK LABEL

KILLS:

BEETLES, CATERPILLARS, APHIDS, WHITEFLY, SAWFLIES, SCALES, (SPIDER) (RED) MITES, MEALYBUGS, THRIPS, WASPS, HORNETS, ANTS, SOWBUGS, EARWIGS, AND OTHER LISTED PESTS

ON COMMERCIAL INTERIOR PLANTINGS, FLOWERS, HERBS, BERRIES, FRUITS AND VEGETABLES, SHADE TREES, EVERGREENS, ORNAMENTALS, GROWN IN AND AROUND GREENHOUSES

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours.

PPE required for early entry to treated area that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: Coveralls, chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton, shoes plus socks, and protective eyewear.

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**In Case of Emergency, call 1-800-228-5635, ext. 170.**

**Personal Protective Equipment:** Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear: Long-sleeved shirt and long pants, chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton, shoes plus socks, and protective eyewear.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**Environmental Hazards:** This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover fish aquaria before spraying adjacent area.

**STORAGE AND DISPOSAL**

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