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10-28-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OCT 28 2010

Quest Chemical Corporation  
c/o Mitch Whitney  
12255 FM 529  
Houston, TX 77041

Subject: [Amendment] Notification of Minor Label Change, Adding Optional Marketing Language  
Revenge Insect Killer, Alternate Brand: Stormtrooper Insect Killer  
EPA Reg. No. 44446-64  
Your Submission Dated June 8, 2010  
Decision No: 438194

Dear Mr. Whitney:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, subject to the comments below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Per the Label Review Manual (Chapter 15), because the zip code listed is not a unique zip code to the company, you must add either the street address or P.O. Box so that the full company address is listed on the product label.
2. In the footnotes directly under the Ingredients Statement, correct the cis/trans ratio for permethrin to read a minimum of 45% (+/-) cis and maximum of 55% (+/-) trans to match the cited product.
3. Per the Agency's letter to registrants of pyrethroid-containing products, dated June 4, 2009, replace the existing statement (below) and update the Environmental Hazards statement to read as follows:

Old: "Do not contaminate water by disposal of wastes."

New: "This product is extremely toxic to fish and other aquatic organisms. 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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems."

4. Per the Agency's letter to registrants of pyrethroid-containing products, dated June 4,

2009, add the following statements under the Restrictions in the Directions for Use section to read as follows:

“Do not water the treated area to the point of run off.

Do not make applications during rain.

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 building foundations, 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 habitat can occur. Do not allow to product to enter any drain during or after application.”

- 5. In the Directions for Use section, remove “should” to make the following statements mandatory for the user:

“In the home, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food.”

- 6. In the list of use sites listed after General Information in the Directions for Use section, delete “but are not limited to” from the statement.

- 7. In the Directions for Use for Brown Dog Ticks and Fleas, remove “should” from the second to last sentence:

“Remove old bedding of pets and replace with clean fresh bedding after treatment of pet areas.”

- 8. In the Directions for Use for Pantry Pests, remove “should” from the last sentence to make the following statement mandatory for the user:

“Dispose of infested stored food products in the home.”

- 9. The footnote for termites should remain on the panel side as for the termite footnote under the brand name on the front panel.

10. Consider changing the symbol used for the termite footnote, because the use of the single asterisk for multiple places (i.e., “\*Termite” in the list of pests under the brand name and “\*Tetramethrin” in the Ingredients box) is not clear.

If you have any questions regarding this action, please contact Rosanna Louie at (703) 308-0037.

Sincerely,



Richard Gebken  
Product Manager 10, Insecticide Branch  
Registration Division (7504P)

Enclosure:

- Stormtrooper Insect Killer Label, Stamped *Accepted with Comments*

# STORMTROOPER

## Insect Killer

Recommended for Household and Commercial/Industrial Use in Non-Food/Feed Areas

- Contains Synergized Permethrin and Tetramethrin
- Provides Quick Killing Action and Residual Control
  - Economical Do-It-Yourself Pest Control
- Use Indoors and Outdoors • Kills Fire Ants - Fleas - Roaches - Ants
  - Kills on Contact - Kills Fast - Kills Hidden Bugs
  - Kills Bugs You See and Even the Ones You Don't
- A broad spectrum insecticide highly effective against Ants, Carpenter 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. \*Termites, Ticks and many other similar crawling insects
  - Water-Based Formula, Non-Staining
- No Oily Residues; No Unpleasant Odor • Protects for up to 4 weeks
  - [• Kills Fire Ants in Their Mounds]
  - [Denotes Alternate Text]

### ACTIVE INGREDIENTS:

*Tetramethrin .....	0.150%
**Permethrin .....	0.375%
***Piperonyl Butoxide Technical .....	0.750%

### INERT INGREDIENTS:

TOTAL .....	98.725%
TOTAL .....	100.000%

- \* 1-cyclohexene-1,2-dicarboximidomethyl 2,2-dimethyl-3-(2-methylpropenyl) cyclopropane-carboxylate.
- \*\* (3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropane-carboxylate. Cis/trans ratio: min. 35% (+/-) cis and max. 65% (+/-) trans.
- \*\*\* Equivalent to min. 0.60% (butylcarbitol)(6-propylpiperonyl) ether and 0.15% related compounds.

EPA Reg. No. 44446-64

EPA Est. No. 44446-TX-1

KEEP OUT OF REACH OF CHILDREN

**CAUTION**

See Side Panel For Additional Precautions

NET WT. 18 OZ. (510 g)

Manufactured By

**QUEST**  
CHEMICAL CORPORATION

Houston, Texas 77041

For the Federal Insecticide, Fungicide, and Rodenticide Act, registered, for the pesticide label under EPA Reg. No. 44446-TX-1

OCT 28 2010

ACCEPTED  
With COMMENTS  
In EPA Letter Dated:

### PRECAUTIONARY STATEMENTS

#### Hazards To Humans & Domestic Animals

**CAUTION:** Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

#### Environmental Hazards

This product is toxic to fish. Do not apply directly to water. Do not contaminate water by disposal of wastes.

#### FIRST AID

<p><b>If Inhaled:</b></p> <ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<p><b>If on skin or clothing:</b></p> <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>
<p><b>If in eyes:</b></p> <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p><b>If swallowed:</b></p> <ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>

#### 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.

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. 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.

This product may be used as a crack and crevice treatment or as a spot application in non-food/feed areas. All areas where insects hide or through which insects may enter should be treated.

For use in non-food/non-feed areas such as garbage rooms, lavatories, floor drains (to sewers), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

Not for use in Federally Inspected Meat and Poultry Plants.

Do not apply this product in occupied patient rooms or in any rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use.

**General Information:** This product provides effective control of pests in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include, but are not limited to: apartment buildings, homes, hotels, hospitals, nursing homes, schools, industrial buildings, laboratories, mausoleums, private residences, utilities and the non-food/feed areas of food/feed handling establishments, and on: vessels, railcars, aircraft (cargo areas only), buses, trucks and trailers.

**Surface Spray Application:** Remove protective cap. Hold container upright with nozzle away from you. 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 & 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 1/2 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 nonresistant and organophosphate and carbamate resistant strains), Ants, Booklice, Boxelder Bugs, Centipedes, Dermestids, Firebrats, Fleas, Palmetto Bugs, Silverfish, Sowbugs, Ticks and Waterbugs: Spray into hiding places such as cracks and crevices, behind sinks,

cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible. Repeat every 4 weeks.

**Ants:** Spray freely around ant trails, doors and windows and other places where ants enter premises around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray freely on and around debris. Repeat every 4 weeks.

**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. Inject into wall voids and infested wood through existing openings or newly drilled small holes.

**Brown Dog Ticks and Fleas in Buildings:** Apply to 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. Old bedding of pets should be removed and replaced 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 Sawtoothed), Flour Beetles (Red and Confused), Rice Weevils, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Choccawalis, 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, around processing and handling equipment, around cartons or containers or other areas where these insects tend to congregate. Allow spray to dry prior to replacement of food and utensils. Infested stored food products in the home should be disposed of.

**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. Repeat every 4 weeks.

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

**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 5-6 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 from 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.

**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 to 3 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, garage and refuse dumps. Repeat every 4 weeks.

**Localized Treatment of Wood-Infesting Insects:** Beetles and Borers (such as the following families: Anobiidae, Bostrichidae, Buprestidae, Cerambycidae, Lyctidae, Oedemeridae, Sesiidae), Carpenter Bees, Termites and Wood Wasps: Locate area of infestation and/or insect tunnels and cavities. Using a crack & crevice tip, spray into tunnels, galleries and inaccessible closed voids. In infested areas, small holes should be drilled eight to ten inches apart to insure thorough insecticide gallery treatment. Be sure not to contact electrical wiring or plumbing when treating. For Carpenter Bees, seal the entrance holes with small pieces of stainless steel wool after application.

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

**NOTICE:** Buyer assumes all responsibility for safety and use not in accordance with directions.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.  
**STORAGE:** Do not store near heat or open flame. Store in cool dry area away from children.  
**DISPOSAL:** 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 1-800-CLEANUP for disposal instructions.  
**INGREDIENTS (CAS#):** Water (7732-18-5), Propane-isobutane (68476-85-7), Permethrin (52645-53-1), Isoparaffinic Solvent (64742-47-8).

**HMS RATINGS:** HEALTH-2, FLAMMABILITY-1, REACTIVITY-1, PERSONAL-A.

Made in USA

ITEM 426

FLC