



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 3, 2007

Mr. Steven E. Rogosheske,
Agent for Chem-Tech, Ltd.
1479 West Pond Road
Eagan, MN 55122-2881

**Subject: Amended Labeling to Add Control of Bedbugs
CT-511 Aerosol Insecticide, EPA Reg. No. 47000-73
Your Submission Dated October 30, 2006**

Dear Mr. Rogosheske:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provisions:

First Aid section comment(s), page 1 of 3:

1. Replace the last statement of this section that starts with "For emergency information contact..." with the following:

"Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx or the National Pesticide Information Center at 1-800-858-7378. ¹

Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia."

Directions for Use section, Home and Food Processing Area Use subsection comment(s), page 2 of 3:

2. Replace this subsection with the following new subsections:

"FOOD PROCESSING AREA USE: For flies, mosquitoes, small flying moths (millers) and gnats: Close all doors and windows. Point nozzle upward and direct the spray mist to all parts of the room, especially windows and other light sources which attract these insects. Fill the room with mist, and then leave the treated areas. Keep the room closed for at least 15 minutes. Thoroughly ventilate the room when treatment is completed. **Roaches, Waterbugs, Sowbugs, spider and centipedes:** Spray thoroughly into the following hiding places: cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas. Spray directly on insects where possible. Repeat as necessary. **Ants:** Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary."

¹ Please note that the "1-800-xxx-xxxx" must be substituted with a valid phone number that is available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

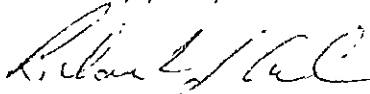
"HOME USE: For **flies, mosquitoes, small flying moths (millers) and gnats:** Close all doors and windows. Point nozzle upward and direct the spray mist to all parts of the room, especially windows and other light sources which attract these insects. Fill the room with mist, and then leave the treated areas. Keep the room closed for at least 15 minutes. Thoroughly ventilate the room when treatment is completed. **Roaches, Waterbugs, Sowbugs, spider and centipedes:** Spray thoroughly into the following hiding places: cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas. Spray directly on insects where possible. Repeat as necessary. **Ants:** Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary. To kill **bedbugs:** Apply as a spot treatment to cracks and crevices, around baseboards, floorboards, headboards and floors around sleeping area. Spray mattresses and box springs until slightly damp, around tufts, folds and seams. Allow treated surfaces to thoroughly dry before use. Repeat as necessary, but no more than once per day."²

Chem-Tech, Ltd. should note that a notice of availability of EPA's reregistration eligibility decision (RED) document for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). Further, EPA's RED for products containing MGK-264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide and MGK-264.

Within forty-five (45) days from the date of this letter, you should submit a label amendment revising the "Warranty & Disclaimer" section in accordance with the guidance document entitled, "Guidance on Warranty Statements" and dated October 17, 2006. This update can be found at the following hyperlink: <http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>.

A stamped copy of the referenced label is attached for your records. Please submit two (2) copies of the final printed labeling before releasing the product for shipment. If you have any questions regarding the label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Attachment

047000-00073 D-377215

² For more detailed information, please refer to page 2 of 2 from the enclosed copy of the efficacy review for this product.

ACCEPTED
with COMMENTS
In EPA Letter Dated
April 3, 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No
47000-13



CT-511
Aerosol Insecticide

PRESSURIZED

DUAL SYNERGISTS – KILLS & REPELS

House Flies, Horn Flies, Stable Flies, Horse Flies, Face Flies, Deer Flies, Gnats Mosquitoes, Small Flying Moths (millers),
Roaches, Waterbugs, Sowbugs, Spiders, Centipedes, Ants, Crickets, Wasps, and Hornets.

For Use In Bottling, Breweries, Homes, Bakeries, Food Plants, Stores, Restaurants, Schools, Hotels, Motels, Office Buildings,
Hospitals, Warehouses, Food Handling Plants, Dairies, Milk Houses, Cattle, Horse, Poultry, and Swine Quarters.
For use on cattle, horses, and swine.

ACTIVE INGREDIENTS:

Pyrethrins.....	0.5%
*Piperonyl Butoxide, Technical.....	1.0%
N-Octyl Bicyclpheptene Dicarboximide	1.0%
**INERT INGREDIENTS	<u>97.5%</u>
TOTAL	100.0%

*Equivalent to 0.8% (Butyricarbityl) (6-Propyipiperonyl) ether and 0.2% related compounds.

**Contains Petroleum Distillates

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

If Inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration,
preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

If Swallowed: Call a poison control center or doctor immediately for treatment advice. 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 in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first
5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

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.

For emergency information contact: National Pesticide Information Center at 1-800-858-7378 between 6:30 am and 4:30 Pacific
Time. After 4:30 call your poison control center

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Avoid contact with skin and eyes. Avoid inhalation of spray mist. Avoid contamination of feed and foodstuff.

When using this product as a space spray in food processing plants, foods must be removed or covered during treatment. Apply only when the facility is not in operation. At home and in food processing establishments, cover or remove food prior to treatment. Cover food contact surfaces, benches, utensils, equipment, etc., during treatment or thoroughly clean prior to use with an effective cleaning compound followed by a potable water rinse.

In hospitals or other medical facilities, remove patients prior to treatment. Ventilate treated area for two hours prior to returning patients.

Do not remain in treated areas and ventilate the area after treatment is completed.

Remove pets, birds and cover fish aquariums before spraying.

PHYSICAL OR CHEMICAL HAZARDS

Extremely flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130 F may cause bursting. Do not use this product in or around electrical equipment due to possibility of shock hazard.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Keep out of lakes, ponds, or streams. Do not contaminate water when disposing of equipment washwater. Apply this product only as specified on this label.

DIRECTIONS FOR USE

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

Remove protective cap. Aim spray opening away from person. Push button to spray.

BEEF CATTLE OPERATIONS: In barns, close all windows and doors. Apply at the rate of 1 to 2 seconds per 1,000 cubic feet. Keep area closed for 15 minutes following application. For animal use, thoroughly spray entire animal as it is being released to pasture. Do not spray directly towards animal's face or eyes. Repeat application daily or as necessary.

POULTRY OPERATIONS: For poultry houses, close all windows and doors. Spray at the rate of 1 to 2 seconds per 1,000 cubic feet. Keep area closed for 15 minutes following application. Treat daily or as necessary.

HOME AND FOOD PROCESSING AREA USE: For flies, mosquitoes, small flying moths (millers), and gnats. Close all doors and windows. Point nozzle upward, direct the spray mist to all parts of the room, especially windows and other light sources which attract these insects. Fill the room with mist, then leave the treated areas. Keep the room closed for at least 15 minutes. Ventilate the room when treatment is completed. **Roaches, Waterbugs, Sowbugs, Spider and Centipedes:** spray thoroughly into hiding places such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas. **Spray directly on insects where possible. Repeat as necessary. Ants:** spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary. **To kill Bedbugs:** Apply as a spot treatment to cracks and crevices, around baseboards, floorboards, headboards and floors around sleeping area. Spray mattresses and box-springs lightly, around tufts, folds and seams and other areas that may harbor pests. Repeat as necessary, but no more than once per day.

STORED PRODUCT INSECTS (accessible stages): Flying Mediterranean flour moths, Indian meal (chocolate) moths, angoumois grain moths: Close doors and windows. Direct aerosol mist to all parts of the room, especially into dark enclosures and around stored product containers where adult moths may be resting. Use a minimum treatment of six to eight seconds per 1,000 cubic feet of space. Keep area closed for 30 minutes after each treatment. Repeat treatment weekly or as flying moths appear. Infested stored food products should be fumigated or treated with an approved product.

DAIRY FARM USE: Milking parlor and milk room. Close all windows and doors. Spray at the rate of 1 to 2 seconds per 1,000 cubic feet. If rooms cannot be closed, double the dosage. Stand in middle of room. Direct spray in all directions. Keep room closed for 15 minutes after treatment. Do not remain in treated area. Ventilate the area after treatment is completed. Cover milking utensils and milk to prevent contamination from spray and dead or falling insects.

DAIRY ANIMAL USE: From approximately 2 foot distance thoroughly spray entire animal as it is being released to pasture. Do not spray directly toward animal's eyes. Spot treat withers, shoulders and back where saliva accumulates from head tossing.

STANCHION BARN USE: Walk behind animals and direct spray over backs allowing 1 second per animal. For most effective results, apply each morning.

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HOG OPERATIONS: In hog houses, close all windows and doors. Apply at the rate of 1 to 2 seconds per 1,000 cubic feet. Keep area closed for 15 minutes following application. For animal application direct spray over backs and spray for 1 to 2 seconds per hog. Do not spray directly toward animal's face or eyes. Repeat application daily or as necessary.

HORSE BARN AND STABLES: In horse and pony barns close all windows and doors. Spray at the rate of 1 to 2 seconds per 1,000 cubic feet. Keep area closed for 15 minutes following application. Lightly mist over backs of horses and ponies from a distance of at least 2 feet. Do not spray directly toward horse's face or eyes. Repeat application daily or as necessary.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry place away from children, preferably a secure storage area.

CONTAINER 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.

NOTICE

It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Chem-Tech, Ltd., the manufacturer or seller. In no case shall Chem-Tech, Ltd., the manufacturer or seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the buyer.

Except as expressly provided herein, Chem-Tech, Ltd., the manufacturer or seller makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise with regard to the product sold, including, but not limited to, merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage. Buyer's or user's exclusive remedy, and Chem-Tech, Ltd., the manufacturer's or seller's total liability, shall be for damages not exceeding the cost of the product.

EPA Reg. # 47000-73

EPA Est. # 47000-IA-1

NET WGT. _____

Mfg. By
CHEM-TECH, LTD.
Des Moines, IA 50321