



47332-11

6/3/2005

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

JUN - 3 2005

Ms. Cassie Rothstrom
Chief Operation Officer
Walla Walla Environmental
P.O. Box 1298
4 West Rees
Walla Walla, WA 99362

Subject: Amendment - Add Corrugated Box Use
Bug-Juice Insecticide Paint Additive
EPA Registration No. 47332-11
Your Submission dated November 21, 2004

Dear Ms. Rothstrom:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two copies of revised finished labeling must be submitted prior to releasing the product for shipment.

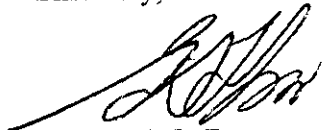
1. Revise the directions under corrugated cardboard use as follows:

CORRUGATED CARDBOARD

Bug-Juice Insecticide Additive provides residual protection to the outer surface of corrugated cardboard boxes against insect attack or infestation. This product is for Commercial/Industrial use and can only be applied during the manufacture of corrugated cardboard boxes. To protect the box from damage from crawling and flying insects, such as silverfish, cockroaches, ants and weevil, mix 2.1 fluid oz. Bug-Juice Insecticide Additive to outer coating for corrugated cardboard, by spray or blade to 6000 to 8000 square ft. of surface. **DO NOT APPLY TO INNER SURFACE OF BOXES.**

If you have any questions in regards to this letter please feel free to contact me at (703) 305-6100.

Sincerely,



George T. LaRocca
Product Manager
Insecticide Branch
Registration Division (7505C)

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BUG-JUICE INSECTICIDE PAINT ADDITIVE

Kills Crawling Insects When Exposed to Treated Surfaces. Kills Flying Insects Alighting on Treated Surfaces.

Net Contents 8 1/3 fl. oz. (250. ml)

Treats Five Gallons

ACCEPTED
with **COMMENTS**
In EPA Letter Dated:
JUN - 3 2005

CAUTION

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 47332-11

KEEP OUT OF REACH OF CHILDREN

Active Ingredient:

Deltamethrin: (s)-alpha-cyano-3-phenoxybenzyl-(1R,3R)-3-(2-2dibromovinyl)-2,2-dimethyl-cyclopropanecarboxylate.....4.75%

Inert Ingredients:.....95.25%

Total.....100.00%

EPA registration No. 47332 - 11

contains 0.42 lb. Deltamethrin per gallon

EPA Est. No. 47332-WA-01

Shake well before using.

READ ENTIRE LABEL BEFORE USING

PRECAUCION AL USUARIO: Si usted no lea ingles, no use este producto hasta que la etiqueta le haya sido explicada amplimente. (TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

PRECAUTIONARY STATEMENT: Hazardous to humans and domestic animals.

CAUTION: Harmful if inhaled. Avoid breathing vapors or spray mist. Contact with product may result in transient tingling and reddening of the skin. Remove contaminated clothing and wash before reuse.

First Aid Statement for Inhalation: 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-247-9011 for emergency medical treatment information.

DIRECTIONS FOR USE:

It is in violation of Federal law to use this product in a manner inconsistent with its labeling. In order to insure the efficacy of the formulated latex paint the amount of latex paint formulated should not exceed the amount that can be applied within three hours and all site application should be completed within the first three hours after mixing. For oil-based paint, stains, varnish or sealers, the amount of paint formulated should not exceed the amount that can be applied within 6 hours.

Do not allow children or pets to enter the treated area until surfaces are dry.

MIXING DIRECTIONS:

Add 1-2/3 fl. Oz. To 1 gallon of latex paint (water base), oil base paint, and stains or sealers, then mix well to insure proper dilution.

Equipment: Apply treated paint with brush, roller, or conventional airless equipment.

PEST CONTROL INDOOR:

Treatment Sites: This product, when used in accordance with label directions, Bug Juice Treated Paint may be applied in and on residential and non-residential buildings and structures including residential kitchens and all types of food/feed handling establishments. This product can be applied to non-food contact surfaces of walls, floors, ceilings, in and around cabinets, behind and beneath equipment and appliances, around floor drains, window and door frames and around plumbing, sinks and other possible pest harborage sites. The treated paint can be applied only as a crack and crevice or spot treatment indoors. Do not use for broadcast interior applications such as entire walls, ceilings, and floors. Permitted areas of use include, but are not limited to, the food/feed and non-food/non-feed areas of:

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|---------------------------------|---|
| Aircraft (cargo area only) | Industrial buildings |
| Apartment buildings | Installations |
| Bakeries | Kitchens |
| Bottling facilities | Laboratories |
| Breweries | Mausoleums |
| Buses | Meat, poultry and egg processing and packaging plants |
| Cafeterias | Mobile and motor homes |
| Candy plants | Nursing homes |
| Canneries | Offices |
| Dairy product processing plants | Railcars |
| Food manufacturing plants | Restaurants |
| Food processing plants | Schools |
| Food service establishments | Ships and vessels |
| Granaries and grain mills | Trailers |
| Hospitals | Trucks |
| Hotels | Warehouses |
| Houses | Wineries |

Do not apply to classrooms when in use. Do not use in aircraft cabins. 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 institutions including libraries, sports facilities, or in the immediate area when occupants are present.

Pantry Pest Control: To kill adult and accessible stages of insect pests: *Cockroaches and Ants*. Make application to cupboards, shelving and storage areas. Remove all foodstuffs, all utensils, shelf paper and other objects before painting with Bug Juice Treated Paint. Allow all treated surfaces to dry and cover shelves with clean paper prior to replacing foodstuffs, utensils or other items. Any foodstuff accidentally contaminated with any paint solution should be discarded.

Crawling Insect Pests (such as Cockroaches, Mosquitoes, Imported and Southern Fire Ants, Leafcutter Ants and Silverfish): Apply Bug Juice Treated Paint to localized areas of walls, ceilings and other resting areas as a crack and crevice or spot treatment. May be used

inside residential buildings, as well as in and around carports, garages, storage sheds, unoccupied horse stables and pet kennels.

Pet Kennels: For residual control of crawling and flying insects in and around these structures, apply as cracks and crevices or spot treatment. Optimal control results if facilities to be treated are clean, and painted surfaces are cleaned regularly (every 21 days). Apply only to areas of facility where animals are not present. Allow paint to dry before allowing re-entry of animals into treated areas. Do not apply to animal feed or watering equipment.

Food/Feed Handling Establishments: For control of all labeled pests, applications are permitted in food/feed and non-food/non-feed areas of food/feed handling and processing establishments as spot or crack and crevice treatment.

Food/Feed handling establishments are defined as places other than private residences in which exposed food/feed is held, processed, prepared or served. Included also are areas for receiving, storing, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) of food/feed. Serving areas where food/feed is exposed and the facility is in operation are also considered food/feed areas.

Non-Food/Non-Feed Areas: Examples of non-food/non-feed areas include garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, mop closets and storage (after packaging, canning or bottling). All areas that insects inhabit or through which insects may enter should be treated.

Do not use this application method in the food/feed handling areas of the facility when the facility is in operation or foods/feeds are exposed. Do not apply directly to food/feed products. Cover or remove all food/feed processing and/or handling equipment during application. After application in food/feed processing plants, cafeterias and similar facilities wash all equipment, benches, shelving and other surfaces which food/feed will contact. Clean food/feed handling or processing equipment and thoroughly rinse with clean, fresh water. After application in bakeries, clean all food contact surfaces thoroughly with appropriate equipment.

Spot or Crack and Crevice Applications: Except in federally inspected meat and poultry plants, spot or crack and crevice applications may be made while the facility is in operation, provided exposed food is covered or removed from area being treated prior to application. Do not apply directly to food or food-handling surfaces. In the home, do not allow paint to contact food/feed surfaces. If it does, clean surfaces with soap and water.

PEST CONTROL OUTDOOR

For Commercial/Industrial Use Only

Kills cockroaches in sewer manholes and related sanitary sites.

USE: Use to control cockroaches in manholes, sewers, sewer cleanouts, floor drains, and underground utility vaults. Apply product on manhole walls. Product may be applied via course spray using conventional airless spray equipment. Persons applying product in manhole must comply with CLOSED ENTRY requirements of government agencies.

Equipment: Apply treated latex paint with remote access application equipment.

Training: For sewer manholes and related sanitary sites, Walla Walla Environmental Inc. or its representatives will train and authorize all applicators in the proper use of Bug-Juice Insecticide Paint Additive.

Residual Application: Apply Bug Juice Treated Paint to surfaces of buildings, porches, window frames, eaves, patios and garages, to control American and German Cockroaches, Silverfish, Imported and Southern Fire Ants and Leafcutter Ants.

Do not apply to furniture, swing sets, or other outdoor playground articles.

CORRUGATED and CARDBOARD.

Bug-Juice Insecticide Additive provides residual protection of the outer surface of corrugated cardboard boxes against insect attack or infestation. This product is for Commercial/Industrial use only and can only be applied during the manufacture of corrugated cardboard boxes. For residual control of crawling and flying insects, such as silverfish, cockroaches, ants and weevil, mix 2.1 fluid oz. Bug-Juice Insecticide Additive to outer coating for corrugated cardboard, by spray or blade to 6000 to 8000 square ft. of surface. **DO NOT APPLY TO INNER SURFACE OF BOXES.**

ENVIRONMENTAL HAZARDS:

This product is toxic to fish, birds, and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment wash-water. Apply this product only as specified on this label.

PHYSICAL or CHEMICAL HAZARDS:

Do not use or store near heat or open flames. Do not ship or store with food, feeds, drugs or clothing.

STORAGE AND DISPOSAL:

Avoid extremes in temperature. Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Container Disposal: If empty, do not reuse this container. Place in trash or offer for recycling if available.

NOTICE: Seller warrants that the product conforms to its chemical descriptions and is reasonably fit for the purposes stated on the label.

Do not use open container except for immediate use.

Walla Walla Environmental, Inc.
P.O. Box 1298
Walla Walla, Washington 99362
(509) 522-0490