

47332-11

11-01-2011

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

NOV 1 2011

Ross Gilbert  
Walla Walla Environmental, Inc.  
c/o Pyxis Regulatory Consulting  
4110 136<sup>th</sup> St NW  
Gig Harbor, WA 98332

Subject: Notification per PRN 98-10 and PRN 2007-4

EPA Reg. No. 47332-11  
Bug-Juice Insecticide Additive

Date of Submission: September 28, 2011

Dear Mr. Gilbert:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 and PRN 2007-4 for the abovementioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and PRN 2007-4 and finds that the actions requested fall within the scope of the subject pesticide registration notices. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have questions regarding this letter, please contact Olga Odiott at (703) 308-9369.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Suarez".

Mark Suarez  
Product Manager 13  
Insecticide Branch  
Registration Division (7505P)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 47332-11	2. EPA Product Manager M. Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Walla Walla Environmental, Inc. / Bug-Juice Insecticide Additive	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Walla Walla Environmental, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated 9/15/2011	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Resubmission of notification of label changes per PR Notice 2007-4 per the Agency letter dated September 15, 2011. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1.66 oz, 8.3 oz		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ross Gilbert	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		<b>6. Date Application Received</b>  (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ross Gilbert	5. Date 9/28/2011	

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PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

September 28, 2011

COURIER DELIVERY

Mark Suarez (PM 13)  
Document Processing Desk (**NOTIF**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Walla Walla Environmental, Inc. – Bug-Juice Insecticide Additive (EPA Reg. No. 47332-11)  
Resubmission of Notification of Adoption of Storage and Disposal Language per PR Notice  
2007-4 per EPA letter dated September 15, 2011

Dear Mr. Suarez,

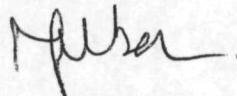
On behalf of Walla Walla Environmental, Inc., please find the enclosed resubmitted label notification for the adoption of Storage and Disposal language per PR Notice 2007-4 in accordance with the Agency's letter dated September 15, 2011.

In support of this resubmitted notification submission, please find the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. Copy of EPA letter dated September 15, 2011
3. One (1) copy of the Bug-Juice Insecticide Additive labeling with changes tracked
4. One (1) copy of the Bug-Juice Insecticide Additive labeling with changes incorporated
5. A CD containing an electronic version of the label
6. Certification with Respect to Label Integrity

Please feel free to contact me by phone (253) 853-7369 or by email at [Ross@PyxisRC.com](mailto:Ross@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ross Gilbert

Enclosures

cc: C. Rothstrom; Walla Walla Environmental, Inc.

cc: C. Rothstrom; Walla Walla Environmental, Inc.



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**BUG-JUICE  
INSECTICIDE 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  
**NOTIFICATION**

**CAUTION**  
**KEEP OUT OF REACH OF CHILDREN**

**NOV 01 2011**

**Active Ingredient:**

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

Inert Ingredients:.....95.25%

Total.....100.00%

EPA Registration No. 47332 - 11  
EPA Est. No. 47332-WA-01

Contains 0.42 lb. Deltamethrin per gallon

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 coating the amount of latex coating 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 coating, stains, varnish or sealers, the amount of coating 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 coating (water base), oil base coating, and stains or sealers, then mix well to insure proper dilution.

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

### PEST CONTROL INDOOR:

**Treatment Sites:** This product, when used in accordance with label directions, Bug Juice Treated Coating 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 coating 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:

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: Spiders, ticks, *cockroaches and ants*. Make application to cupboards, shelving and storage areas. Remove all foodstuffs, all utensils, shelf paper and other objects before coating with Bug Juice treated coating. 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 coating solution should be discarded.

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



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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 coated surfaces are cleaned regularly (every 21 days). Apply only to areas of facility where animals are not present. Allow coating 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 coating 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 coarse spray using conventional airless spray equipment. Persons applying product in manhole must comply with CLOSED ENTRY requirements of government agencies.

**Equipment:** Apply treated latex coating 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 Coating Additive.

**Residual Application:** Apply Bug Juice Treated Coating to surfaces of buildings, porches, window frames, eaves, patios and garages, to control Spiders, Ticks, 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.**

#### **For Commercial/Industrial Use Only**

Bug-Juice Insecticide Additive provides residual protection to the outer surface of corrugated and cardboard (folding carton) boxes against insects that damage or feed on paper, corrugated or cardboard (folding carton). To protect the outer surface of the box from damage from insects, such as spiders, ticks, silverfish, cockroaches, ants and weevil, mix 2.1 fluid oz. Bug-Juice Insecticide Additive to coating for corrugated or cardboard (folding carton). This coating can only be applied to the outside of the corrugated or cardboard (folding carton) box or to corrugated or cardboard (folding carton) box liner that is to be used for the exterior portion of the corrugated or cardboard (folding carton) box. Such means of application include size press, rod, blade, air knife, offset press, gravure and flexography at a rate of one gallon of coating containing Bug Juice Insecticide Additive to 6000 to 8000 square ft. of surface. **DO NOT APPLY TO INNER SURFACE OF BOXES.**

#### **ENVIRONMENTAL HAZARDS:**

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.

#### **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.

[Household and residential use]

### **STORAGE AND DISPOSAL**

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

**Pesticide Storage:** Store product in original container in a cool, dry, locked place out of reach of children. Store away from food and pet food.

**Container Handling:** Nonrefillable container. Do not reuse or refill this container. If empty: 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.

[For uses other than household or residential]

## STORAGE AND DISPOSAL

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

**Pesticide Storage:** Store product in original container in a cool, dry, locked place out of reach of children. Store away from food and pet food.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility

**Container Handling:** Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**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

Rev. 09/28/2011

