



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 22, 2024

Lisa Adamson, Regulatory Manager
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: Notification per PRN 98-10 – Addition of optional marketing graphics/icons
Product Name: CSI 17-216 H-N-P Foam
EPA Registration Number: 53883-475
Application Date: February 28, 2024
Case Number: 501982

Dear Lisa Adamson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “NOTIFICATION” and placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, please contact Christopher Taylor at 202-566-2928 or at taylor.christopher.m@epa.gov.

Sincerely,

CHRISTOPHER TAYLOR Digitally signed by CHRISTOPHER TAYLOR
Date: 2024.03.25 10:03:00 -04'00'

For, Tamica Cain, Product Manager 10
Invertebrate & Vertebrate Branch 2
Registration Division (7505T)

NOTIFICATION

53883-475

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

03/22/2024

[Text in brackets and italics are notes to the label editor.]

[Text in brackets alone are optional statements or alternative statements.]

HYDROPRENE	GROUP	7A	INSECTICIDE
NOVALURON	GROUP	15	INSECTICIDE
PYRIPROXYFEN	GROUP	7	INSECTICIDE

CSI 17-216 H-N-P Foam

[For Indoor Use Only] [Pressurized Solutions] [Dry Foam] [Insect Growth Regulator]
[ABN: Tekko® Trio Foam]

ACTIVE INGREDIENTS:

(S)-Hydroprene 0.36%
 Novaluron 0.02%
 Pyriproxyfen 0.02%

OTHER INGREDIENTS: 99.6%

TOTAL: 100.00%

[FOR INTERNAL PURPOSES ONLY – NOT TO BE INCLUDED ON THE LABEL: 1 second of spray contains 1.5 grams of product; 0.0054g (S)-Hydroprene, 0.0003g Novaluron, 0.0003g Pyriproxyfen]



ADAMA

Consumer & Professional Solutions

Manufactured for:
Control Solutions, Inc.
5903 Genoa Red Bluff
Pasadena, TX 77507

EPA Reg. No: 53883-475

EPA Est. No: _____

Net Contents: _____

SHAKE WELL BEFORE USE.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

[Alternate text – all or in part: See side panel(s) for First Aid, Precautionary Statements, Directions for Use and Storage and Disposal.]

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

DIRECTIONS FOR USE

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

Restrictions

- For indoor use only, DO NOT use outdoors. READ ALL DIRECTIONS COMPLETELY BEFORE USE.

Resistance Management

For resistance management, this product contains Group 7, 7A and 15 insecticides. Any insect population may contain individuals naturally resistant to this product and other Group 7, 7A and 15 insecticides. The resistant individuals may dominate the insect population if this group of insecticides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

To delay insecticide resistance, take the following steps:

- Use take mixtures with insecticides from a different group that are equally effective on the target pest when such use is permitted. Do not rely on the same mixture repeatedly for the same pest population. Consider any known cross-resistance issues (for the targeted pests) between the individual components of a mixture. In addition, consider the following recommendations provided by the Insecticide Resistance Action Committee (IRAC):
 - Individual insecticides selected for use in mixtures should be highly effective and be applied at the rates at which they are individually registered for use against the target species.
 - Mixtures with components having the same IRAC mode of action classification are not recommended for insect resistance management.
 - When using mixtures, consider any known cross-resistance issues between the individual components for the targeted pest(s).
 - Mixtures become less effective if resistance is already developing to one or both active ingredients, but they may still provide pest management benefits.
 - The insect resistance management benefits of an insecticide mixture are greatest if the two components have similar periods of residual insecticidal activity. Mixtures of insecticides with unequal periods of residual insecticide activity may offer an insect resistance management benefit only for the period where both insecticides are active.
- Adopt an integrated pest management program for insecticide use that includes scouting, uses historical information related to pesticide use, crop rotation, record keeping, and which considers cultural, biological and other chemical control practices.
- Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, consult with your local university specialist or certified pest control advisor.
- Contact your local extension specialist or certified crop advisor for any additional pesticide resistance-management and or IPM recommendations for the specific site and pest problems in your area.
- For further information or to report suspected resistance contact your local extension specialist or sales representative.

PRODUCT INFORMATION

CSI 17-216 H-N-P Foam contains three Insect Growth Regulators in a dry foam formulation. The dry foam formulation reduces the chances of missed areas and ensures complete coverage of an area. The IGRs in

CSI 17-216 N-H-P Foam disrupt the normal development of immature cockroaches, drain flies, fruit flies, bed bugs, fleas, and stored product pests (examples of these pests include: Indian meal moths, rice moths, tobacco moths, red flour beetles, confused flour beetles, lesser grain borers, merchant grain beetles, saw-tooth grain beetles, warehouse beetles, cigarette beetles, and Dermestid beetles). CSI 17-216 H-N-P Foam prevents future generations of bed bugs and cockroaches. CSI 17-216 H-N-P Foam also disrupts the normal life cycle of drain flies, fruit flies, and stored product pests; thus, killing these insects during the pupal stage. In both cases, the cycle of an infestation ends.

Use in areas including: apartment buildings, bakeries, bottling facilities, breweries, boiler rooms, cafeterias, candy plants, grocery stores, day care centers, hospitals, residential homes, hotels/motels, office buildings, kitchens, laboratories, cereal processing facilities, manufacturing plants, mausoleums, meat and produce canneries, nursing homes, restaurants, schools, locker rooms, stores, taverns, warehouses, pet stores, as well as various modes of transportation, such as aircraft cargo areas and galleys, buses, trucks, trailers, rail cars, and marine vessels.

Use as a surface spray, spot, or crack and crevice application.

Prior to using in commercial or residential food areas, please refer to the Food Handling Establishment Applications section of the label. The preparations prior to treatment and the clean-up after application described are also to be followed for residential use.

CSI 17-216 H-N-P Foam is non-repellent and should be considered an important component in a cockroach baiting program. Baits are an important part of a total cockroach control program but are not a complete solution. CSI 17-216 H-N-P Foam can reach those nymphs that fail to forage to baits and the IGRs stimulate egg-bearing females to leave the harborage and feed.

CSI 17-216 H-N-P Foam is a ready-to-use pressurized spray for application to a variety of locations and surfaces to control pests. Apply as a surface spray, spot, or crack and crevice application. Use the supplied fold up extension tube for crack and crevice applications.

To apply as a surface or spot application, hold can 10" to 12" away from surface to be treated. Use a sweeping motion over the surface to be treated for complete coverage. Product applies as a dry foam that stays where you spray and does not run.

For crack and crevice applications, use the supplied fold up extension tube and apply to wall voids, hollow table legs, tube iron, gondola frames, voids, supports and other areas where pests may harbor. CSI 17-216 H-N-P Foam is generally nonstaining, but in questionable situations, apply a small amount in an inconspicuous location. Apply once a month for continuous protection, or more often if conditions warrant.

SURFACE APPLICATION

Apply foam on surfaces at a rate of [15 ounces per 1125 sq ft] [16 ounces per 1200 sq ft] of surface area. Apply to areas such as: walls, floors, ceilings, attics, basements, gondolas, shelving and other areas where pests may harbor. The dry foam formulation will adhere to the undersides of shelving, cabinets, drawers, and other areas pests accumulate. Treat these areas thoroughly.

SPOT OR CRACK AND CREVICE APPLICATIONS

Apply dry foam as a crack and crevice application using the supplied fold up extension tube. Apply directly to areas such as: wall voids, pipe chases, crevices, false ceilings and other areas where pests may harbor. Apply spot treatments to areas such as: storage areas, closets, around water pipes, doors, windows, and behind and under appliances/equipment, furniture and beds. The dry foam formulation allows penetration deep into cracks and crevices to reach infestations that are not observed.

CONTROL OF BEDBUGS

To treat bedbugs, apply to harborage points mentioned above; in addition, under beds, bottom side of box springs, under and behind night stands, to points where carpet and wall meet, cracks in cove base, molding,

and other areas where bed bugs harbor. The foam formulation reduces the chances of missed harborage areas. Retreat at 14 days for heavy infestations.

Restrictions

- Do not treat linens and mattresses

CONTROL OF FLEAS

The active ingredients in this product are (S)-hydroprene, Novaluron and Pyriproxyfen, which are insect growth regulators. Insect growth hormones are naturally occurring in insects and this product prevents the adult pest from developing. These properties will gradually result in the reduction and eventual control of the pest infestation. Flea eggs and flea larvae that come into contact with this product will also not develop into adult fleas. This product works for up to 7 months on fleas by inhibiting the development of the immature stages of the flea and preventing them from reaching the biting adult stage. This product does not work on adult fleas and flea pupae that already exist.

Use Sites	Use Directions
Surface Application	For use on carpets, furniture, pet sleeping areas & throw rugs, etc. Repeat treatment every 7 months as necessary. If needed, repeat treatments may be made 21 days after previous treatment.

WAREHOUSES (NON-FOOD) APPLICATIONS

Apply as a surface, spot, or crack and crevice treatment in non-food storage warehouses. Apply to all areas that may harbor pests, including under and between pallets. Apply foam to undersides of shelving and storage areas.

FOOD HANDLING ESTABLISHMENT APPLICATIONS

Apply as a surface spray, spot, or crack and crevice treatment in both food and non-food areas of food handling establishments. These establishments are defined as: places other than private residences where exposed food is held, prepared, processed, or served. It also includes areas where food items are: received, prepared, packaged, and stored, as well as enclosed food processing systems (mills, dairies, etc.).

For control of drain flies and fruit flies: Apply to areas of fly breeding. For drains, apply foam into and around the downspout and catch basin area. Coat these areas thoroughly as fly larva develop in the scum buildup on the sides of drain pipes. Visible foam formulation ensures no areas are missed. Repeat applications at 2 to 4 week intervals depending upon the severity of infestation.

SPOT OR CRACK AND CREVICE APPLICATIONS

Prior to application, remove or cover all food items in area to be treated. Do not apply directly to food or food-handling surfaces, but applications may be made above these areas due to the no-drip formulation. Spot or crack and crevice applications can be made while facility is in operation.

SURFACE SPRAY APPLICATION RESTRICTION: Do not apply directly to food products.

AREA TREATMENTS: Prior to application, remove or cover all food items.

PARTIAL AREA TREATMENTS: For applications during facility operation, apply to partial areas of food handling establishments in cases of small or localized infestations.

PANTRY/CABINETS, SMALL FOOD STORAGE AREAS

Apply foam as a surface spray, crack and crevice spray, or spot treatment to pantry and cupboard shelves or other areas where food is stored. Be sure to treat the undersides of shelving.

Restrictions

- Prior to spraying, remove all food containers and foodstuffs
- Do not replace food containers or foodstuffs until spray has dried
- Dispose of any infested food packages or materials

WAREHOUSES (FOOD)

Apply as a surface spray, spot, or crack and crevice treatment in warehouses where packaged food items are stored in such a way that direct contact with the foodstuff is not anticipated.

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store upright at room temperature. Do not store near heat or open flame. Store in an area away from children and pets.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Do not puncture or incinerate! Non-refillable 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.

LIMITATIONS OF LIABILITY

To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Control Solutions, Inc.'s election, the replacement of the product.

{Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.}

OPTIONAL MARKETING CLAIMS:

{Note to Reviewer: The following marketing claims are optional. When two or more items appear in brackets, at least one of the items in brackets will be used when appropriate in order for the claim to be clear to product users. Optional claims and statements may be presented on the container or collateral labeling}

Statements

- Three/3 modes of action
- Intended for Pest Control Operators and Commercial Use Only
- Dry foam formulation stays where you apply
- Application won't drip or fall from vertical surfaces [or the undersides of prep tables]
- Combination Chemistry™ [from Control Solutions][, Inc.]
- Pressurized Combination Chemistry™ [from Control Solutions][, Inc.]
- For use in the home and in Food and Non-food areas of Restaurants, Food Processing Plants, Food and Non-Food Warehouses, Grocery Stores and Supermarkets, Schools, Office Buildings, Apartments, Hotels and Motels, Hospitals, Tobacco Plants and Warehouses, Manufacturing Plants, Commercial and Industrial Buildings, Transportation Equipment [Automobiles, Boxcars, Buses, Boats, Trucks, Railcars, Ship Cargo Holds], and outside on Lawns and Building Perimeters. Do not use in aircraft.
- CSI 17-216 H-N-P Foam stops fleas and cockroaches from developing into egg laying adults
- CSI 17-216 H-N-P Foam prevents fleas and cockroaches from developing into egg laying adults
- Continuous protection against stored product pests for 3 months
- Labeled for use in food areas of food handling establishments.

- For control of Fleas, Cockroaches, Crickets & Non-Biting Gnats
- With three Insect Growth Regulators
- With triple Insect Growth Regulators
- Aerosol with three Insect Growth Regulators
- Aerosol with triple Insect Growth Regulators
- CSI 17-216 H-N-P Foam contains three active ingredients
- CSI 17-216 H-N-P Foam contains insect growth regulators
- With three Active Ingredients
- With triple Active Ingredients
- Formulation with three Active Ingredients
- Formulation with triple Active Ingredients

Flea Claims

- Prevents hatching fleas from becoming full grown biting adults
- Stops hatching fleas from becoming full grown biting adults
- Prevents hatching fleas from developing into biting adults
- Stops hatching fleas from developing into biting adults
- Prevents pre-adult (larval) fleas from becoming full grown biting adults
- Stops pre-adult (larval) fleas from becoming full grown biting adults
- Prevents pre-adult (larval) fleas from developing into biting adults
- Stops pre-adult (larval) fleas from developing into biting adults
- Prevents hatching eggs(larvae) from becoming full grown biting adults
- Stops hatching eggs(larvae) from developing into biting adults
- Prevents hatching eggs(larvae) from developing into biting adults
- Stops hatching eggs(larvae) from becoming full grown biting adults
- One treatment works for up to 210 days against hatching fleas (pre-adult (larval) fleas) hatching eggs (larvae)
- One treatment works for up to 30 weeks against hatching fleas (pre-adult (larval) fleas) hatching eggs (larvae)
- One treatment works for up to 7 months against hatching fleas (pre-adult (larval) fleas) hatching eggs (larvae)
- Prevents [new] [tomorrow's] fleas from growing up to bite
- CSI 17-216 H-N-P Foam activity keeps working for up to 210 days
- CSI 17-216 H-N-P Foam activity keeps working for up to 30 weeks
- CSI 17-216 H-N-P Foam activity keeps working for up to 7 months
- Prevents larval fleas from developing into the biting adult stage
- Effective control for up to 210 days
- Effective control for up to 30 weeks
- Effective control for up to 7 months
- Controls immature stages of fleas.
- Stops immature stages of fleas.
- Kills immature stages of fleas.
- Prevents immature stages of fleas.
- Prevents the emergence of adult fleas
- Stops the emergence of adult fleas
- Flea eggs deposited on treated areas will not develop into adult fleas
- Larvae crawling onto treated areas will not develop into adult fleas
- CSI 17-216 H-N-P Foam acts on the immature life stage of the flea, preventing it from developing into biting adults
- Prior to the flea season, previously known infested areas can be pretreated to reduce the developing infestation
- Inhibits reinfestation by fleas for up to 210 days
- Inhibits reinfestation by fleas for up to 30 weeks
- Inhibits reinfestation by fleas for up to 7 months

- If adult fleas are introduced from untreated areas, their offspring will not become biting adult
- Kills pre-adult (larval) fleas, for up to 210 days
- Kills pre-adult (larval) fleas, for up to 30 weeks
- Kills pre-adult (larval) fleas, for up to 7 months
- CSI 17-216 H-N-P Foam , the [less than] twice a year flea treatment
- Two applications per year, keep fleas under control
- Disrupts the life cycle of fleas
- Combine CSI 17-216 H-N-P Foam with a[n] [flea] adulticide for control [of fleas]

Cockroach Claims

- CSI 17-216 H-N-P Foam keeps working on cockroaches for up to [180 days] [26 weeks] [6 months]]
- Interrupts the life cycle of cockroaches
- Breaks the life cycle of cockroaches
- Inhibits reinfestation by cockroaches for 180 days
- Inhibits reinfestation by cockroaches for 26 weeks
- Inhibits reinfestation by cockroaches for 6 months
- Effectively controls cockroach infestations by preventing future generations
- Prevents nymphal cockroaches from becoming adults
- Stops nymphal cockroaches from becoming adults
- Inhibits nymphal cockroaches from becoming adults
- Prevents nymphal cockroaches from becoming breeding adults
- Stops nymphal cockroaches from becoming breeding adults
- Inhibits nymphal cockroaches from becoming breeding adults
- Prevents nymphal cockroaches from becoming reproductive adults
- Stops nymphal cockroaches from becoming reproductive adults
- Inhibits nymphal cockroaches from becoming reproductive adults
- Prevents nymphal cockroaches from becoming egg laying adults
- Stops nymphal cockroaches from becoming egg laying adults
- Inhibits] nymphal cockroaches from becoming egg laying adults
- One treatment stops cockroaches from generating reproductive offspring for up to 180 days
- One treatment stops cockroaches from generating reproductive offspring for up to 26 weeks
- One treatment stops cockroaches from generating reproductive offspring for up to 6 months
- Effectively breaks the cockroach life cycle
- Prevents future generations of cockroaches
- Breaks the life cycle of cockroaches
- Stops cockroaches from molting

Fly Claims

- Reduces egg production in houseflies and prevents development of larvae (maggots) into adults
- Breaks the life cycle of houseflies
- Breaks the life cycle of drain flies
- Breaks the life cycle of fruit flies

Bed Bug Claims

- Controls bed bugs
- Kills bed bug infestations
- Breaks the life cycle of bed bugs
- Bed bug life cycle control
- Breaks the bed bug life cycle
- Effectively controls bed bug infestations by preventing development [thereby preventing future generations]

Efficacy Claims

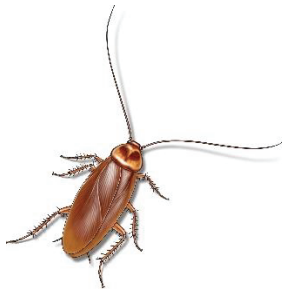
- Breaks the life cycle of stored product pests
- Reaches breeding infestations you cannot see

Optional Images:

[Drain Flies]



[Cockroaches]



[Cockroaches and Drain Flies]

