



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OCT 25 2004

Janice K. Sharp, Ph.D.
Valent BioSciences Corporation
870 Technology Way, Suite 100
Libertyville, IL 60048

Subject: Label Amendment - Response to Agency's September 17, 2003 letter
PyraPerm Insect Killer WBA N66
EPA Reg. No. 73049-322
Your Submission Dated January 16, 2004

Dear Dr. Sharp:

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 listed 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. Revise the Precautionary Statements to read as follows:

"Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Frequent or repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash clothing before reuse."

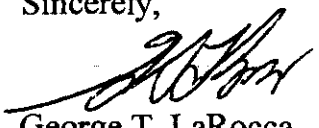
2. Under Environmental Hazards revise the first sentence to read "This pesticide is toxic to fish and other aquatic organisms."

3. Replace "Not for use in USDA meat and poultry plants" with "Not for use in Federally Inspected meat and poultry plants".

- 4. Delete the word "highly" form the statement "... broad spectrum insecticide highly effective"

Note, the inhalation study submitted to revise the current tox category (category III) is acceptable and meets the criteria for toxicity category IV. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)



3 7 5

ACCEPTED
with COMMENTS
In EPA Letter Dated
OCT 25 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
73049-322

PYRAPERM®

INSECT KILLER WBA N66

- FOR HOUSEHOLD AND COMMERCIAL/AGRICULTURAL USE IN NON-FOOD/NON-FEED AREAS OF INDUSTRIAL AND INSTITUTIONAL BUILDINGS: HOMES, SCHOOLS, WAREHOUSES, OFFICE BUILDINGS, THEATERS, GARAGES, HOTELS, MOTELS.
- CONTAINS PYRENONE® AND PERMANONE®.
- CONTROLS RESIDENTIAL, INDUSTRIAL AND GARDEN INSECTS.
- A BROAD SPECTRUM INSECTICIDE HIGHLY EFFECTIVE AGAINST ANTS, CARPENTER ANTS, BEES, CARPET BEETLES, CENTIPEDES, CLOVER MITES, COCKROACHES, CRICKETS, DEER TICKS, EARWIGS, FIREBRATS, FLEAS, FLOUR BEETLES, GRAIN BEETLES, GROUND BEETLES, MILLIPEDES, MOLE CRICKETS, MOTHS, PILLBUGS, SCORPIONS, SILVERFISH, SOWBUGS, SPIDERS, TICKS, WASPS AND OTHER LISTED PESTS.

ACTIVE INGREDIENTS:

Pyrethrins 0.20%
Piperonyl Butoxide* 1.00%
Permethrin** 0.10%

OTHER INGREDIENTS: 98.70%
100.00%

*Equivalent to min. 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% related compounds.

**Cis/trans ratio: min. 35% (+/-) cis and max. 65% (+/-) trans.

PRECAUCION AL CONSUMIDOR: Si usted no lee 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.)

EPA REG. NO. 73049-322

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN

CAUTION

**SEE SIDE PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS**

NET CONTENTS:

FIRST AID	
If on Skin or Clothing:	<ul style="list-style-type: none"> • 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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of medical emergencies or health and safety inquiries or in case of fire, leaking or damaged containers, information may be obtained by calling 1-877-315-9819.	

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

CAUTION

Avoid contact with skin or clothing. Frequent or repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

Environmental Hazards

This product is toxic to fish. Do not apply directly to any body of water.

Physical and 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 apply this product in conduits, motor housings, junction and switch boxes or other electrical equipment because of possible shock hazard. Do not use on surfaces that can be harmed or stained by water.

DIRECTIONS FOR USE

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

Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before spraying. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

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.

Not for use in USDA meat and poultry plants.

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

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

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use. Do not use on electrical equipment or on surfaces that can be harmed or stained by water.

SHAKE WELL BEFORE USING

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches. Remove birds and cover fish aquariums before spraying.

INDOORS:

Houseflies, Fruit Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees, Black Flies, Skipper Flies, Blow Flies and Small Flying Moths: Close all doors and windows and direct spray upward into center of room with a slow sweeping motion. Spray 5-10 seconds for average room, moving toward the door. Direct spray to all parts of the room, especially windows and other light sources which attract these insects. Keep nozzle in constant motion. Leave room and keep closed for 15 minutes after spraying. Ventilate room thoroughly before re-entry. Sweep up and discard fallen insects.

Cockroaches, Waterbugs, Palmetto Bugs, Silverfish, Firebrats, Crickets, Scorpions, Spiders, Millipedes, Centipedes, Sowbugs and Pillbugs: 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.

Ants: Spray trails, nests and points of entry. Spray on ants where possible.

Indian Meal Moths, Angoumois Grain Moths: Close doors and windows, direct spray into all parts of room especially around stored food product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1000 cubic feet of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment.

Exposed stages of Confused Flour Beetles, Saw-Toothed Grain Beetles, Red Flour Beetles, Rice Weevils, Granary Weevils, Grain Mites: Spray into cracks and crevices, processing and handling equipment, around cartons or containers or other areas where these insects tend to congregate. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. Dispose of infested stored food products in the home.

Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves and carpets.

Bedbugs: Spray mattresses, particularly around tufts and seams. Take beds apart and spray into all joints. Treat baseboards, moldings and floors. Allow all sprayed articles to dry thoroughly before use.

TO CONTROL **Clothes Moths** and **Carpet Beetles** on wool and other proteinaceous fibers: Remove infested articles from storage, brush thoroughly, and air for several hours in sunlight,

if possible. Apply spray liberally to empty chests, closets, bureaus and other storages directing the spray into cracks, joints and crevices. After airing, infested articles may be treated by spraying lightly, keeping nozzle at least three feet from fabric to avoid staining.

OUTDOORS:

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Allow a few minutes for product to take effect. Spray with wind if breeze is blowing. Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use. Do not use on edible crops.

FLYING INSECTS: Flies, Mosquitoes, Gnats, Small Flying Moths, Hornets and Yellow Jackets. Allow fog to drift over area. Direct spray toward bushes, or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles.

CRAWLING INSECTS: Ants, Cockroaches, including Asian Cockroaches, Crickets, Centipedes and Silverfish. Hold can two (2) to three (3) feet from surface to be treated and spray in infested surface of patio or picnic area, hitting as many insects as possible. Spray to slightly moisten the surface. Also spray legs of tables and chairs to repel *ants*. Spray ant hills for best control.

FOR THE CONTROL OF GARDEN INSECTS: For use on roses, dahlias, asters and other ornamentals to kill *Japanese Beetles* hit by spray, as well as *Whiteflies, Aphids, Exposed Thrips, Spiders, Red Mites* and *Leafminers*. Not for use on plants being grown for sale or other commercial use or for commercial seed production or for research purposes.

May be used on plants, as well as a multi-purpose spray in small gardens and for spot treatments of incipient insect infestations to prevent spreading in large garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against *Whiteflies, Aphids, Spiders and Red Mites, Exposed Thrips, Lace Bugs, Japanese Beetles, Pavement Ants, Clover Mites* and *Armyworms*. When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Spray in one second bursts. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. Contact insects directly whenever possible.

STORAGE AND DISPOSAL
Storage: Store in a cool, dry area. Do not transport or store below 32°F.
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.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. 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 Valent BioSciences Corporation. All such risks shall be assumed by the user or buyer.

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