73049-324

10/25/2004

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

-FIGURE PREVENTION PENHODES AND 1604 SUBSTANCES

OCT 2 5 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 N67A

EPA Reg. No. 73049-324

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. Add the following statement to the "Directions for Use" section: "Do not apply to institutions (including libraries, sports facilities, etc.,) in the immediate area when occupants are present."

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)



ACCEPTED with COMMENTS In EPA Letter Dated OCT 2 5 2004

Under the Federal Insecticide. Fungicide, and Rodanticide Act, as amended, for the pesticide registered under EPA Reg. No.



PYRAPERM®INSECT KILLER WBA N67A

- FOR HOUSEHOLD AND COMMERCIAL/AGRICULTURAL USE
- CONTAINS PYRENONE® AND PERMANONE®
- A BROAD SPECTRUM AQUEOUS INSECTICIDE WHICH KILLS ANTS, BED BUGS, BOOKLICE, CARPENTER ANTS, CARPET BEETLES, CENTIPEDES, CIGARETTE BEETLES, CLOVER MITES, CLUSTER FLIES, COCKROACHES, CONFUSED FLOUR BEETLES, CRICKETS, DRUG STORE BEETLES, FLEAS, FLIES, FRUIT FLIES, GNATS, GRAIN MITES, GRANARY WEEVILS, HORN FLIES, HOUSEFLIES, LICE, MILLIPEDES, MOSQUITOES, MUD DAUBERS, RED FLOUR BEETLES, RICE WEEVILS, SAWTOOTHED GRAIN BEETLES, SILVERFISH, SMALL FLYING MOTHS, SOWBUGS, SPIDERS, STABLE FLIES, TICKS AND WASPS.

ACTIVE INGREDIENTS:

Pyrethrins							
Piperonyl Butoxide*		 					. 1.250%
Permethrin**		 					. 0.125%
OTHER INGREDIENTS:		 					98.375%
							100.000%

^{*}Equivalent to min. 1.0% (butylcarbityl)(6-propylpiperonyl) ether and 0.25% related compounds.

PRECAUCION AL USUARIO: 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. 73049-324

EPA EST. NO.

CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS

FIRST AID

lf 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.

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

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.

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.

Environmental Hazards

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

DIRECTIONS FOR USE

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

For use in homes, beef cattle operations, campgrounds, dairy farms (including milk house, milk parlor, loading sheds and holding lot), hog operations, horse barns and stables, kennels, poultry operations, utilities, vehicles and the non-food/feed areas of canneries, food storage areas, hospitals (non-occupied patient areas), hotels, motels, resorts, restaurants and other food handling establishments, schools, supermarkets, warehouses, and other commercial and industrial buildings.

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 on dogs or cats.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commer-

NET CONTENTS:

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

cially 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.

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.

SHAKE WELL BEFORE USING

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches.

NON-AGRICULTURAL USES:

Cluster Files, Housefiles, Fruit Files, Mosquitoes, Gnats, Wasps, Hornets, Bees, Black Files, Skipper Files, Blow Files and Small Flying Moths: Close all doors and windows and spray at the rate of 1 to 3 seconds per 1000 cubic feet, moving toward the door. Fill room with mist. 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 area closed for 15 minutes. Open and ventilate before reoccupying. Sweep up and destroy fallen insects.

Ants, Cockroaches, Waterbugs, Palmetto Bugs, Silverfish, Firebrats, Clover Mites, Crickets, Scorpions, Spiders, Millipedes, Centipedes, Sowbugs and Pillbugs: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, meter boxes, door frames, windows, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible. Space spray: Open cabinets and doors in area to be treated. Shut off air conditioners, fans and close doors and windows before spraying. Spray at a rate of 20 seconds per 1000 cu. ft. of space, moving toward the door. Direct spray toward area suspected of harboring the greatest insect infestations. Disperse in all locations contacting as many insects as possible. Leave room and keep area closed for 15 minutes. Open and ventilate before reoccupying. Sweep up and destroy dead insects.

Indian Meal Moth, Chocolate Moth, Mediterranean Flour Moth, Angoumols Grain Moth: Close all doors and windows and 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. Open and ventilate before reoccupying. Sweep up and destroy fallen insects.

EXPOSED STAGES OF Confused Flour Beetles, Cigarette Beetles, Drug Store Beetles, Saw-Toothed Grain Beetles, Red Flour Beetles, Rice Weevils, Granary Weevils, Grain Mites in Exposed Adult and Larvae Stages: Spray into cracks and crevices, processing and handling equipment, around cartons or containers or other areas where these insects tend to congregate. Contact as many insects as possible. Spray 30 seconds for each 100 square feet of surface. Keep area closed

for 45 minutes to 1 hour after treatment. Space spray: Spray 20 seconds per 1000 cu. ft. of space, moving toward the door. Leave room and keep area closed for 15 minutes following treatment. Dispose of infested stored food products or treat using an approved product intended for this purpose.

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.

Mud Daubers and **Wasp Nests:** Spray mist directly on insects and their nests from approximately 2 feet away. Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Spray into hiding and breeding places contacting as many insects as possible.

Fleas IN BUILDINGS - Directed spray: Hold can 36 inches above floor and direct spray toward floor and lower walls at a rate of 10 seconds per 100 sq. ft. making sure that all floor, sofa and chair surfaces are contacted. Leave room and keep area closed for 15 minutes. Open and ventilate before reoccupying. Allow all sprayed articles to dry thoroughly before use. Repeat treatment after 7 days if needed.

Ticks (Adults and Larvae): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering, with special attention to cracks and crevices around baseboards, and window and door frames. Infested upholstered furniture may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

AGRICULTURAL USES:

TO CONTROL Bees, Deer Files, Face Files, Fleas, Gnats, Horn Files, Hornets, Horse Files, Housefiles, Lice, Mosquitoes, Small Flying Moths, Stable Files, Ticks and Wasps: IN DAIRY FARMS MILKING PARLOR AND MILK ROOM: Cover milking utensils and milk to prevent contamination from spray and falling dead insects. Close windows and doors and direct fog upward in all directions at a rate of 1 to 3 seconds per 1000 cubic feet of space, moving toward the door. Leave room and for best results, keep area closed for 15 minutes after spraying. Remove animals (livestock) prior to space spraying indoors. Do not remain in treated area. Open and ventilate after treatment is completed.

LIVESTOCK USE (DO NOT USE ON SICK ANIMALS) - From approximately 2 feet away, 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. Apply for 2 to 4 seconds per animal. Repeat daily or as needed.

TO CONTROL **Blood Sucking Lice**, apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

IN STANCHION BARNS

Walk behind animals and direct spray over backs allowing 1 second per animal. Apply each morning for best results.

IN BEEF CATTLE, GOAT AND SHEEP OPERATIONS, HORSE BARNS AND STABLES: Remove animals (livestock) prior to space spraying indoors. Close all windows and doors, and spray at a rate of 1 to 2 seconds per 1000 cu. ft. If area cannot be closed, double the dosage. Leave room and keep area closed for 15 minutes following application. Ventilate area after treatment is complete.

FOR ANIMAL APPLICATION (do not use on sick animals) - from approximately 2 feet away, thoroughly spray entire animal, preferably as it is being released to pasture. Do not spray directly toward animal's face or eyes. Apply for 2 to 4 seconds per animal. Repeat daily or as needed.

TO CONTROL **Blood Sucking Lice**, apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

IN POULTRY OPERATIONS:

Use only in unoccupied poultry houses when birds are not present. Close all windows and doors, and spray at a rate of 1 to 2 seconds per 1000 cu. ft, moving toward the door. If area cannot be closed, double the dosage. Leave room and keep area closed for 15 minutes following application. Ventilate area after treatment is complete. Treat daily or as needed.

TO CONTROL **Poultry Lice**, spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

FOR CONTROL OF **Bedbugs** and **Mites** in poultry houses, spray crevices of roost poles, cracks in walls, and cracks in nests where the **bedbugs** and **mites** hide.

IN HOG OPERATIONS: Remove animals (livestock) prior to space spraying indoors. Close windows and doors and direct fog upward in all directions at a rate of 1 to 2 seconds per 1000 cubic feet of space, moving toward the door. If area cannot be closed, double the dosage. Leave room and for best results, keep area closed for 15 minutes after spraying. Do not remain in treated area. Open and ventilate after treatment is completed.

HOG APPLICATION (DO NOT USE ON SICK ANIMALS) - From approximately 2 feet away, thoroughly spray entire animal as it is being released to pasture. Do not spray directly toward animal's face or eyes. Spot treat withers, shoulders and back where saliva accumulates from head tossing. Apply for 1 to 2 seconds per hog. Repeat daily if needed. Do not ship for slaughter within 5 days of last treatment.

TO CONTROL **Blood Sucking Lice**, apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

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 partiv 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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