



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

March 7, 2005

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

Subject: Amendment - Revised Basic Formulation and labeling changes
TetraPerm Industrial Crawling Insect Killer N104
EPA Reg. No. 73049-338
Your Letter Dated August 17, 2004

Dear Dr. Sharp:

We have no objection to the use of the revised basic formulation requested in your letter of the above date. The basic confidential statement of formula (dated 08/17/04) is acceptable and will supercede the previously accepted basic formulation (dated 11/01/91) and has been inserted in the file for the subject product.

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. Please make the following label changes.
 - a. Replace "This product is toxic to fish" with "This product is toxic to fish and other aquatic organisms" in *Environmental Hazards* statement.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander for". The signature is written in black ink and is positioned above the typed name and title.

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

TETRAPERM[®]

INDUSTRIAL CRAWLING INSECT KILLER N104

- For Commercial/Industrial Use
- Controls Industrial and Garden Insects
- For Commercial Use in Non-Food/Feed Areas of Industrial and Institutional Buildings: School, Warehouses, Office Buildings, Theaters, Garages, Hotels, Motels
- ABroad Spectrum Insecticide Highly Effective Against Ants, Beetles (Including Carpet Beetles, Flour Beetles, Grain Beetles, and Ground Beetles), Centipedes, Clover Mites, Cockroaches, Crickets (Including Mole Crickets), Earwigs, Firebrats, Fleas, Millipedes, Moths, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders, Ticks, Wasps, and Many Similar Pests
- Water-Based Formula
- Non-Staining

ACTIVE INGREDIENTS:

Tetramethrin	0.20 %
Permethrin*	0.20 %
Piperonyl Butoxide**	1.00 %
OTHER INGREDIENTS†:	98.60 %
	100.00 %

**ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 7 2005**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
73049-338

* Cis/trans ratio: max. 55% (+/-) cis and min. 45% (+/-) trans.

** Equivalent to min. 0.80% (butylcarbityl)(6-propylpiperonyl) ether and 0.20% related compounds.

†Contains petroleum distillate

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
(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. 73049-338

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
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.
If Inhaled:	<ul style="list-style-type: none"> • Remove person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further 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 <i>Medical</i> 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.	
NOTE TO PHYSICIAN	
Contains petroleum distillate - vomiting may cause aspiration pneumonia.	

SEE REAR PANEL FOR USE CAUTIONS

NET CONTENTS:

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

CAUTION

Harmful if swallowed, absorbed through skin or inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling and before smoking or eating. Remove contaminated clothing and wash before reuse.

Environmental Hazards

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

Physical Or 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 use this product in conduits, motor housings, junction and switch boxes or other electrical equipment because of possible shock hazard.

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 space spraying or surface applications. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry. Do not apply in classrooms when in use. 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, etc.) in the immediate area when occupants are present.

Do not use in food/feed areas of food 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.

Non-food/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).

Test product on an inconspicuous area before applying. Spray until surface is slightly wet but not to the point of run-off. Over application may cause damage. Will not stain surfaces or fabrics where water alone causes no damage.

SHAKE WELL BEFORE USING

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

INDOORS:

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/feed product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1000 cubic feet of space. 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.

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

TO CONTROL Fleas and Brown Dog Ticks: Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames and localized areas of floor and floor coverings. Place fresh bedding in animal quarters following treatment. Do not spray pets with this product. Treat pets with a product registered for application to pets to control the source of flea infestation. Also, treat your yard with a product registered for yard application.

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.

PESTS ON OUTSIDE SURFACE OF BUILDINGS: For control of building infestation due to *Ants, Clover Mites, Crickets, Earwigs, Millipedes* and *Sowbugs (Pillbugs)*, spray foundation of building where insects are active and may find entrance, up to a height of 2 to 3 feet. Apply as a

residual spray to outside surfaces of buildings where insects tend to congregate. Spray areas include (but are not limited to) screens, window frames, eaves, porches, patios, garages and refuse dumps.

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.

Ants, Lone Star Ticks, Dog Ticks, Crickets, Fleas and Earwigs: Apply thoroughly to infestation in bushes, grass or weeds. For *Ants*, spray freely around ant trails and hills.

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*.

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, Spider and Red Mites, Exposed Thrips, Luce 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. Over application may cause damage. Contact insects directly whenever possible. Repeat treatment as infestations occur.

STORAGE AND DISPOSAL

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

Storage: Do not store near heat or open flame. Store in a cool, dry area away from children.. [Store in a cool, dry area away from [inaccessible to] children and pets and away from heat, sparks and open flame.] [Protect from freezing.] [Do not freeze.] [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. [This container may be recycled in aerosol recycling centers. At present, there are only a few such centers in the country. Before offering for recycling, empty the can by using the product according to the label.] *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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