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

OFFICE OF PREVENTION PESTICIDES AND TOXIC SUBSTANCES

OCT 2 5 2004

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

Subject:

Label Amendment - Response to Agency's August 20, 2003 letter

PyraPerm Industrial Insect Killer WBA P61

EPA Reg. No. 73049-323

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. Under Environmental Hazards revise the first sentence to read "This pesticide is toxic to fish and other aquatic organisms."
- 2. The inhalation study submitted to revise the current tox category (category III) is acceptable and meets the criteria for toxicity category IV. The label may be revised as follows:
 - a. Based on the acute inhalation category IV, delete the inhalation precautionary statements.
 - Since all routes of exposure for this product meet criteria of toxicity category IV a signal word is not required. Likewise the Hazards to Humans & Domestic Animals paragraph is not required and may be deleted.

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

Sincerely,

Di Oranda Alwander Jor George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)



ACCEPTED with COMMENTS OCT 2 5 2004

Under the Federal insecticide, Fungicide, and Rodenticide Act. as amended, for the pe registered under EPA

PYRAPERM®

INDUSTRIAL INSECT KILLER WBA P61

- CAN BE USED IN NON-FOOD/FEED AREAS OF FOOD/FEED PROCESSING PLANTS AND OFFICIAL ESTABLISHMENTS OPERATING UNDER THE MEAT, POULTRY, SHELL EGG GRAD-ING AND EGG PRODUCTS INSPECTION PROGRAMS.
- CONTAINS PYRENONE® AND PERMANONE®
- SEEKS OUT BUGS WHERE THEY HIDE
- KILLS ON CONTACT
- CONTROLS INDUSTRIAL INSECTS
- FOR COMMERCIAL/AGRICULTURAL USE
- A BROAD SPECTRUM INSECTICIDE EFFECTIVE AGAINST ANTS, (INCLUDING CARPENTER ANTS), BEES, BEETLES (INCLUDING CARPET, FLOUR, GRAIN AND GROUND BEE-TLES), CENTIPEDES, CLOVER MITES, COCKROACHES, CRICKETS, (INCLUDING MOLE CRICKETS), EARWIGS, FIRE-BRATS, FLEAS, MILLIPEDES, MOTHS, PILLBUGS, SCORPI-ONS, SILVERFISH, SOWBUGS, SPIDERS, TICKS (INCLUDING TICKS WHICH MAY CAUSE LYME DISEASE), WASPS, AND OTHER PESTS LISTED ON THE LABEL
- KILLS LICE AND THEIR EGGS
- FOR USE ON BEDDING. FURNITURE AND OTHER INANIMATE **OBJECTS INFESTED WITH LICE**
- **NON-STAINING**
- WATER-BASED FORMULA
- FOR USE ON PREMISES TO CONTROL FLEAS AND TICKS
- PROTECTS FOR UP TO 4 WEEKS
- PROTECTS FOR UP TO 12 WEEKS
- PROTECTS FOR UP TO 3 MONTHS

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. Ĵ				0.20%
	A S			1.00%
<i>A</i> .				0.40%
				98.40%
			1	00.00%

^{*}Equivalent to min. 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% 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. 73049-347

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN CAUTION

SEE REAR PANEL FOR CAUTIONS

NET CONTENTS:

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

Harmful if inhaled. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Environmental Hazards

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

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 use on electrical equipment or 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.

Do not apply directly to food.

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.

Non-food 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).

Commercial Food/Feed areas where the product cannot be used include areas for receiving, serving, storage (dry, cold, frozen, raw), packaging (cleaning, slicing, cooking, grinding), edible, waste storage, enclosed processing systems (mills, dairies, edible oils, syrups).

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use. Do not apply to institutions (including libraries, sports facilities, etc.) in the immediate area when occupants are present.

SHAKE WELL BEFORE USING

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

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

INDOORS:

Cluster Flies, 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 area closed for 15 minutes after spraying. Ventilate room thoroughly before reentry. Sweep up and discard fallen insects.

Cockroaches, Waterbugs, Palmetto Bugs, Silverfish, Firebrats, Crickets, Scorpions, Spiders, Millipedes, Centipedes, Sowbugs and Pilibugs: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray when ever 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, 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 base-boards, 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.

Fleas IN BUILDINGS - SPACE 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.

Fleas & Ticks, Including Ticks Which May Cause Lyme Disease (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 and mattresses may also be treated with this product.

TO KILL *Lice and Louse Eggs:* Spray entire area to be treated. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square foot for three seconds. Spray only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all sprayed articles to dry thoroughly before use.

IN ANIMAL QUARTERS AND MILK ROOMS: For rapid control of *Houseflies, Mosquitoes, Gnats, Wasps, Hornets, Bees* and *Small Flying Moths*, close windows and doors and spray at the rate of 2 seconds per 1000 cubic feet of space. For best results, keep area closed for 10 minutes after spraying. Do not remain in treated area and ventilate after treatment is completed.

TO TREAT LIVESTOCK: To protect beef cattle, dairy cattle, goats, sheep, hogs and horses from attacks of **Stable Files**, **Horse Files**, **Deer Files**, **Face Files**, **Housefiles**, **Horn Files**, **Mosquitoes** and **Gnats**: Spray about 3 seconds on each side being careful to spray back, withers and forelegs thoroughly. To protect from **Face Files**, spray the face and head, but do not spray into eyes.

FOR SWINE: Do not ship animals 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.

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** !N POULTRY HOUS-ES, spray crevices of roost poles, cracks in walls, and cracks in nests where the **bedbugs** and **mites** hide.

OUTDOORS:

Point spray nozzle away from face. Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment or before use. Do not use on edible crops. 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.

FLYING INSECTS: *Files, 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.

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. Apply in late evening when insects

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are at rest. Spray into hiding and breeding places contacting as may insects as possible.

CRAWLING INSECTS: Ants, Cockroaches, including Asian Cockroaches, Crickets, Mole Crickets, Centipedes and Silverfish. Hold can two (2) to three (3) feet from surface to be treated and spray 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.

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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