

74785-2

02/27/2007

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FEB 27 2007

Mr. Charles Ma  
Bio- Planet Products, LLC  
4943- A Waa Street  
Honolulu, Hawaii 96821

Dear Mr. Ma:

Subject: Label Amendment- add pest  
Bio-Planet Products Ant & Roach Protection  
EPA Registration Number 74785-2  
Your submission dated August 17, 2006

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Replace "Use Responsible" with "Caution" as we indicated in the Registration Notice this statement is in conflict with the misuse statement on the second page and is superficial in context.

2. Under "To Control Bedbugs" change "Cover with mattress cover after treatment." to "Cover mattresses with mattress cover or sheets before use."

3. Delete "Indoor" from the heading beginning "Pests on the Indoor/Outdoor surface of Buildings". It should read "Pests on the Outdoor surface of Buildings". Also move this heading plus the paragraph beginning "Ready to Use (not a space spray), use clean sprayer... etc" under Outdoor Application section.

4. Make the following revisions to the warranty statement.  
a. Change "should" to "must" under Conditions.  
b. Add the phrase "to the extent consistent with applicable law" to the beginning of the sentence "Bio-Plant Products LLC makes no warranties... etc, and "The exclusive remedy of the user or buyer... etc."

You may delete the instructions "Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container from the instructions under Outdoor Application. These statements pertain to indoor use instructions only.

A copy of a stamped label is enclosed for your records.

Sincerely yours,

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

Enclosure

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ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 27 2007

Judge of Federal Insecticide,  
Fungicide and Fertilizer Act  
is provided for the pesticide  
registration under EPA Reg. No.  
74785-2

# Bio-Planet Products

## Ant & Roach Protection Flea and Tick Spray

- *[FOR DOMESTIC USE BOTH INDOORS AND OUTDOORS.*
- *FOR LIVESTOCK AND PREMISE USE*
- *READY-TO-USE FOR CONTROL OF HOUSEHOLD PESTS*
- *DILUTE FOR USE ON VEGETABLES AND FRUIT AND NUT TREES*
- *FOR CONTROL OF FLEAS, BROWN DOG TICKS AND LICE ON PREMISES AND ON DOGS*
- *CONTROLS FLEAS AND TICKS ON DOGS FOR 14 DAYS*
- *FOR CONTROL OF PESTS ON LIVESTOCK*
- *PROVIDES 60-DAY (TWO MONTHS) CONTROL OF COCKROACHES*
- *PROVIDES 60-DAY (TWO MONTHS) CONTROL OF FLEAS*
- *PROVIDES 60-DAY (TWO MONTHS) CONTROL OF STORED PRODUCT PESTS*
- *FOR HOUSEHOLD AND DOMESTIC USE ONLY*
  - *READY TO USE*
  - *WATER-BASED*
  - *ORNAMENTAL AND HEDGE TREATMENT*
  - *OUTDOOR PEST CONTROL PRODUCT*
  - *CONTROLS NUMEROUS NAMED PESTS OF ORNAMENTAL PLANTS*
  - *CONTROL OF TICKS*
  - *CONTAINS PERMANONE*
  - *KILLS ON CONTACT*
  - *FOR CONTROL OF ANTS*
  - *FOR CONTROL OF GYPSY MOTHS*
  - *KILLS FLEAS AND TICKS]*

**ACTIVE INGREDIENT:**

Permethrin <sup>1</sup> .....	0.25 %
<b>OTHER INGREDIENTS:</b> .....	99.75 %
	<u>100.00 %</u>

<sup>1</sup> cis trans ratio max 35% (+-) cis and min 65% (+-) trans

**PRECAUCION AL CONSUMIDOR** 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. 74785-2

EPA EST. NO. 74785-HI

**KEEP OUT OF REACH OF CHILDREN**

**USE RESPONSIBLY**  
(Read Back Panel)

**NET CONTENTS:**

**READ ENTIRE LABEL BEFORE EACH USE****PET USE APPLIES TO USE ONLY ON DOGS**

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**

Wash thoroughly after handling and before smoking or eating. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before surface applications. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry.

Do not use on dogs under twelve (12) weeks old. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**Environmental Hazards**

This product is extremely toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

**DIRECTIONS FOR USE**

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production or for research purposes.

**SHAKE WELL BEFORE USING**

Do not use on electrical equipment or on surfaces that can be harmed or stained by water.

**INDOOR APPLICATION**

**HOUSEHOLD PESTS** For spot application only. Do not use as a space spray indoors.

Ready to use. Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container.

**SURFACE SPRAYING, FOR UP TO 60-DAY (TWO MONTHS) CONTROL OF:** *Cockroaches, Waterbugs, Palmetto Bugs, Scorpions, Millipedes, Centipedes, Sowbugs, Pillbugs, Ants, Silverfish, Firebrats, Spiders, Crickets, Clover Mites, Cheese Mites, Granary Weevils, Rice Weevils, Confused Flour Beetles, Rust Red Flour Beetles, Drugstore Beetles, Meal Worms, Grain Mites and Cadelles.* Direct the spray into hiding places, cracks and crevices, and behind shelves and drawers. For *Silverfish*, spray bookcases. For *Ants*, spray trails, nests and points of entry.

**TO CONTROL *Carpet Beetles*:** Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving.

**TO CONTROL *Bedbugs*:** Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Cover with mattress cover after treatment.

**TO CONTROL *Fleas (Adults and Larvae) and Ticks (Adults and Larvae)*:** Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames, and entire areas of floor and

floor covering. Place fresh bedding in animal quarters following treatment. Allow to dry thoroughly before allowing pets to contact treated areas.

TO CONTROL *Clothes Moths*. Remove any 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 lightly, keeping nozzle at least three feet from fabric to avoid staining.

TO KILL *Lice and Louse Eggs*: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Spray from a distance of 8 to 10 inches. Treat only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all treated particles to dry thoroughly before use.

#### LIVESTOCK PESTS

Ready to use. Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container. Do not contaminate animal feed or water during application.

ON LIVESTOCK: To protect cattle (beef and dairy), goats, sheep, hogs and horses from *Horn Flies, Face Flies, Houseflies, Mosquitoes* and *Gnats*: Apply a light mist sufficient to wet the surface of the hair. For face flies, spray face and head, but do not spray into eyes.

TO CONTROL *Stable Flies, Horse Flies and Deer Flies*: Apply at a rate of 2 ounces per adult animal, sufficient to wet the hair thoroughly. Repeat treatment daily or at intervals necessary to give continued protection.

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.

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.

TO CONTROL *Bedbugs and Mites* IN POULTRY HOUSES: Spray crevices of roost poles, cracks in walls, and cracks in nests where the bedbugs and mites hide.

ON DOGS; TO CONTROL *Fleas, Ticks, and Lice*: Ready to use. Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container. Start spraying at the tail, moving the dispenser rapidly and making sure that the animal's entire body is covered, including the legs and underbody. While spraying, fluff the hair so that the spray will penetrate to the skin. Make sure spray wets thoroughly, but do not saturate animal. Do not spray into eyes or face. Avoid contact with genitalia. Repeat application every two weeks if necessary. DO NOT USE ON CATS OR KITTENS.

PESTS ON THE INDOOR/OUTDOOR SURFACE OF BUILDINGS: To temporarily control *Houseflies, Mosquitoes, Cluster Flies, Gnats* and *Flying Moths*. For outdoor use only as an aid in reducing annoyance from these insects.

Ready to use. (NOT A SPACE SPRAY) Use clean sprayer. Spray pests on outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages and other places where these insects alight or congregate. Flush sprayer with clean water after each use.

#### OUTDOOR APPLICATION

TO HELP CONTROL *Ticks* IN OUTDOOR ACTIVITY AREAS: Ready to use. Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container. Treat a band of vegetation and leaf litter 6-10 feet wide and adjacent to activity areas, especially where dense vegetation occurs.

#### ORNAMENTAL FLOWER GARDENS

Ready to use. Affix trigger, pump or other type of sprayer to container for application. Do not transfer to another container.

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 a multipurpose 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, dogwoods, English ivy, eunonymus, fuschia, geraniums, crassula, grape vines, Kentia palms, laurels, 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, Lace Bugs, Japanese Beetles, Pavement Ants, Clover Mites* and *Armyworms*.

When spraying plants, do not operate closer than 18 inches. Use sweeping motion. 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. Repeat treatment as infestations occur.

ORNAMENTAL TREES AROUND THE HOME: Ready to use. Use clean sprayer. Use sufficient spray to obtain full coverage of all foliage. Avoid heavy wetting. Use to control: *Pine Moths, Pine Needle Miners, Pine Beetles* and *Needle Scales* on pine: *Budworms*

on conifers; *Oakworms* on oak; *Fall Webworms* on cherry, elm and honeysuckle. *Aphids* on tulip poplar; *Citrus black flies* on non-bearing citrus; *Tussock Moths* on Douglas and grand firs; *Leafminers* on birch, *Elm Leaf Beetles* and *Elm Spanworms* on elms. Flush sprayer with clean water after each use.

FOR HOME VEGETABLE GARDENS: Dilute before using. Use clean sprayer. Carefully measure and mix 1 fluid ounce of PERMANONE and 12 fluid ounces of water. Spray upper and lower leaf surface as directed. Use sufficient spray to obtain full coverage of all foliage, but do not spray to the point of runoff. Apply no more than 13 ounces of dilute mixture over 100 linear feet of row (13 ounces of diluted mixture per 100 square feet.) Flush sprayer with clean water after each use.

VEGETABLE	TARGET PESTS	REMARKS
Asparagus (pre-harvest)	Cutworms asparagus beetle	Spray plants as needed to ensure uniform coverage. Do not make more than 4 applications. Can be applied up to 3 days prior to harvest.
Asparagus (post-harvest)	Larval stages of asparagus beetle, tarnished plant bugs, lygus bugs and adult Japanese beetles.	Treat fern or bush growth after spear harvest when insects are present.
Celery - see leafy vegetables		
Cole Crops Broccoli, Brussels Sprouts, Cabbage, Cauliflower	Beet armyworm, diamond back moth, imported cabbage-worm, cabbage aphid, cabbage looper	Apply every 5 days or as needed. Can be applied up to one day prior to harvest. Do not make more than 10 applications on cabbage and 8 applications on the other cole crops.
Corn - see sweet corn		
Cucurbits Balsam pear (bitter melon), Chinese waxgourd (Chinese melon), Citrus melon, cucumber, Gherkin, Edible gourds, Melons including hybrids such as cantaloupe, casaba, crenshaw, honeydew, honey balls, mango melon, muskmelon, and Persian melon, pumpkin, summer & winter squash, watermelon	Aphids, cabbage loopers, cucumber beetles (adults), cutworms, leafhoppers, leafminers, melonworms, pickleworms, plant bugs and squash bugs	Spray plants as needed to ensure uniform coverage. Do not make more than 8 applications per crop. Can be applied up to the day of harvest.
Eggplant	Colorado potato beetles, vegetable leaf miners	Spray plants as needed to ensure uniform coverage. Do not make more than 16 applications. Can be applied up to 3 days prior to harvest.
Horseradish	Imported crucifer weevils	Spray as needed. Do not make more than 3 foliar applications. Can be applied up to 22 days prior to harvest.
Leafy Vegetables. amaranth, arugula, celery, celtuce, chervil, corn salad, chrysanthemum (edible-leaved and	Alfalfa loopers, aphids, beet armyworms, cabbage loopers, corn earworms, cutworms, European corn borers,	Spray every 5 to 10 days as needed. Do not make more than 7 applications per crop. Can be applied up to 1 day prior to harvest.

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	plum curculio, plant bugs, green fruit worms, Oriental fruit moths	within 7 days of har- vest Do not make more than 8 applica- tions per season
Pears	pear psylla, green fruitworms and codling moths.	Apply when needed Do not apply more than 3 applications per season Can be applied up to 14 days prior to harvest

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal  
**Storage:** Store in original container in a cool, dry area away from children and pets.  
**Container Disposal: If empty:** Do not reuse this container 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. Never place unused product down any indoor or outdoor drain.

**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.  
**DISCLAIMER OF WARRANTIES:** Bio-Planet Products LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL No agent of Bio-Planet Products LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. Bio-Planet Products LLC disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.  
**LIMITATIONS OF LIABILITY:** 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 VALENT BIOSCIENCES CORPORATION'S ELECTION, THE REPLACEMENT OF PRODUCT.

Bio-Planet Products LLC, 2002

Bio-Planet Products LLC  
4943-A Waa St.  
Honolulu, Hawaii 96821  
0267/R1