

89015-1

12/17/2012

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U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division (H7505C)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

EPA Reg. Number:  
89015-1

Date of Issuance:  
DEC 17 2012

Term of Issuance:  
Unconditional

Name of Pesticide Product:

Synergy

NOTICE OF PESTICIDE:

- Registration
- Reregistration

(Under FIFRA as amended)

Name and Address of Registrant (include ZIP Code):

NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, Oregon 97504

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is **unconditionally** registered in accordance with FIFRA sec. 3(c)(5). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3).

1. You will make the following label changes before you release the product for shipment:

- a) Revise the EPA Registration Number to read "EPA Reg. No. 89015-1."
- b) Revise *Precautionary Statements* to read as follows:

"CAUTION. Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse."

- c) Add "If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person." To the *First Aid* statement.

Signature of Approving Official:

*Richard Gebken*  
Richard Gebken Product Manager  
Insecticide Branch/Registration Division (7505P)

Date:

*December 17, 2012*

Enclosure

d) Revise the *Environmental Hazards* statement to read as follows:

“This product is toxic to aquatic organisms including fish and invertebrates. To protect the environment do not allow pesticide to enter or run off into storm drains drainage ditches gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid runoff to water bodies or drainage systems. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.”

e) On the front panel and on page 2 replace the statement “For use in home gardens, indoor houseplants, greenhouses, and other residential landscapes” with “For use in home gardens, indoor houseplants, greenhouses.”

f) On page 2 either delete the statement “Repeat treatment as needed” and “May be used on edible crops up to and including day of harvest”.

g) Add the following use restrictions under the *Use Restrictions* section:

- Do not apply within 21 days of a sulfur application
- Do not apply more than 10 times per season
- Not for use in outdoors residential misting systems

h) Delete the following from the *Outdoor Use* and *Home Greenhouse Use* sections, no data has been cited or submitted to support these uses:

- Sugar beets
- Soybeans
- Asparagus
- Beets
- Cauliflower
- Celery
- Collards
- Eggplant
- Kale
- Mustard greens
- Peppers
- Radishes
- Spinach
- Squash
- Olives
- Blueberry
- Cranberry

i) Under the heading *Indoor Use* delete all uses except houseplants.

j) Replace the statement "Kills exposed egg stages of pests present in dormant season ... etc" with "Kills exposed egg stages of listed pests present in dormant season ... etc" in the *Dormant Use* section.

k) Revise or delete the following optional marketing claims:

- Correct the misspelling of "payllids" i.e. "psyllids".
- Replace "Contact insecticide, ovicide" with "Kills by contact insecticide, ovicide"
- Replace "Synergy is a contact killer for listed insect pests" with "Synergy kills listed insect pests by contact"
- Replace "Contact insecticide" with "Kills by contact"
- Replace "Kills listed insects on contact" with "Kills listed insects by contact"
- Replace "Kills listed bugs on contact" with "Kills listed bugs by contact"
- Delete "[May][Can]be used up to and including day of harvest"
- Delete "This container is made with a minimum X% recycled material"

2. Submit a label showing all pictograms of labeled target pests and use sites for approval before placing on the label.

3. Please note that, should you wish to add a reference to the company's website on your label, the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

4. Per 40 CFR 156.10(a)(6), submit one copy of your final printed labeling before releasing the product for shipment. As defined in 40 CFR 152.3, "final printed labeling" means the "label or labeling of the product when distributed or sold". Clearly legible reproductions or photo reductions will be accepted for unusual labels. Note that a clean copy of the master label in most cases does not meet the definition of final printed labeling. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at [www.alexander.bewanda@epa.gov](mailto:www.alexander.bewanda@epa.gov) or (703) 305-7460.

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(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**(MASTER LABEL)**

**Synergy**

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**  
**DEC 17 2012**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
89015-1

(Alternate Brand Names: Synergy – Flower, Fruit & Vegetable Insect Killer; Synergy Spider Mite Killer; Spider Mite Killer)

For use in home gardens, indoor houseplants, greenhouses, and other residential landscapes.

**Active Ingredients**

Pyrethrins.....	0.006%
Canola Oil.....	1.350%
<b>Other Ingredients.....</b>	<b>98.644%</b>
<b>Total</b>	<b>100.000%</b>

This product contains 0.1112 lbs. of canola oil and 0.00048 lbs. of pyrethrins per gallon.

**CAUTION**

**KEEP OUT OF REACH OF CHILDREN**

FIRST AID	
<b>IF ON SKIN OR CLOTHING:</b>	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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific Time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

See [back] [other] [side] [panel] for additional precautionary statements.

Manufactured for:  
NPK LLC  
1600 Skypark Drive, Suite 215  
Medford, OR 97504

EPA Reg. No. 89015-X  
EPA Est. No. \_\_\_\_\_

Net Contents:

Batch No. (Note to reviewer: the lot or batch number may also be stamped directly on the product container.)

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(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

## PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals:** CAUTION: Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### User Safety Recommendations

- Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside, then wash thoroughly and put on clean clothing.

### Environmental Hazards

This product is toxic to aquatic organisms including fish and invertebrates. Do not apply directly to or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements.

## DIRECTIONS FOR USE

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

For use in home gardens, on home indoor houseplants, home greenhouses, and other residential landscapes. Read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip. Repeat treatment as needed. May be used on edible crops up to and including day of harvest.

## USE RESTRICTIONS

- Do not allow adults, children, or pets to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not use Synergy spray when temperatures are above 90°F.
- Do not apply more than 1 time per day.
- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water treated area(s) or apply prior to heavy rainfall.

**Phytotoxicity:** Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar,

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and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

### PESTS/SITES AND APPLICATION INSTRUCTIONS

[Synergy will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle, flea beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites]; [spittlebugs], [springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

### OUTDOOR USE

For use outdoors on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [sugar beets]; [soybeans]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, asparagus, beets, cauliflower, celery, collards, eggplant, lettuce, lima beans, kale, mustard greens, peppers, radishes, spinach, squash)]; [figs]; [olives]; [small fruits (grapes, strawberry, raspberry, blueberry, cranberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 2.5 gal. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

### HOME GREENHOUSE USE

For use in home greenhouses on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [sugar beets]; [soybeans]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, asparagus, beets, cauliflower, celery, collards, eggplant, lettuce, lima beans, kale, mustard greens, peppers, radishes, spinach, squash)]; [figs]; [olives]; [small fruits (grapes, strawberry, raspberry, blueberry, cranberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 32 oz. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

### INDOOR USE

For use indoors on houseplants and on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [sugar beets]; [soybeans]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, asparagus, beets, cauliflower, celery, collards, eggplant, lettuce, lima beans, kale, mustard greens, peppers, radishes, spinach, squash)]; [figs]; [olives]; [small fruits

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(grapes, strawberry, raspberry, blueberry, cranberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)].

**DORMANT USE**

Kills exposed egg stages of pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees.

**STORAGE AND DISPOSAL**

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

(Note to reviewer: The following statements for residential use containers ≤5 gal.)

**STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

(Note to reviewer: The following statements for containers >5 gal. This product is non-dilutable.)

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

[Notice to Buyer: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with label directions.]



(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

**Optional Marketing claims and product information**  
(May be presented on the container or supplemental labeling)

- For Homeowner use
- Fast acting
- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Kills Japanese Beetles
- Kills all accessible stages of listed [crawling] [and] [flying] insects [including eggs].
- Kills all accessible stages of listed insects [including eggs].
- Kills all accessible stages of spider mites [including eggs].
- Contact insecticide, ovicide.
- Kills spider mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For roses, flowers, and vegetables
- Contains pyrethrins and canola oil
- For use on plants – indoors and outdoors
- Can use on [flowers], [vegetables], [fruits], and [roses]
- Easy to use
- Insecticide/Miticide
- Insect spray
- [Use on] Roses and flowers
- [Use on] Houseplants and gardens
- [Use on] Fruits and vegetables
- Synergy is a contact killer for listed insect pests.
- Contact insecticide
- For best results, pests must be contacted directly with spray
- Kills listed insects on contact
- Kills listed bugs on contact
- Read entire container label before using this product
- [May] [Can] be used up to and including day of harvest
- Questions, Comments Call XXX-XXX-XXXX
- Made in USA
- This container is made with a minimum X% recycled material
- (Insert company website)
- Some floors may be slippery after spraying
- (Pictograms of labeled target pests and use sites)