

89015-1

2/27/2013

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 27, 2013

Micah T. Reynolds  
Agent for NPK LLC  
Technology Sciences Group Inc  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20036

Subject: Amendment – Response to Agency’s December 17, 2012 letter  
Synergy  
EPA Reg. No. 89015-1  
Your submission dated February 1, 2013

Dear Mr. Reynolds:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 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. Add “Harmful if swallowed” to the Precautionary Statements.
2. On page 2 delete the statement “May be used on edible crops up to and including day of harvest” from the Directions for Use.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely,  
*BeWanda Alexander for*  
Richard Gebken  
Product Manager  
Insecticide Branch  
Registration Division (7505P)

Enclosure

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

(MASTER LABEL)

Synergy

ACCEPTED with COMMENTS In EPA Letter Dated FEB 27 2013 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, and greenhouses.

Active Ingredients

Table with 2 columns: Ingredient Name and Percentage. Rows include Pyrethrins (0.0075%), Canola Oil (1.3500%), Other Ingredients (98.6425%), and Total (100.0000%).

This product contains 0.1112 lbs. of canola oil and 0.0006 lbs. of pyrethrins per gallon.

CAUTION KEEP OUT OF REACH OF CHILDREN

Table with 2 columns: Condition and First Aid instructions. Rows include 'IF SWALLOWED', 'IF ON SKIN OR CLOTHING:', and general instructions for calling poison control.

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

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

EPA Reg. No. 89015-1 EPA Est. No. \_\_\_\_\_

Net Contents:

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

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

### PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals:** CAUTION: Harmful if absorbed through skin. 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. 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. 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.

#### 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, indoor houseplants, and greenhouses. 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. 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 within 21 days of a sulfur application.
- Do not apply more than 10 times per season.
- Not for use in outdoor residential misting systems.

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

- 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, 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]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [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]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [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.

**DORMANT USE**

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

Kills exposed egg stages of listed 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, pictograms, 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].
- Kills by 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 kills listed [insect] pests by contact.
- Kills by contact
- For best results, pests must be contacted directly with spray
- Kills listed insects by contact
- Kills listed bugs by contact
- Read entire container label before using this product
- Questions, Comments Call XXX-XXX-XXXX
- Made in USA
- (Insert company website)
- Some floors may be slippery after spraying