



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 10, 2016

Mr. Micah T. Reynolds, Agent
Oregon Global Distribution, Inc. (d/b/a NPK Industries)
c/o Technology Sciences Group, Inc.
1150 18th Street NW, Suite 1000
Washington, DC 20036

Subject: Label Amendment – Correcting First Aid Section, Updating Environmental Hazards Statement, Adding Alternate Brand Name, and Adding Optional Marketing Claims
Product Name: Synergy
EPA Registration Number: 89819-1
Application Date: February 18, 2016
Decision Number: 514807

Dear Mr. Reynolds:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act 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 FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list 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 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 the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Linda A. DeLuise by phone at 703-305-5428, or via email at deluise.linda@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Walsh', written in a cursive style.

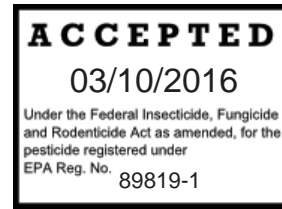
Michael Walsh
Product Manager 11
Invertebrate & Vertebrate Branch 2
Registration Division
Office of Pesticide Programs

Enclosure

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

(MASTER LABEL)

Synergy



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

For use in home gardens, indoor houseplants, and greenhouses.

Active Ingredients

Pyrethrins.....	0.0075%
Canola Oil.....	1.3500%
Other Ingredients.....	98.6425%
Total	100.0000%

[This product contains 0.1112 lbs. of canola oil and 0.0006 lbs. of pyrethrins per gallon.]
[This product contains 0.45 oz. of canola oil and 0.0024 oz. of pyrethrins per quart.]

CAUTION KEEP OUT OF REACH OF CHILDREN

FIRST AID	
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.
IF ON SKIN OR CLOTHING:	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 emergency information on this product (including health concerns, medical emergencies or pesticide incidents), call the poison control center 1-800-222-1222.	

See [back] [other] [side] [panel] [and fold out label] for additional precautionary statements [and directions for use].

(Note to Reviewer: label presentation for some retail packaging may be accordion or peel-back style.)

Manufactured for:
NPK Industries
1600 Skypark Drive, Suite 212
Medford, OR 97504

EPA Reg. No. 89819-1
EPA Est. No. _____

Net Contents:

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: 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. 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 foraging in 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.

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.

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

DORMANT USE

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 other procedures approved by state and local authorities.

[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
- [May be Used on] [Use on] Roses and flowers
- [May be Used on] [Use on] Houseplants and gardens
- [May be Used on] [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 [the] USA
- Some floors may be slippery after spraying
- Ready to Use
- Do Not Dilute
- Shake Well
- NPK Industries presents *(Note to reviewer: This optional marketing statement intended for use as a callout on the label front panel to serve to “debut” the product in the marketplace)*

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

