



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 8, 2019

Nicole O'Loughlin  
Regulatory Consultant for Atticus, LLC  
Pyxis Regulatory Consulting Inc.  
4110 136<sup>th</sup> Street Ct. NW  
Gig Harbor, WA 98332

Subject: Registration Review Label Mitigation for Chlorfenapyr  
Product Name: T103.01  
EPA Registration Number: 91234-24  
Application Dates: August 16, 2017  
Decision Numbers: 533029

Dear Ms. Nicole O'Loughlin:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Chlorfenapyr Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label 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.

Page 2 of 2  
EPA Reg. No. 91234-24  
Decision No. 533029

If you have any questions about this letter, please contact Darius Stanton by phone at 703-347-0433, or via email at [Stanton.Darius@EPA.gov](mailto:Stanton.Darius@EPA.gov).

Sincerely,

A handwritten signature in blue ink, appearing to be 'Linda Arrington', with a stylized flourish at the end.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

# {BOOKLET FRONT PANEL LANGUAGE}

## T103.01

[Alternate Brand Name: Spectre Liquid Insecticide]  
Insecticide

**For sale to, use and storage only by individuals/firms licensed or registered by the state to apply termiticide and/or general pest control products.**

| <b>Active Ingredient:</b>      | <b>By Wt.</b> |
|--------------------------------|---------------|
| *Chlorfenapyr: .....           | 21.45%        |
| <b>Other Ingredients</b> ..... | 78.55%        |
| <b>Total</b> .....             | 100.00%       |

\*4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile.  
T103.01 contains 2.0 pounds of active ingredient per gallon

Contains chlorfenapyr, the active ingredient used in Phantom®.  
T103.01 it not manufactured or distributed by BASF Corporation, seller of Phantom®.

### KEEP OUT OF REACH OF CHILDREN CAUTION/PRECAUCION

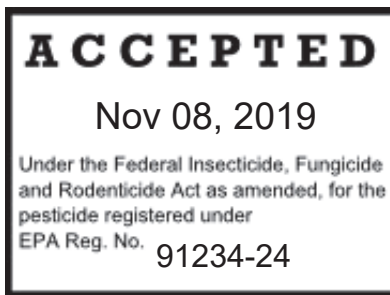
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside booklet for complete **First Aid, Precautionary Statements, Directions for Use, and Conditions of Sale and Warranty.**

**Manufactured For:**  
Atticus, LLC  
5000 CentreGreen Way, Suite 100  
Cary, NC 27513

**EPA Reg. No.: 91234-24**  
**EPA Est. No.:**

**Net Contents:**



## {LANGUAGE INSIDE BOOKLET}

| <b>FIRST AID</b>  |   |
|---|---|
| <b>IF SWALLOWED</b>   | <ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• <b>Do not</b> induce vomiting unless told to do so by the poison control center or doctor.</li><li>• <b>Do not</b> give anything by mouth to an unconscious person.</li></ul> |
| <b>IF ON SKIN OR CLOTHING</b>   | <ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>   |
| <b>IF INHALED</b>   | <ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>   |
| <b>IF IN EYES</b>   | <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>  |
| <b>HOT LINE NUMBERS</b>   |   |
| Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call SafetyCall: <b>1-844-685-9173</b> . For chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC: <b>1-800-424-9300</b> . |   |

**For Chemical Emergency  
Spill, Leak, Fire, Exposure, or Accident  
Call CHEMTREC Day or Night  
Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

**PRECAUTIONARY STATEMENTS  
Hazards to Humans and Domestic Animals  
CAUTION**

**Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse.**

**Personal Protective Equipment (PPE)**

**All pesticide handlers (mixers, loaders and applicators) must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as barrier laminate, butyl rubber or nitrile rubber  $\geq 14$  mils, neoprene  $\geq 14$  mils, polyvinyl chloride (PVC)  $\geq 14$  mils, or Viton  $\geq 14$  mils).
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**USER SAFETY RECOMMENDATIONS**

Users should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. Wash PPE before reusing.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic organisms, birds and wildlife. **Do not** apply directly to water or to areas where surface water is present or intertidal areas below the mean high water mark. **Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate.

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.

### PHYSICAL OR CHEMICAL HAZARDS

**Do not** apply this product around electrical equipment due to the possibility of shock hazard.

### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. This label must be in the possession of the user at the time of pesticide application. Read entire label before using this product.

### General Pest Control

**General Information:** T103.01 can be used inside residential structures (houses, apartments, etc.), meat, poultry & egg processing & packaging plants, the food/feed- and nonfood/feed-handling areas of food-handling establishments and commercial, institutional and warehousing establishments.

- Food-handling Establishments include places other than private residences where exposed food is held, processed, prepared or served. These include food service, manufacturing and processing establishments such as restaurants, cafeterias, supermarkets, mills, processing plants, bakeries, breweries, dairies, meat slaughtering and packing plants and canneries.
- Commercial, institutional and warehousing establishments include schools, groceries and supermarkets, restaurants and cafeterias, hotels and motels; hospitals and nursing homes, warehouses and industrial buildings, laboratories, zoos, pet shops, computer facilities, and sewers.

### Use Precautions and Restrictions:

#### Precautions:

- Individuals without proper personal protective equipment should not be in immediate vicinity during application.
- Use only in well ventilated conditions.
- In hospitals and nursing homes, remove patients before treating rooms. Allow treated areas to dry before returning patients to treated rooms.
- Remove pets and cover or remove pet food/water and fish bowls prior to application
- In zoos, remove animals and cover or remove animal food/water prior to application.

#### Restrictions:

- **Do not** make general surface or space applications such as for pantry pests in cupboards, cabinets or in containers
- This product is not registered for use as a termiticide.
- **Do not** contaminate food or food contact surfaces.
- **Do not** apply to heating and air conditioning vents or ducts.
- **Do not** contact treated areas until spray has dried.
- **Do not** apply to aircraft cabins.
- **Do not** allow for contact to treated areas until spray has dried. Allow treated surfaces to dry before placing items.
- **Do not** apply in patient rooms or classrooms while in use.

- **Do not** apply water-based sprays where electrical short circuits could occur.
- **Do not** make surface applications to mattresses. Mattress treatments must be confined to the seams, folds, and edges only. Remove linens and wash before reuse. Allow to dry before remaking bed.

**Mixing Instructions:** To mix 1 or 5 gallons of finished dilution of T103.01 at concentrations of 0.25% or 0.50%, follow the instructions below:

- For 1 gallon of finished dilution of T103.01 at 0.25% concentration\*, add 1.5 fl oz (44 ml).
- For 5 gallons of finished dilution of T103.01 at 0.25% concentration\*, add 7.5 fl oz (220 ml).
- For 1 gallon of finished dilution of T103.01 at 0.5% concentration\*, add 3.0 fl oz (88 ml).
- For 5 gallons finished dilution of T103.01 at 0.5% concentration\*, add 15.0 fl oz (440 ml).

\*Percentage weight of active ingredient to weight of spray solution.

Mixing T103.01 Finished Dilution:

1. Fill hand-pressurized or power-operated application equipment with ½ to ¾ of the required amount of water.
2. Measure the required amount of T103.01.
3. Add T103.01 to the sprayer and fill with the remainder of the water.
4. Close sprayer and agitate to insure proper suspension.
5. Re-agitate material in sprayer before continuing if application is interrupted.

**Pests Controlled:** Use T103.01 to control many nuisance pests, stored product pests and occasional pests that infest structures, including:

- a. Ants (acrobat, Argentine, carpenter, odorous house, pavement, pharaoh's, and pyramid).
- b. Beetles (Asian lady, confused flour, darkling larva [yellow mealworms], saw-toothed grain), bed bugs, box-elder bugs, cockroaches (American, Asian, brown-banded, German, Oriental, smoky brown), European earwigs, house crickets, house flies, paper wasps\*, and silverfish (\* T103.01 is not a knockdown agent).
- c. Non-insect pests such as bark scorpions, centipedes, pill-bugs and spiders (black widow and cellar).

**Application Instructions:** Apply T103.01 as a spot or crack/crevice treatment where pests are found or can infest (i.e. nesting sites, hiding places, runways or breeding areas). Apply to surfaces beneath cabinets, spaces between equipment or expansion joints, surfaces behind sinks, lockers, water pipes, cabinets, or other pest hiding areas. Where possible, apply T103.01 directly to ant nests or nesting sites, ant trails or ant-infested wood or structural voids. Foam applications of T103.01 may be made in voids.

Apply a 0.5% dilution of T103.01 as a coarse, low-pressure spray. Against a light infestation of ants, or other pests, use the 0.25% dilution of T103.01. Use a straw tip or pin tip nozzle for crack and crevice applications. **Do not** apply T103.01 at a concentration higher than 0.5%. **Do not** reapply more often than every four weeks.

#### **Interior Applications in Non-Food-Handling Areas**

Spot or crack/crevice applications of T103.01 may be made in non-food/feed 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.

#### **Interior Applications in Food-Handling Areas**

Food-handling areas are areas where food and food products are held, processed, prepared or served. Application of T103.01 in food-handling areas of food-handling establishments is limited to spot or crack/crevice treatments. The food-handling area may not be in operation during application. Exposed food must be covered or removed prior to application. After application, all food contact surfaces in the treated areas must be washed with an effective cleaning compound followed by a potable water rinse before resuming food operations. **Do not** apply directly to food, food packaging or food contact surfaces.

### Limited Exterior Application to Structures

Exterior application of T103.01 is limited to spot and crack/crevice treatments where pests enter the structure such as around doors, windows, eaves, attic vents, and holes in exterior walls where utilities enter. Apply a maximum of 1.2 fl oz of dilution per 2 square feet.

### Storage and Disposal

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

**Pesticide Storage:** Store in original container in secure dry storage area. **Do not** store below 32 degrees F. **Do not** store in direct sunlight or heat.

**To Contain a Spill:** In case of spills, avoid contact and isolate area. To confine spills, dike surrounding area or absorb with sand, cat litter, commercial clay, gel or similar absorbents.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

#### Container Handling:

**Nonrefillable Container. Do not reuse or refill this container.** Triple rinse or pressure rinse container (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, or by other procedures approved by state and local authorities.

**Triple rinse containers small enough to shake (capacity  $\leq$  5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container  $\frac{1}{4}$  full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

**Pressure rinse as follows:** Empty to remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Raindrop is a registered trademark of Delavan Corporation.  
Teejet is a registered trademark of Spraying Systems Co.

Phantom® is a registered trademark of BASF Corporation.  
T103.01 is not manufactured or distributed by BASF Corporation, seller of Phantom®.

[EPA Approval Date]



**{LANGUAGE ON LABEL AFFIXED TO CONTAINER}**

**T103.01**

[Alternate Brand Name: Spectre Liquid Insecticide]  
Insecticide

For sale to, use and storage only by individuals/firms licensed or registered by the state to apply termiticide and/or general pest control products.

|                                 |               |
|---------------------------------|---------------|
| <b>Active Ingredient:</b>       | <b>By Wt.</b> |
| *Chlorfenapyr:.....             | 21.45%        |
| <b>Other Ingredients:</b> ..... | 78.55%        |
| <b>Total:</b> .....             | 100.00%       |

\*4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile.  
T103.01 contains 2.0 pounds of active ingredient per gallon

Contains chlorfenapyr, the active ingredient used in Phantom®. T103.01 is not manufactured or distributed by BASF Corporation, seller of Phantom®.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION/PRECAUCION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

| <b>FIRST AID</b>              |   |
|-------------------------------|---|
| <b>IF SWALLOWED:</b>          | <ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to by a poison control center or doctor.</li> <li>• Do not give anything to an unconscious person.</li> </ul> |
| <b>IF ON SKIN OR CLOTHING</b> | <ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>   |
| <b>IF INHALED</b>             | <ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>                                 |
| <b>IF IN EYES</b>             | <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>                                    |

**HOT LINE NUMBERS**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call SafetyCall: **1-844-685-9173**. For chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC: **1-800-424-9300**.

**PRECAUTIONARY STATEMENTS  
Hazards to Humans and Domestic Animals  
CAUTION**

Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS**

This pesticide is toxic to aquatic organisms, birds and wildlife. **Do not** apply directly to water or to areas where surface water is present or intertidal areas below the mean high water mark. **Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate.

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.

**PHYSICAL OR CHEMICAL HAZARDS**

**Do not** apply this product around electrical equipment due to the possibility of shock hazard.

**Storage and Disposal**

**Do not contaminate water, food or feed by storage or disposal.**  
**Pesticide Storage:** Store in original container in secure dry storage area. **Do not** store below 32 degrees F. **Do not** store in direct sunlight or heat.  
**To Contain a Spill:** In case of spills, avoid contact and isolate area. To confine spills, dike surrounding area or absorb with sand, cat litter, commercial clay, gel or similar absorbents.

**Pesticide Disposal:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Handling:**

**Nonrefillable Container. Do not reuse or refill this container.** Triple rinse or pressure rinse container (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, or by other procedures approved by state and local authorities.

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

**Pressure rinse as follows:** Empty to remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

**See label booklet for additional Precautionary Statements and Directions for Use.**

**Manufactured For:**  
Atticus, LLC  
5000 CentreGreen Way, Suite 100  
Cary, NC 27513

**EPA Reg. No.:** 91234-24  
**EPA Est. No.:**

**Net Contents:**