



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 6, 2020

Beth Anderson
Senior Regulatory Manager
Atticus, LLC
5000 CentreGreen Way, Suite 100
Cary, NC 27513

Subject: PRIA Label and CSF Amendment – Amending Proposing a new Basic CSF and Alternate CSF #1 as well as Label Changes
Product Name: A151.02
EPA Registration Number: 91234-97
Application Date: June 12, 2019
Decision Number: 552102

Dear Ms. Anderson:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are 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. 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.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 03/28/2019
- Alternate CSF 1 dated 03/28/2019

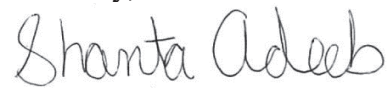
Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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.

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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.

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 Briana Hanlon by phone at (703) 347-8337, or via email at hanlon.briana@epa.gov.

Sincerely,



Shanta Adeeb, Product Manager 10
Invertebrate-Vertebrate Branch 2
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

[Note to reviewer: [Text] in brackets denotes optional or explanatory language
[Note to reviewer: {Text} in braces denotes where in the final label text will appear
{BOOKLET FRONT PANEL LANGUAGE}

PYMETROZINE	GROUP	9B	INSECTICIDE
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A151.02^[TM]

[Alternate Brand Name: Devenir]

[For control of aphids and whiteflies on landscape ornamentals, field-grown ornamentals, container-grown ornamentals, nonbearing fruit and nut trees in nurseries, Christmas trees, ground covers, and ornamental plants in greenhouses, lath and shadehouses, and interiorscapes]

Active Ingredient:	(% by weight)
Pymetrozine CAS No. 123312-89-0.....	50.0%
Other Ingredients:	50.0%
Total	100.0%

[A151.02] is a water-dispersible granule.

Contains pymetrozine, the active ingredient used in [Endeavor®].

KEEP OUT OF REACH OF CHILDREN CAUTION

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.)

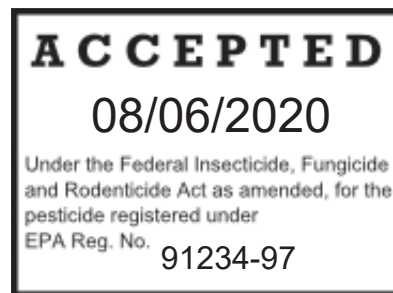
See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

EPA Reg. No.: 91234-97

EPA Est. No.:

Net Weight:
20181203a

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



[A151.02] is not manufactured, or distributed by Syngenta Crop Protection, LLC, seller of [Endeavor®].

{LANGUAGE INSIDE BOOKLET}

FIRST AID	
If on skin or clothing:	<ul style="list-style-type: none">• 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.
If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• 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 do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at 1-844-685-9173 for emergency medical treatment information.	

**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 absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, 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. Wear long-sleeved shirt and long pants, socks, shoes and waterproof gloves.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Gloves made of any waterproof material
- Shoes plus socks

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

Engineering Control Statements

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. 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 clothing.

Environmental Hazards

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water.

Physical and Chemical Hazards

Do not use, pour, spill, or store near heat or open flame.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Long-sleeved shirt and long pants
- Gloves made of any waterproof material
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to protect agricultural plants on farms, forests, nurseries, or greenhouses.

Do not enter treated areas without protective clothing until sprays have dried.

FAILURE TO FOLLOW DIRECTIONS AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY AND/OR POOR INSECT CONTROL.

USE INFORMATION

A151.02 is an insecticide that controls aphids and whiteflies on landscape ornamentals, field-grown ornamentals, container-grown ornamentals, nonbearing fruit and nut trees in nurseries, Christmas trees, ground covers, and ornamental plants in greenhouses, lath and shadehouses, and interiorscapes.

Mode of Action

A151.02 has a mode of action that controls aphids and whiteflies by stopping their feeding activity. These insects stop feeding within hours, but remain on the plant for a short time (2-4 days). A151.02 has residual activity in the plant after spraying.

Suitability for Integrated Pest Management Programs

A151.02 is suitable for Integrated Pest Management (IPM) programs as it has low toxicity to beneficial insect (including honeybees and bumblebees) and mite populations.

Use Restrictions

Do not apply aerially.

Do not apply more than 10 oz/A per application.

For outdoor use, do not apply more than 48 oz/A per year.

For indoor use, do not apply more than 100 oz [48 oz in CA only]/A per year.

Chemigation

Do not apply this product through any type of irrigation system.

Phytotoxicity

A151.02 has been evaluated for phytotoxicity on many greenhouse, nursery, and ornamental plants. All plants tested under university research and commercial production conditions have not shown phytotoxicity at labeled

rates of A151.02. While many species and cultivars have been tested, a small group of each specie and cultivar should be evaluated for phytotoxicity two weeks prior to making applications to the entire crop. Applications should not be made to poinsettia after bract formation.

Resistance Management Recommendations

For resistance management, A151.02 contains a Group 9B insecticide. Any insect population may contain individuals naturally resistant to A151.02 and other Group 9B insecticides. The resistant individuals may dominate the insect population if this group of insecticides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

To delay insecticide resistance, take the following steps:

- Rotate the use of A151.02 or other Group 9B insecticides within a growing season, or among growing seasons, with different groups that control the same pests. *[Note: If a number of applications are necessary each year on a pest-by-pest basis, this statement may be modified as follows: "* Avoid application of more than (maximum number) and consecutive sprays of A151.02 or other insecticides in the same group in a season.
- Use tank mixtures with insecticides from a different group that are equally effective on the target pest when such use is permitted. Do not rely on the same mixture repeatedly for the same pest population. Consider any known cross-resistance issues (for the targeted pests) between the individual components of a mixture. In addition, consider the following recommendations provided by the Insecticide Resistance Action Committee (IRAC):
 - o Individual insecticides selected for use in mixtures should be highly effective and be applied at the rates at which they are individually registered for use against the target species.
 - o Mixtures with components having the same IRAC mode of action classification are not recommended for insect resistance management.
 - o When using mixtures, consider any known cross-resistance issues between the individual components for the targeted pest(s).
 - o Mixtures become less effective if resistance is already developing to one or both active ingredients, but they may still provide pest management benefits.
 - o The insect resistance management benefits of an insecticide mixture are greatest if the two components have similar periods of residual insecticidal activity. Mixtures of insecticides with unequal periods of residual insecticide activity may offer an insect resistance management benefit only for the period where both insecticides are active.
- Adopt an integrated pest management program for insecticide use that includes scouting, uses historical information related to pesticide use, crop rotation, record keeping, and which considers cultural, biological and other chemical control practices.
- Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, consult with your local university specialist or certified pest control advisor.
- Contact your local extension specialist or certified crop advisors for any additional pesticide resistance-management and/or IPM recommendations for the specific site and pest problems in your area.

- For further information or to report suspected resistance contact Atticus, LLC at (984) 465-4776.

SPRAY EQUIPMENT

- Use sufficient water to provide thorough, uniform coverage.
- Use sprayer nozzles that provide accurate, uniform application.
- Calibrate sprayer to insure delivery of adequate spray volume per unit area.
- To avoid spray drift, do not apply when conditions favor drift beyond the target area.
- Avoid spray overlap, as crop injury may occur.

MIXING PROCEDURES

Prepare no more spray mixture than is needed for the immediate operation. Thoroughly clean spray equipment before using this product. Vigorous agitation is necessary for proper dispersal of this product. Maintain maximum agitation throughout the spraying operation. Do not let the spray mixture stand overnight in the spray tank. Flush the spray equipment thoroughly following each use and apply the rinsate to a previously treated area.

A151.02 Alone: Add ½ of the required amount of water to the mix tank. With the agitator running, add A151.02 to the tank. Continue agitation while adding the remainder of the water. Begin application of the solution after the A151.02 has completely dispersed into the mix water. Maintain agitation until all of the mixture has been applied.

A151.02 + Tank Mixture: A151.02 is compatible with most insecticide and fungicide products. However, the physical compatibility of A151.02 with tank mix partners should be tested before use. To determine the physical compatibility of A151.02 with other products, use a jar test.

Using a 1½ qt jar, add the proportionate amounts of the products to 1 qt of water. Add wettable powders and water-dispersible granular products first, then liquid flowables, and emulsifiable concentrates last. After thoroughly mixing, let stand for at least 5 minutes. If the combination remains mixed or can be remixed readily, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank.

If mixture is physically compatible, add ½ of the required amount of water to the mix tank. Start the agitator before adding any tank mix partners. Add products in this order: products packaged in water-soluble packaging, wettable powders, wettable granules (dry flowables) such as A151.02, liquid flowables, liquids, and emulsifiable concentrates.

Always allow each tank mix partner to become fully dispersed before adding the next product. Provide sufficient agitation while adding the remainder of the water. Maintain agitation until all the mixture has been applied.

Note: If using A151.02 in tank mixtures, all products in water-soluble packaging should be added to the tank before any other tank mix partner, including A151.02. Allow the water-soluble packaging to completely dissolve and the product(s) to completely disperse before adding any other tank mix partner to the tank.

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture. This product should not be mixed with any product which prohibits such mixing. Tank mixtures or other applications of products referenced on this label are permitted only in those states in which the referenced products are labeled.

APPLICATION DIRECTIONS

When target pests appear and conditions do not favor drift beyond the target area, apply foliar spray mixture uniformly to all plant surfaces, particularly the stem and leaf undersides, to point of runoff. Avoid spray overlap that could cause phytotoxicity. Use the following rates and retreatment intervals.

Pests	Type of Application & Sites	Application Rates for A151.02	Retreatment Intervals
Whiteflies, including Silverleaf Whitefly <i>(Bermisia argentifolii)</i> , Greenhouse Whitefly <i>(Trialeurodes vaporariorum)</i> Aphids including: Green Peach Aphid <i>(Myzus persicae)</i> , Melon Aphid <i>(Aphis gossypii)</i>	Ground Foliar Spray Ornamentals	2.5 – 5.0 oz/100 gals water Maximum rate of 10 oz/A	7-days – severe insect pressure 14-days – normal insect pressure

Note: On hand-to-wet plants, add a nonionic or organosilicone-based surfactant to improve coverage. Follow product’s use directions and rate recommendations.

Restrictions

Do not apply more than 10 oz/A per application.

For outdoor use, do not apply more than 48 oz/A per year.

For indoor use, do not apply more than 100 oz/A per year.

In CA only: For indoor use, do not apply more than 48 oz/A per year.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a tightly closed container in a cool, dry place. Product is hydroscopic.

PESTICIDE DISPOSAL: Pesticide spray mixture or rinsate that cannot be used should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the 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:

[**Bag:** Nonrefillable outer bag. Do not reuse or refill the outer bag. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by other procedures allowed by state and local authorities]

[**Plastic Container:** Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. 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. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures allowed by state and local authorities.]

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. To the extent consistent with applicable law, all 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.

[A151.02] is a trademark of Atticus, LLC

[Endeavor®] [is a] registered trademark of the Syngenta Group Company.

Viton® is a trademark of E.I DuPont de Nemours and Company.

{LANGUAGE ON LABEL AFFIXED TO CONTAINER}

A151.02™

[Alternate Brand Name: Devenir]

[For control of aphids and whiteflies on landscape ornamentals, field-grown ornamentals, container-grown ornamentals, nonbearing fruit and but trees in nurseries, Christmas trees, ground covers, and ornamental plants in greenhouses, lath and shadehouses, and interiorscapes]

Active Ingredient:	(% by weight)
Pymetrozine CAS No. 123312-89-0.....	50.0%
Other Ingredients	50.0%
Total	100.0%

[A151.02] is a water-dispersible granule.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.)

FIRST AID	
If on skin or clothing:	<ul style="list-style-type: none"> 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.
If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for treatment advice.
If swallowed:	<ul style="list-style-type: none"> 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 do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at 1-844-685-9173 for emergency medical treatment information.	

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 absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, 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. Wear long-sleeved shirt and long pants, socks, shoes and waterproof gloves.

ENVIRONMENTAL HAZARDS: Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a tightly closed container in a cool, dry place. Product is hygroscopic.

PESTICIDE DISPOSAL: Pesticide spray mixture or rinsate that cannot be used should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the 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:

[Bag: Nonrefillable outer bag. Do not reuse or refill the outer bag. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by other procedures allowed by state and local authorities]

[Plastic Container: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. 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. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures allowed by state and local authorities.]

See inside 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. 91234-97
EPA Est. No. _____
NET WEIGHT: _____
20181203a