



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Claire Manufacturing Company
c/o Ms. Kim Davis
RegWest Company, LLC
8203 West 20th Street, Suite A
Greeley, CO 80634-4696

DEC - 2 2010

Dear Ms. Davis:

Subject: Amendment: Consolidate previous versions of label
Claire Bed Bug, Lice and Dust Mite Spray
EPA Reg. No. 706-110
Your submission dated September 9, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) section 3(c)(7)(a), is acceptable provided the following revisions are made prior to release for shipment under the amended labeling:

1. Replace the word "bedding" with "mattresses" throughout the label wherever it appears in the marketing claims and various directions for use. Bedding can imply use on sheets, blankets, and pillowcases. The use patterns involving beds (Bedbugs and Lice) clearly state that it is the bare mattress that is to be treated, not the sheets and pillowcases.
2. In accordance with item 1 above, at the end of the label delete the pictogram of the lady spraying the made bed (pillowcases, sheets, and blanket) since this contradicts the directions for use. The pictogram of the lady spraying the bare mattress may remain.
3. In the marketing claims, revise "ticks that can cause Lyme Disease to "ticks that transmit Lyme Disease".
4. The Agency questions the location of READ ENTIRE LABEL BEFORE EACH USE as part of the directions for use on dogs. Perhaps this was intended to appear at the end of the label, but subsequently other uses have been added after that statement.

A stamped copy of the label is enclosed for your records. Please submit two copies of the revised amended labeling prior to release for shipment.

The Agency notes that this product label has not been brought into compliance with the Agency's June 4, 2009 guidance letter regarding required changes for pyrethroid product labeling. The indoor use site "floor drains (to sewers)" will require addition of the restriction regarding use around drains to your Precautions and Restrictions section for Indoor uses. Outdoor uses (Ornamental plants) will require additions of limitations to the directions for use for that site. You may submit the revisions required by that letter as a Notification (be sure to include the revisions listed above for this current amendment on labeling submitted with that Notification).

Please note that to be in compliance with 40 CFR 156.10(i) the Directions for Use must specify the acceptable use sites, not just a listing of pests with implied use sites. Currently, the only listing of sites is an optional marketing claim. Please refer to Chapter 11 of the label Review Manual for guidance. In addition, general headings such as Indoor; Outdoor (Ornamental Plants only); Pets (Dogs only); Livestock and their Premises; Clothing Treatment; and Treatment of Nets, Tents, Sleeping Bags and Backpacks would assist in guiding users to specific sets of directions. Specific use sites could then be listed under appropriate headings. Please note that no further amendments to this product will be accepted until it is brought into compliance with 40 CFR 156.10(i).

If you have any questions regarding this letter, please contact Dana Pilitt, PhD of my staff at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov.

Sincerely,



Richard Gebken
 Product Manager 10
 Insecticide Branch
 Registration Division (7505P)

Claire® Bed Bug, Lice and Dust Mite Spray

{ABN: Claire® Lice Killer}

{{Select marketing claims from "Marketing Claims" section}}

Active Ingredient:
 Permethrin* (CAS No. 53645-53-1) 0.5%

Other Ingredients** 99.5%

Total 100.0%

*Cis/trans ratio: Max. 55% (±) cis and Min. 45% (±) trans.
 **Contains petroleum distillate

**Keep Out of Reach of Children
CAUTION**

See back panel for First Aid and Additional Precautionary Statements.

[PRECAUCION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. (TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)]

EPA Reg. No. 706-110 EPA Est. _____

Net Weight: ____ oz. (____ g.)

{Back Panel}

DIRECTIONS FOR USE

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

{Products not for use on plants may omit the following paragraph:}

Not for use on plants being grown for sale or other commercial use, for commercial seed production or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

{Products solely for domestic/residential dwellings use may omit the following paragraph:}

Do not use in food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where food may be prepared or held. Non-food areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries, vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage areas (after bottling or canning).

{Products solely for commercial use may omit the following paragraph:}

In the home, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food. Those with asthma or severe allergies should consult their medical professional before using this product and have someone else apply this product.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
DEC - 2 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
706-110**

Precautions and Restrictions

Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before space spraying or surface applications. This product is not for use on humans. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

Shake Well Before Using

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches; 8 to 10 inches for clothing, furniture and bedding. Prior to application, test product on an inconspicuous area to test for unwanted effects (discoloration or bleeding, for example). Spray until surface is damp; do not spray to the point of run-off as over-application may cause damage. This product will not stain surfaces or fabrics where water alone causes no damage.

Black Flies, Blow Flies, Fruit Flies, Gnats, Houseflies, Mosquitoes, Skipper Flies and Small Flying Moths:

Close all doors and windows and spray room at the rate of 2 to 3 seconds per 1000 cubic feet. Direct spray to all parts of the room, especially windows and other light sources that attract these insects. Keep the nozzle in constant motion. Retreat if reinfestation occurs, but not more than once every two weeks.

Centipedes, Cockroaches, Crickets, Firebrats, Millipedes, Palmetto Bugs, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders and Waterbugs: Spray into hiding places such as cracks and crevices; behind sinks and cabinets; along baseboards and floors; around drains and plumbing, hitting insects with spray whenever possible. Retreat if reinfestation occurs, but not more than once every two weeks.

Ants: Spray trails, nests and structures' points of entry. Spray on ants whenever possible and retreat if reinfestation occurs, but not more than once every two weeks.

Angoumois Grain and Indian Meal Moths: Close doors and windows. Direct spray into all parts of the room, especially around stored food product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1000 cubic feet of space. Keep area closed for 15 minutes following treatment. Retreat if reinfestation occurs, but not more than once every two weeks.

Exposed stages of Confused Flour Beetles, Grain Mites, Granary Weevils, Red Flour Beetles, Rice Weevils and Saw-Toothed Grain Beetles: Spray into cracks and crevices; around cartons or containers; or other areas where these insects tend to congregate. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. Retreat if reinfestation occurs, but not more than once every two weeks. Dispose of infested stored food products in the home.

Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves and carpets. Retreat if reinfestation occurs, but not more than once every two weeks.

Bed Bugs: Spray mattresses, particularly around tufts and seams. Take beds apart and spray into all joints. After mattress is dry, cover with mattress cover and sheet; do not use mattress without cover. Treat baseboards, moldings and floors. Retreat if infestation occurs, but not more than once every two weeks.

To Control Carpet Beetles and Clothes Moths on wool and other proteinaceous fibers: Remove infested articles from storage, thoroughly brush then air for several hours in sunlight, if possible. Apply spray to empty chests, closets, bureaus and other storages directing the spray into cracks, joints and crevices. After airing, infested articles may be lightly sprayed, keeping nozzle at least three feet from fabric to avoid staining.

To [Helps] Control [Kill] House Dust Mites (*Dermatophagoides* spp.): This product [product name] controls [helps control] house dust mites that may cause asthma, rhinitis, watery eyes and sneezing. One treatment lasts up to 8 weeks [2 months] [60 days]. Vacuum entire area once spray has dried. Since vacuuming stirs dust up on the air,

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those with allergies should have another person vacuum or wear a dust mask and use a vacuum with a high efficiency particulate (HEPA) filter. **Upholstery:** Prior to use on upholstered furniture, test the fabric in an inconspicuous place to ensure dyes will not bleed. Hold container upright with the nozzle pointed away from you. Depress valve and spray from a distance of 8 to 10 inches. Do not use on delicate fabrics. Allow furniture to thoroughly dry before using. **Carpets:** Spray over entire carpet area. Hold the nozzle approximately 12 to 18 inches from the carpet surface and spray in a sweeping motion. Use an overlapping pattern to ensure total coverage. After application, brush the surface of the carpet with a broom or brush to ensure deep penetration. Allow carpet to completely dry before re-entering the treated area. Drying time may be accelerated by using a fan. **Mattresses:** Spray the top, bottom and sides of mattresses, paying particular attention to tufts and seams. Allow to thoroughly dry before using. After mattress is dry, cover and sheet; do not use mattress without cover.

Fleas and Ticks (Adults and Larvae): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering, paying special attention to cracks and crevices; around baseboards; and window and door frames. Infested upholstered furniture may also be treated with this product. Test upholstery or drapery fabrics in an inconspicuous place before application.

This product is Step 3 in the {company name's} Lice Control System:

Step 1: Kill lice with {product name}. Reapply in 10 days.

Step 2: Comb out eggs and nits with {product name}.

Step 3: Clean home. Use this product [product's name] spray for non-washable items. Wash washable items in hot water and dry in high heat.

To Kill Lice and Louse Eggs: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect after drying, then proceed to spray entire area to be treated. Hold container upright with nozzle pointing away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square foot for three seconds. Allow all sprayed articles to thoroughly dry before use. Spray only those garments and parts of bedding, including mattresses and furniture, that cannot be either laundered or dry cleaned. Do not use on sheets or pillowcases. If lice infestations occur on humans, use a product labeled for use on humans.

In animal quarters and milk rooms for rapid control of Houseflies, Mosquitoes and Small Flying Moths: Close windows and doors and spray at the rate of 2 seconds per 1000 cubic feet of space. For best results, keep area closed for 10 minutes after spraying; do not remain in treated area. Ventilate after treatment is completed. Do not contaminate animal feed or water during application.

To treat livestock: To protect beef cattle, dairy cattle, goats, hogs, horses and sheep from attacks of Deer Flies, Face Flies, Gnats, Horn Flies, Horse Flies, Houseflies, Mosquitoes and Stable Flies: Spray about 3 seconds on each side being careful to thoroughly spray back, withers and forelegs. **To protect from Face Flies,** spray the face and head, but do not spray into eyes. Repeat treatment when flies are troublesome.

To kill Screw Worms infesting beef cattle, horses and sheep: Hold can about 4 to 8 inches from area to be treated with nozzle pointed at wound. Spray the area until it is completely wet (three to ten seconds are usually enough). Spray the area surrounding the wound. This product is not recommended for use in deep wounds. Some strains of screw worms may develop resistance to pyrethroids; this will be observed by lack of response to treatment. Where pyrethroid resistance is known or suspected, do not use this product.

For swine: Do not ship animals for slaughter within 5 days of last treatment.

To control Blood Sucking Lice: Apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

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To control Poultry Lice: Thoroughly spray roosts, walls and nests or cages then spray a fine mist over the birds.
For control of Bed Bugs and Mites in poultry houses: Spray crevices of roost poles, cracks in walls and in nests where the bed bugs and mites hide. Spray to the point of dampness but not run-off.

For the control of Garden Insects: To kill Aphids, Armyworms, Clover Mites, Exposed Thrips, Japanese Beetles, Lace Bugs, Leafminers, Pavement Ants, Red Mites, Spider Mites and Whiteflies: Using a sweeping motion from a distance of at least 18 inches, directly spray insects whenever possible on African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, crassula, dahlias, delphiniums, dogwood, English ivy, euonymus, fuchsia, geraniums, grape vine, Kentia palm, laurel, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews, zinnias and other ornamentals. Spray in one second bursts and be cautious about wetting tender foliage, young plants and new growth. Over-application may cause damage. Do not spray plants when temperature exceeds 90°F (32°C). Reapply if reinfestation occurs, but not more than once every 2 weeks. Spray may be used on plants, as well as a multi-purpose spray in small gardens, and for spot treatments of incipient insect infestations to prevent spreading to large garden areas.

**READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS**

To Control Fleas, Ticks and Lice on Dogs: Starting at the tail, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to ensure penetrating the coat. Dampen the fur up to the head. Retreat if infestation occurs, but not more than once every two weeks. Do not spray directly in/on eyes, mouth or genitalia of dogs. Do not use on dogs under twelve (12) weeks old. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals. Sensitivities may occur after using any pesticide product for pets. If signs of sensitivity occur, bath your pet with mild soap and rinse with large amounts of water. If signs continue, immediately consult a veterinarian.

Clothing Treatment

Treat only clothing; do not apply to skin.

For protection against Ticks, including those that may carry Lyme disease, and Mosquitoes: Apply product as directed below. For further protection, use in conjunction with an insect repellent registered for direct application to the skin and utilize the following primary preventive measures: Avoid areas where the pests are found, wear appropriate protective clothing (light-colored, long-sleeved shirt and long pants tucked into socks) and inspect body daily for ticks. Wear pant cuffs inside the socks or footwear to ensure full protection against ticks.

Initial Treatment Instructions:

1. Select a well-ventilated outdoor area protected from wind and lay out the clothing to be treated (as a complete outfit: shirt, trousers and socks).
2. Hold can upright about 6 to 8 inches from clothing surface and spray with a slow, sweeping motion to lightly moisten the fabric surface.
3. Continue spraying over entire outfit, until a total treatment time of 60 seconds has elapsed and the outer fabric surface is moist enough to cause a slight color change or darkening. Pay special attention to socks and trouser & shirt cuffs.
4. Turn over the clothing and treat the other side as directed in steps 2 and 3.
5. Hang the treated clothing and allow to dry for at least 2 hours (4 hours under humid conditions) before wearing.
6. One can treats {number} complete outfit[s]. Do not exceed recommended spraying times.

Retreatment Instructions:

This product contains an active ingredient that actually binds to the fabric being treated, providing residual protection that lasts a minimum of two weeks, and holds up through several machine washings. **Do not retreat clothing more than once every two weeks. Launder clothing at least once before retreating.** Follow the instructions for initial treatment when retreating articles.

Treatment of Nets, Tents, Sleeping Bags and Backpacks

Do not treat the inside of sleeping bags. Spray only the exterior surfaces of tents.

Initial Treatment Instructions:

Select a well-ventilated outdoor area protected from wind and lay out article to be treated. Hold can upright about 6 to 8 inches from surface of the article and spray with a slow, sweeping motion to lightly moisten the fabric surface. Continue spraying over entire article until the article's outer surface is moist enough to cause a light color change or darkening. Turn over the article and treat the other side as described for the first side. Hang the treated article and allow it to dry for at least 2 hours (4 hours under humid conditions) before using.

Retreatment Instructions:

This product contains an active ingredient that actually binds to the fabric being treated, providing residual protection that lasts a minimum of two weeks. **Do not retreat articles more than once every two weeks.** Follow the instructions for initial treatment when retreating articles.

Storage and Disposal

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

Pesticide Storage: Store in a cool, dry area inaccessible to children and pets and away from heat, sparks and open flame. Do not freeze. **Disposal:** Non-refillable container; do not refill or reuse this container. Do not puncture or incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}

First Aid	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-866-836-8855 for emergency medical treatment information.	
If on Skin:	<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 Swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
Note to Physician: May pose an aspiration pneumonia hazard. Contains petroleum distillate.	

{Note: The grid format will be used if market label space permits; otherwise a paragraph format will be used.}

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PRECAUTIONARY STATEMENTS

Hazards to Humans [& Domestic Animals]

CAUTION: Contains petroleum distillate. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

{Products solely for indoor use may omit the "Environmental Hazards" section}

Environmental Hazards

This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

Physical or Chemical Hazards

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

[Manufactured by:]

[A Product of:]

Claire Manufacturing Company

500 Vista Avenue • Addison, IL 60101
[800-252-4731]

{Marketing Claims:}

For use in animal quarters, gardens, homes, milk rooms, pet areas, poultry houses and non-food areas of apartments, hospitals, hotels, kennels, motels, nursing homes, offices, restaurants, schools and warehouses. [A] Water-based aerosol. Odorless. For bedding and furniture. Not for use on humans. Home lice control spray for bedding and furniture. For use on backpacks, beef cattle, clothing, dairy cattle, dogs, goats, hogs, horses, livestock, mattresses, nets, sheep, sleeping bags, tents and wool and other proteinaceous fibers. Will not stain water-safe fabrics and surfaces.

No CFCs. {Logo Graphic} Contains no CFCs which deplete the ozone layer. Federal regulations prohibit CFC propellants in aerosols.

Controls listed pests. Kills adult lice, and nymphs as they hatch, on bedding, garments, furniture and other inanimate objects. Kills dust mites through contact.

Controls listed residential, industrial and garden insects. Kills and repels mosquitoes and ticks. Controls [and repels] ticks that can cause Lyme Disease. For use on premises to control fleas and ticks. Controls pests up to 4 weeks [1 month]. Kills lice and their eggs on mattresses, furniture, car interior and other non-washable items. Kills [Helps control] house dust mites (*Dermatophogoides* spp.) for up to 8 weeks [2 months] [60 days] in carpets, curtains and on upholstery. Controls [Helps control] house dust mites that may cause asthma, rhinitis, watery eyes and sneezing. Effective in the control of dust mites. 1-2-3 Lice Control System. Step 3.

One clothing [fabric] treatment lasts 2 weeks. For treatment of clothing, nets, sleeping bags and backpacks.

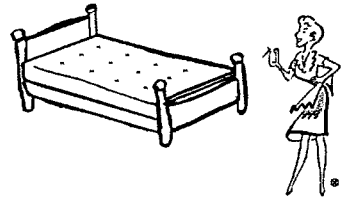
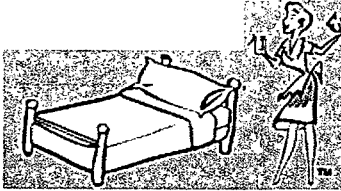
For use on dogs and on premises to control fleas and ticks. Controls fleas and ticks on dogs for 14 days [2 weeks].

Kills screw worms on beef cattle, horses and sheep.

Kills [Controls] Angoumous grain moths, ants, aphids, armyworms, bed bugs, black flies, blood sucking lice, blow flies, carpet beetles, centipedes, clothes moths, clover mites, cockroaches, confused flour beetles*, crickets, deer flies, exposed thrips, face flies, firebrats, fleas (adult and larvae), fruit flies, gnats, grain mites*, granary weevils*, horn

flies, horse flies, house dust mites (*Dermatophagoides* spp.), houseflies, Indian meal moths, Japanese beetles, lace bugs, leafminers, lice/louche eggs, millipedes, mites, mosquitoes, palmetto bugs, pavement ants, pillbugs, poultry lice, red flour beetles*, red mites, rice weevils*, saw-toothed grain beetles*, scorpions, screw worms, silverfish, skipper flies, small flying moths, sowbugs, spider mites, spiders, stable flies, ticks (adult and larvae), waterbugs and whiteflies. *Exposed stages.

We assure your complete satisfaction with a 100% money-back guarantee on this {brand name} product.



- [] Denotes alternate/optional language
- { } Denotes language that does not appear on the market label