



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 23, 2015

Kelly Rahn
AMVAC Chemical Corporation
4695 MacArthur Court, Suite 1200
Newport Beach, CA 92660

Subject: Label Amendment – Addition of IPM Language
Product Name: Small BB Pest Strip
EPA Registration Number: 5481-9025
Application Date: April 13, 2015
Decision Number: 503914

Dear Ms. Rahn:

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. 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 Carlyn Petrella by phone at 703-347-0439, or via email at petrella.carlyn@epa.gov.

Sincerely,

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

Richard Gebken
Product Manager 10
Invertebrate & Vertebrate Branch 2
Office of Pesticide Programs

Enclosure

SMALL BB PEST STRIP

Insecticide

For use on Bed Bugs and Bed Bug Eggs
(See last page for Marketing Claims)

ACCEPTED

07/23/2015

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No.

5481-9025

ACTIVE INGREDIENT:

Dichlorvos (2,2-dichlorovinyl dimethyl phosphate).....18.6%

Related Compounds.....1.4%

OTHER INGREDIENTS:.....80.0%

This product contains the toxic inert ingredient Bis (2-ethylhexyl) adipate (DEHA) at 19.8%.

WARNING

KEEP OUT OF REACH OF CHILDREN

See Back [Side] Panel for Additional Precautionary Statements

EPA Reg. No. 5481-9025

EPA Est. No. _____

Net Weight: 16 g (0.56 oz)

or Contains 2 strips, 16 g (0.56 oz) each, Total Net Weight 32 g (1.12 oz)

AMVAC Chemical Corporation

4100 E. Washington Boulevard, Los Angeles, CA 90023 U.S.A.

1-888-462-6822

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: May be fatal if swallowed. Do not get in mouth. Harmful if inhaled. Causes moderate eye irritation. Avoid breathing vapors. Avoid contact with eyes or clothing. After prolonged storage, a small amount of liquid may form on strip. Do not get liquid in eyes. 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. Do not use in hospitals or clinic rooms, such as patient rooms, wards, nurseries, operating or emergency areas. Do not use in closets and wardrobes of rooms where infants, children and the sick or aged are or will be present for any extended period of confinement. Do not use in kitchens, restaurants or areas where food is prepared or served. Do not use in any area where people will be present for extended periods of time. Not to be taken internally by humans or animals.

FIRST AID

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 by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.• Call a poison control center or doctor for further 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 ON SKIN	<ul style="list-style-type: none">• Take off contaminated clothing.

OR CLOTHING	<ul style="list-style-type: none"> • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
<p>NOTE TO PHYSICIAN</p> <p>Probable mucosal damage may contraindicate the use of gastric lavage.</p>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p> <p>FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:</p> <p>For Medical Emergencies phone:.....1-888-681-4261</p> <p>For Transportation Emergencies, including spill, leak or fire, phone: CHEMTREC.....1-800-424-9300</p> <p>For Product Use Information phone: AMVAC.....1-888-462-6822</p>	

STOP! READ ENTIRE LABEL BEFORE USE

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Remove *pre-assembled* SMALL PEST STRIP from sealed bag when ready to use. SMALL PEST STRIP can only be used to treat articles that are placed in the bag which accompanies the strip.

For Treatment of Bed Bugs and Bed Bug Eggs

Pest strip [product name] is used to treat crawling bed bug nymphs, adults and eggs exposed to product vapors. Use Pest strips [product name] to treat bed bugs that are in household items including: [electronics], [appliances], [footwear], [art work], [collectibles], [clocks], [radios], [wall hangings], [telephones], [computers], [printers], [mattresses], [box springs], [luggage], [books],[lamps], [furniture], [clothes] and other similar items which can be placed in the bag included with the pest strip. Do not allow children to handle treatment bags or new or used pest strips.

To Treat Mattress and Box Spring:

Place mattress and/or box spring inside [large] [king size] plastic bag. [For a king size mattress], allow for [5 inches of] space between each side of the mattress and the bag. Make sure bag can be sealed with mattress inside. Insert 1 [one] bed bug pest strip in bag, placing it near the center of the mattress to allow for an even treatment.

NOTE TO REVIEWER: If a plastic band or twist tie is provided with this product, these directions will be used on the product label:
 [Gather open end of bag together and twist several times to seal in contents. Secure twisted bag end with included (plastic bands)(twist tie) to ensure bag remains sealed for duration of treatment. If (plastic band)(twist tie) is lost or broken, fold the open top end of bag several times to seal in contents. Secure folded bag end with (adhesive strips)(tape) to ensure bag remains sealed for the duration of the treatment.]

NOTE TO REVIEWER: If an adhesive strip or tape is provided with this product, these directions will be used on the product label:
 [Fold open top end of bag several times to seal in contents. Secure folded bag end with included (adhesive strips)(tape) to ensure bag remains sealed for duration of treatment].

[Do not tuck the edges of the bag under the mattress.] It is important to leave air space within the treatment bag [so that the vapors can circulate around the items being treated and] to enhance the exposure to the product vapors. [Mattress box spring can be treated in an additional bag following the same mattress instructions.] Do not put more than one strip in each bag. Do not sleep or lay on mattress while in treatment bag or during the ventilation period.

To Treat Luggage or other household items:

Unzip and open all luggage compartments so air can freely circulate. Place luggage or other household items in treatment bag with one bed bug pest strip, placing it near the center of the item to allow for an even treatment.

NOTE TO REVIEWER: If a plastic band or twist tie is provided with this product, these directions will be used on the product label:
 [Gather open end of bag together and twist several times to seal in contents. Secure twisted bag end with included (plastic bands)(twist tie) to ensure bag remains sealed for duration of treatment. If (plastic band)(twist tie) is lost or

broken, fold the open top end of bag several times to seal in contents. Secure folded bag end with (adhesive strips)(tape) to ensure bag remains sealed for the duration of the treatment.]

NOTE TO REVIEWER: If an adhesive strip or tape is provided with this product, these directions will be used on the product label:

[Fold open top end of bag several times to seal in contents. Secure folded bag end with included (adhesive strips)(tape) to ensure bag remains sealed for duration of treatment].

[Do not tuck the edges of the bag under the luggage or other household item.] It is important to leave air space within the treatment bag [so that the vapors can circulate around the items being treated and] to enhance the exposure to the product vapors.

Treatment:

To kill bed bug nymphs and adults, treat mattress or box spring and luggage or other household items in sealed bag for a minimum of 48 hours.

To kill bed bug eggs, treat mattress or box spring and luggage or other household items in sealed bag for a minimum of 7 days.

When treatment is complete:

Remove treated items from bag and let air out in a well ventilated area for no less than 4 hours. Do not use treated items during the ventilation period. Dispose of plastic treatment bag and used bed bug pest strip in trash immediately. Dispose of in a manner that prevents reuse.

It is also recommended that you utilize a direct spray product registered by the USEPA for application to other areas of the room that may harbor bed bugs.

STORAGE AND DISPOSAL

Storage: Do not contaminate water, food or feed by storage or disposal. Do not open or remove from package before ready to install. Store in a cool dry place.

Foil Pouch

Do not open or remove from package before ready to use. **Disposal: If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Outer Container

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or dispose of the empty container in trash.

WARNING—KEEP THIS BAG AWAY FROM BABIES AND CHILDREN. DO NOT USE IN CRIBS, BEDS, CARRIAGES OR PLAY PENS. THIS BAG IS NOT A TOY AND MAY CAUSE SUFFOCATION.

Proposition 65: [Warning] [Notice]: This product contains a chemical known to the State of California to cause cancer. [OPTIONAL FOR USE IN CALIFORNIA]

*If you are not satisfied with this product for any reason send your written request for a refund to the address below, together with the dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or Comments? Call 1-800-XXX-XXXX

[Manufactured for and Distributed by: _____]

Marketing Claims

- Kills Bed bugs [and bed bug eggs]
- Prevents bed bug eggs from hatching

- Kills bed bug eggs
- Treats [up to] (X) [king] [queen] [full] [twin] size mattresses and box springs
- Treats twin, full, queen and king size mattresses [and box springs]
- Treats 2 twin mattresses and 2 twin box springs or 1 Full, Queen or King size mattress and box spring.
- [Can also be used to] treat(s) luggage
- Contains (X) bed bug pest strips (and) (contains) (X) (large) (king size) mattress treatment bags
- (and) (contains) (X) (x gallon) luggage treatment bags
- Results Guaranteed * See back [side] for terms of guarantee
- Money Back Guarantee * See back [side] for terms of guarantee
- [Fill out "treatment warning notice" and affix to treatment bag].
- Large bag holds and treats up to a king size mattress
- Treats non-washable items
- Also use to seal and dispose of infested items
- Includes Bed Bug Pest Strip and Sealable Treatment Bag

[Product Name] Fact Box

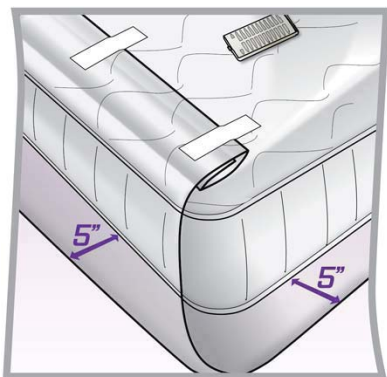
Where to Use: Treats non-washable items. Also use to seal and dispose of infested items.

Application: Seal infested household items in bag for 7 days to kill the bed bug eggs.

How Often to Use: One time use. Can use bag to dispose of infested items.

DO NOT OVERFILL BAG.

[OPTIONAL GRAPHICS]:





(Note to Reviewer: The text on this page will appear on the back label panel of the product)

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process]
 [GRAPHICAL ICON identifying the steps: Detection, Treatment, Prevention]



FOR BEST RESULTS USE THIS PRODUCT AS PART OF A COMPREHENSIVE BED BUG TREATMENT PLAN. Visit our website, www.hotshot.com, for more information.

Treating bed bugs as part of a cycle is key to gaining control. Because infestations may be at a different part of the cycle when treatment begins, the information below will help you determine the best place to begin.

DETECTION

If you have not seen any bed bugs or are in prevention mode and want to ensure you are still bed bug free, you want to detect using a combination of the following products:

- **[Hot Shot® Bed Bug] Interceptor**
- **[Hot Shot Bed Bug] Coaster**
- **[Hot Shot® Bed Bug] Glue Traps**

TREATMENT

If you have detected bed bugs by using the products above, being bitten or observing bed bugs, bed bug eggs or excrement in mattress tufts and bedding, you want to choose from one or more of the following product types depending on your needs:

- **Use an aerosol product registered to treat bed bugs [and bed bug eggs] in cracks and crevices.**
- **Use a ready-to-use liquid product registered to treat bed bugs [and bed bug eggs] for spot treatment.**
- **Use a total release fogger registered to treat bed bugs [and bed bug eggs] for areas such as carpet, mattress & box spring surfaces and furniture surfaces.**
- **Use a mattress treatment kit registered to treat bed bugs [and bed bug eggs] for mattresses and other household items.**

PREVENTION

To help prevent the spread of bed bugs from already infested areas into uninfested areas, you want to use an appropriate mattress and box spring encasement.

(Note to Reviewer: The following text is optional language educating the consumer on the steps necessary to approach a bed bug problem. When included in the label, the text in full will be on the product label which will be firmly affixed to the product container).

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process]

Detection

While bites may be the first indicator you have a bed bug problem, bites alone are not proof you have a bed bug problem since bites from ticks, fleas and mosquitoes can resemble bed bug bites. The only way to know for sure is to find and identify the bugs.

Look for:

- Small reddish brown bugs the size of an apple seed
- Small blood stains or dark excreta spots
- Dead bed bugs, shed skins or small whitish eggs
- A sweet or musty odor in the room

A thorough inspection is mandatory. Bed bugs are very good hidiers, so be sure to look in such places as listed below. Note that these are inspection sites and not a list of sites to be treated with this product.

- mattresses & box springs – around seams, creases, tufts, buttons, folds, vent holes & indentations
- bed frames – take apart bed frame to inspect cracks and crevices
- bedding & linens
- headboards & footboards
- nightstand & dresser drawers
- storage boxes, including those under beds
- furniture & upholstered furniture cushions
- pull out couches & sofa beds
- curtains & curtain rods
- rugs & tapestries
- cribs & changing tables
- chairs
- luggage & folding luggage racks
- wooden hangers
- clothing
- shoes & shoe boxes
- picture frames & wall hangings
- loose wallpaper or paneling
- wall voids & outlets – behind switchplates
- electrical boxes
- baseboards & floorboards
- carpeting & carpet tack strip
- crown molding
- door & window casings
- files, papers, books & magazines
- smoke detectors, thermostats, alarm clocks, telephones, radios and other electronics
- stuffed animals and plush toys
- pet carriers

Be thorough! Any little crack or crevice can be a bed bug hiding place.

Bed bugs prefer to stay close to their food source (you!) and are typically found within 1-5 feet of sleeping areas and furniture that is frequently occupied.

Detection devices [such as interceptors] [coasters] that are placed anywhere in the room, including under the legs of beds, couches or other furniture, or sticky glue traps can be used to monitor for bed bug activity. You may not notice any bed bug activity for 7-14 days and, even then, monitors will not detect 100% of the time. However, they can provide a barrier between the floor and bed and can be a very useful as part of an integrated pest management program.

Treatment

Bed bugs are challenging to eliminate because they can hide in many different places. Once detected, several steps must be taken to treat properly. Inspections must be thorough and elimination, especially of eggs, is not always a certainty. Treating for bed bugs is not the same as treating for other insects such as roaches and ants. Baits typically used to treat for roaches or ants are ineffective because bed bugs must bite and feed on blood. As a result, multiple treatments and treatment steps over several weeks as part of an integrated pest management program are necessary. Non-chemical and chemical options include:

- **Declutter:** Eliminate all clutter where bed bugs can hide. It is clutter, not uncleanliness, that puts you at risk for a bed bug infestation.
- **Vacuum:** Vacuum the entire area thoroughly, including the underside of the mattress, box spring and furniture, as well as the carpets and floor. Disassemble the bed and vacuum all bed components. Bed bugs and especially their eggs can be difficult to dislodge so use the vacuum's suction wand or crevice tool to scrape the infested area. Immediately discard the vacuum contents into a tightly sealed trash bag. Vacuuming every 2-3 days for 14 days is recommended.
- **Heat Treat:** Dry-wash-dry. First place clothing, bedding, etc. in the dryer for at least 45 minutes at a high temperature (120-140° F). Then, wash and dry all clothing, bedding, etc. at high temperatures (120-140° F). Be careful while stripping the bed so as to not dislodge bed bugs or eggs. Seal in a plastic bag before laundering to avoid spreading bed bugs and again after laundering in a new, clean plastic bag while you finish the treatment process so as to prevent reinfestation. Place toys, shoes, backpacks, etc. in a clothes dryer set at medium to high heat for 10-20 minutes. Wrap items that cannot be put in a washer or dryer in a large plastic bag and place them outdoors in a hot, sunny location or closed vehicle for at least a day. The fewer items packed in each bag, the better. Monitor with a thermometer for a target temperature of at least 120°F. Dry cleaning will have the same effect.
- **Apply Insecticides:** One step in eliminating bed bugs is to carefully apply insecticides registered to treat bed bugs [and bed bug eggs] to all areas where bed bugs are detected. Controlling bed bugs using non-chemical means alone is often very difficult, potentially less effective and usually more time consuming.
 - Carefully read and follow label directions.
 - Allow product to dry completely.
 - Do not sleep directly on treated mattress.
 - We recommend carefully inspecting the area and reapplying insecticides after 2 weeks to kill bed bugs that later hatch from eggs, along with those that were missed during earlier treatment.
- **Cracks & Crevices:** Use an aerosol to treat the cracks and crevices of the bed frame, mattress & box springs, luggage and other hard to reach places, contacting as many of the insects as possible. A dust is best in electrical outlets, wall voids, carpet tack strips and bed frames.
- **Spot Treatment:** Use a liquid insecticide for spot treatment of the mattress, box spring & bed frame, baseboards, carpet & tack strips and luggage, contacting as many insects as possible.
- **Area Treatment:** Use a fogger for larger areas or heavy infestations.
- **Barrier Treatment:** Use a dust to create a barrier around your baseboards, wall voids, electrical outlets and other entrance points.
- **Mattress & Household Items:** To treat the mattress, box spring, furniture and other large household items that cannot be washed, a [household item] [mattress and luggage treatment kit] containing a large sealable plastic bag and bed bug pest strip can be used.

- **Dispose Infested Items:** For items that cannot be treated by vacuuming, heat, laundering or insecticides, tightly wrap and seal in a large plastic bag prior to disposing. Destroy or mark “Infested with Bed Bugs” to prevent someone else from picking them up.

If after one month you are still experiencing a severe bed bug infestation, please contact your local professional pest management company.

Prevention

Proper steps must be taken to prevent an initial or reinfestation. These include:

- **Isolating & Encasing the Bed:** Move your bed and other furniture away from the wall slightly. Remember, bed bugs do not fly or jump! Making sure the bed skirt and blanket do not touch the floor will make it harder for bed bugs to crawl onto the bed. Place detection devices such as interceptors [coasters] or glue traps under or around the bed. Enclose mattress and box spring in encasements to prevent bed bug entry and exit. Do not remove encasements. Use light-colored bedding to help aid in spotting bed bugs.
- **Sealing Cracks & Crevices:** Seal openings in window sills, baseboards, floorboards, furniture, bed frames and where pipes or wires or other utilities enter the home. Fix or take down any peeling wall paper. Tighten loose switch covers. Installing door sweeps will help discourage movement into hallways. For extra protection, dust can be puffed into all cracks and crevices that are difficult to reach or can't be sealed such as electrical outlets, wall voids, carpet tack strips and bed frames. As long as the dust is present, it will remain effective and keep killing bed bugs. Be sure to carefully read and follow label directions .
- **Manage the Environment:** Eliminate clutter. Launder bedding and clean furniture routinely. Vacuum often and thoroughly. Thoroughly inspect purchased furniture before bringing it home, especially if it was purchased used. Avoid purchasing used furniture. Monitor previously infested or likely to be infested sites daily. Remove evidence of previous infestations. Restart treatment process if necessary.

Bed bugs are typically transported from place to place as people travel, so it is important to take proper precautionary steps when traveling. Also make sure any visiting guests are not transporting bed bugs in their luggage.

- **Prior to Travel:**
 - DO Spray luggage and allow to dry completely with a product registered to treat bed bugs [and bed bug eggs] and for use on luggage.
 - DO Pack clothing and other items in sealable plastic bags. Bring extra resealable plastic bags for soiled clothing.
- **At Hotel/Destination:**
 - DO check for [signs of bed bugs](#) by examining the cracks and crevices of the mattress, box spring, sheets, bedding, headboard, nightstand & dresser drawers, desks, chairs, and other furniture; behind wallpaper and pictures; in clocks and other electronics; in cracks in wood floors; and under the edge of the carpet. Carrying a small flashlight such as the [insert product name here] will help you quickly and thoroughly inspect for signs.
 - DO change rooms immediately, or change hotels entirely, if you identify bed bugs in your hotel room.
 - DO NOT put your suitcase on the bed. Elevate all luggage off the floor using a luggage rack (inspect first), tabletop or other hard surface. The best place is in the bathroom, especially the tub.
 - DO NOT unpack your suitcase contents into dressers.
 - DO check clothes hangers thoroughly before unpacking. Bed bugs hide in the cracks and crevices of hangers so a thorough inspection is necessary before hanging up clothes, especially if the hangers are wooden.
 - DO re-pack luggage contents into sealable plastic bags so you can throw them directly in the dryer when you return home to kill any bed bugs or eggs that may be nestled in the clothing.
- **Returning Home:**
 - DO NOT unpack luggage inside. Unpack luggage outside, or in a garage, laundry room or utility room.
 - DO remove the items you placed in plastic bags at the hotel, and throw them immediately into the dryer, set on the highest heat setting the fabric can withstand to kill any bed bugs or their offspring that may be nestled in the items.
 - DO inspect luggage and clothing for signs of bed bug activity. If signs are found, treat luggage by vacuuming, laundering (scrubbing with hot, soapy water) and/or insecticides.
 - DO store luggage in sealed bags and keep them in a closet or garage. If you are exposed to a bed bug infestation, there is no reason to throw out your luggage and clothing unless your infestation is severe. The key is to contain all items suspected of carrying bed bugs in plastic bags until you can treat them.

These steps are very important, and must be done carefully, consistently and cyclically. Bed bugs are resilient creatures that will not go away without intervention.

A comprehensive, continuous cycle of Detection → Treatment → Prevention is the key to gaining control.