'8FEB 1995

Mr. John T. Brogan IQ Products Company 16212 Stat Highway 249 Houston, TX 77086

Dear Mr. Brogan:

Subject: Label Amendment

CSA Aerosol Insecticide Formuls Seven

EPA Registration Number 7056-180 Application Dated August 8, 1994

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comment listed below.

- Under the Directions for Use, "For Wasps, Hornets, Yellow Jackets, and Bees please clarify what is meant by "encapsulating foam". This statement implies that a change in the formulation process has been made. Please reply to this change within 60-days of receipt of this letter.
- Modify the Environmental Hazard Statement, (Do not apply directly to water or wetlands...marshes), to read: Do not apply to water. Refer to PR Notices 93-3 and 93-8 for further guidance.

A stamped copy of the label is enclosed/or your records.

Sincerely,

Rebbeca S. Cool

Acting Product Manager 10 Insecticid and Rodenticide Branch

Registration Division (7505C)

ČSA AEROSOL INSECTICIDE FORMULA SEVEN

FOR HOUSE AND GARDEN

New Patent Pending Water-Based Technology Fresh, Clean Scent

ACTIVE INGREDIENTS:

Resmethrin (5-(phenylmethyl)-3-furanyl methyl 2,2-dimethyl-3-(2-methyl-1-propenyl)

*cis/trans isomers ratio:

max. 30%(±) cis min. 70%(±) trans

KEEP OUT OF REACH OF CHILDREN CAUTION

Read carefully other cautions on the back panel.

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN CLOTHING: Remove contaminated clothing. Wash skin with soap and water. Get medical attention if irritation persists.

IF SWALLOWED: IF IN EYES: Call a physician or poison control center.

Flush with plenty of water. Get medical attention if

imitation persists.

IF INHALED:

Remove affected person to fresh air. Call a physician if adverse reactions occur.

NET WEIGHT: 14 oz. (397g)

Manufactured by: IQ PRODUCTS COMPANY HOUSTON, TEXAS 77086

EPA REG. NO. 7056-180

EPA EST. NO. 7056-TX-1



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin and eyes. Wash hands thoroughly with soap and water after use.

Do not apply directly to food. Cover or remove any food and food preparation equipment, surfaces, and utensits during application or thoroughly wash before use. Do not apply white food is being prepared.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water or wetlands (i.e. potholes, swamps, bogs, and mershes). Drift and runoff from treated sites may be hazardous to fish in adjacent waters. Do not contaminate water when disposing of equipment wash water.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store neer heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause container to burst. Do not apply this water-based product in conduits, motor housings, junction and switch boxes, or other electrical equipment because of possible shock hazards. Do not use on surfaces that may be damaged by water.

DIRECTIONS FOR USE

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

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT. SHAKE CONTAINER WELL BEFORE USE. HOLD CONTAINER UPRIGHT DURING USE.

For use in and around hotels; motels; homes; greenhouses; food handling establishments; peckaging and processing plants; seed houses; commercial, industrial, office, institutional, and storage buildings; milk handling areas of milk, cheese, and ice cream plants; milk storage rooms; egg processing plants; supermarkets; restaurants; bottling plants; canneries; flour and feed mills; betienes; boats and ship cabins; and hospitals. In hospitals, patients should be removed from area prior to spraying. Ventilate area for two hours before allowing patients to return. Also for use in buses, automobiles, trucks, boxcars, and ship cargo holds. Also for use in dog kennets and horse stables. Not for use in horse stables if horses will be used for food.

NDC:ORS

FOR HOUSE FLIES, MOSQUITOES, GNATS, FLYING MOTHS (Millers), FRUIT FIJES, AND VINEGAR FLIES: Close all doors and windows. Point nozzle upward and direct spray mist to all parts of the room, especially windows and other light sources. Fill the room with mist, then leave room. Keep room closed for at least 15 minutes. Ventilate room when treatment is completed.

FOR COCKROACHES (Waterbugs), EARWIGS, GRAIN MITES, SOWBUGS (Pillbugs), SILVERFISH (Firebrats), SPIDERS, CENTIPEDES, MILLIPEDES, FLEAS, ANTS, BOOKLICE, AND CRICKETS: Spray thoroughly and frequently into hiding places such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards, door frames, bookcases, and storage areas. Spray directly on insects where possible. FOR ANTS, INCLUDING FIRE ANTS: Also spray ant trails, nests, and around doors, window frames, and other points of entry. Repeat as necessary.

FOR BEDBUGS AND LICE: Apply as a spot treatment to cracke and convoces around baseboards, floorboards, bud boards, and walke. First, thoroughly clean and ar mattress and box springs. Then spot treat only areas that may harbor pasts, concentrating on tufts, folds, and seams. Repeat as necessarys for persetent infestations consult professional application.

FOR FLEAS AND TICKS ON DOGS, CATS, AND PREMISES: Hold nozzle 8-12 inches away while spraying. Apply directly to animals along back, under forelegs, and on other areas except face, scrotum, and anus. Fluff hair so the spray directly in eyes or mouth of animal. Repeat within 24 hours of first treatment, if necessary. To reduce reinfestation, thoroughly spray animal's bedding and other resting areas until the surface is slightly moist. Treat these areas at the rate of two seconds per linear foot at a distance of 12-18 inches. Also spray the entire inside surface of dog houses. Repeat as necessary, thoroughly spraying floors, cracks, srevices, and bedding. Spray as many insects as possible.

TO PROTECT HOUSE PLANTS: Spray infested African violets, philodendron, begonias, geraniums, and coleus for control of aphids, exposed thrips, adult whiteffee, spider mites, and fungus gnats. Use with caution. To determine possible toxicity to plants, spray only a few plants, wast 24 hours, and check for possible injury. Repeat as necessary.

FOR PROTECTION OF WOOLENS: Dry clean or wash garments and blankets before treating. Spray garments, blankets, carpets, and other woolen fabrics before placing in storage for protection from larvae of webbing clothing moths, and black carpet beetles. Clean carpets, draperies, and other fabrics by thoroughly brushing before treating. Hold container 14-18 inches from fabric and spray evenly in a sweeping motion across the fabric at the rate of one foot per second. Spray the entire fabric surface until it is slightly most or damp to the touch. Do not saturate fabric. When possible, treat both sides of the fabric. For mum protection, store dry, treated fabrics in tightly seeled containers. Spray arms rate of two seconds per linear foot to treat cracks and crevices of closets, chests, and trunks where fabrics are stored.

When applied as directed on fabric and in storage areas, this treatment will offer protection for six months. To assure protection, inspect fabric in storage every three months. Repeat application only when necessary. When possible, make application outdoors. If application is made indoors, provide adequate ventilation while treating fabric. When application is complete, leave area and allow to ventilate completely.

OUTDOORS

FOR FLYING INSECTS: Spray areas infested with mosquitoes, gnats (midges), house lies, stable fies, deerfies, and flying moths (millers). Follow precautions listed above. Hold container 18 to 24 inches from shrubs, bushes, and grassy areas. Spray with a slow sweeping motion at the rate of one to three seconds per cubic yard. To reduce annoyance from these flying insects, treet open porches and patios in a similar manner. Do not spray in windy conditions. Avoid contact with insecticide overspray and allow spray to dissipate before occupying the treeted area. Repeat as necessary.

TO PROTECT ORNAMENTAL PLANTS: To control aphids, exposed thrips, adult white flies, leafhoppers, gypsy moths, plant bugs, spittlebugs, and Jepanese beetles on smaller rhododendrons, pine, spruce, hemlock, spires, dogwood, palm, mimosa, toyan, vibumum (honeysuckle), euonymus (spindle tree), oak, maple, locust, forsythia, and altheir, and mimosa webworm lanvae on mimosa, spray directly on insects. Hold container 18 inches from the infested plants. Spray in short bursts of one to three seconds or spray at the rate of one linear foot of growth per second. Spray all sides of foliage until slightly moist. Avoid heavy welting. Repeat as necessary.

Spray peonies, iris, zinnie snepdragone, ageratums, chrysanthemums, nesturtiums, daisies, geraniums, mengolds, daphne, fatshedera, rvies, tobra, queen sago, and broed leaf acacia for control of aphide, exposed thrips, adult whitefies, leathoppers, plant bugs, spittlebugs, and Japanese beetles. Spray as directed above

Omemental quince, juniper, cypress, omemental multierry, ash, cotonessier, rose, camellia, azalea, pyracantha, and csenothus may also be treated to control the above pasts, but use with extreme caution. Certain varieties have shown some leef burn under certain conditions, such as heavy dosage. Repeat as necessary.

FOR TENT CATERPILLARS: Application should be made when caterpitlars are young and tents are first noticed (usually late spring). For best results, apply in the late afternoon or evening when caterpitlars have returned to their tents. Aim spray directly at tents, and completely saturate on all sides. Repeat as necessary.

FOR GYPSY MOTH CATERPILLARS: Application should be made when caterpitars are young and first noticed (usually late spring). Spray plants evenly on both sides of leaves and other areas of plants where insects are suspected. For dense evergreens and shrubs, be sure spray reaches interior leaves and branches.

FOR CRICKETS, SILVERFISH, EARWIGS, SOWBLGS, CENTIPEDES, AND MILLIPEDES: Same as directed above for indoor use.

FOR ANTS: Spray trails, neets, hills, and points of entry. Spray directly on ants where possible. Repeat as necessary.

FOR FIRE ANTS: Kills and temporarily reduces annoyance of these insects. To reduce annoyance from these arts and keep them from entering homes, spray patios, barbacue areas, driveways, door sills, window sills, other entrance areas, foundations of buildings, ant trails, around pools, and areas where they are noticed. Spray until the area is wet, contacting as many insects as possible. This treatment will not kill the colonies, but will reduce the immediate population for up to four hours. Repeat as necessary.

FOR FLEAS AND TICKS: Same as directed for indoor use.

SPIDERS (including black widow and brown recluse): Spray in short bursts directly on spiders. Repeat as necessary.

FOR WASPS, HORNETS, YELLOW JACKETS, AND BEES: This encapsulating form can effectively reach up to 12 feet. Application should be made in late evening when insects are at rest. Do not sprey into the wind. Aim nozzle at the nest and depress actuator until nest is encased in form. This form prevents waspe and other pests from flying away white the ingredients act to full these unwented pests. Repeat as necessary.

STORAGE AND DISPOSAL

Storage:

Keep in locked storage area. Store in a cool dry place, away

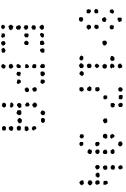
from heat, sparks, and open flame. Do not store at

temperatures over 130°F.

Disposal:

Dr. It reuse empty container. Replace cap and discard in acuil dance with all local, state, and federal laws and

regulations. Reduce pollution at its source



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