

06 APR 1995

Marty A. York
IQ Products Company
16212 State HWY 249
Houston, TX 77086

Dear Mr. York:

Subject: Label Amendment
CSA Aerosol Insecticide Formula Seven
EPA Reg. No. 7056-180
Submission Dated March 28, 1995

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 comments listed below.

In the Environmental Hazards section of the label, delete the sentence, "Refer to PR Notices 93-3 and 93-8 for further guidance." These PR Notices discuss EPA's policy concerning labeling statements prohibiting applications of pesticide products to water. The notices apply only to manufacturers, formulators, producers and registrants of pesticide products, not to pesticide users. The Agency's February 8, 1995, letter to you included this sentence to draw your attention to these guidance documents. However, EPA did not intend for you to include this sentence on the final product labeling. I apologize for any confusion.

Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

If you have any questions or comments, please contact me at (703) 305-6876.

Sincerely yours,

/s/

Richard P. Keigwin, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division

CSA AEROSOL INSECTICIDE
FORMULA SEVEN

FOR HOUSE AND GARDEN

New Patent Pending Water-Based Technology
Fresh, Clean Scent

ACTIVE INGREDIENTS:

Permethrin [5-(phenylmethyl)-3-furyl
methyl 2,2-dimethyl-3-(2-methyl-1-propenyl)
cyclopropanecarboxylate] 0.25%

INERT INGREDIENTS: 99.75%
100.00%

*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

- SKIN OR CLOTHING: Remove contaminated clothing. Wash skin with soap and water. Get medical attention if irritation persists.
- IF SWALLOWED: Call a physician or poison control center.
- IF IN EYES: Flush with plenty of water. Get medical attention if irritation 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

ACCEPTED
with COMMENTS
in EPA Letter Dated
06 APR 1995

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

7056-180

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 utensils during application or thoroughly wash before use. Do not apply while food is being prepared.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply directly to water. Refer to PR Notices 93-3 and 93-6 for further guidance. 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 near 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.

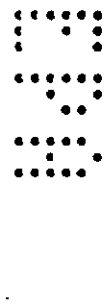
For use in and around hotels; motels; homes; greenhouses; food handling establishments; packaging and processing plants; seed houses; commercial, industrial, office, institutional, and storage buildings; milk handling areas of milk, cheese, and ice cream plants; milk storage rooms; egg processing plants; supermarkets; restaurants; bottling plants; canneries; flour and feed mills; bakeries; 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 kennels and horse stables. Not for use in horse stables if horses will be used for food.

INDOORS

FOR HOUSE FLIES, MOSQUITOES, GNATS, FLYING MOTHS (Millers), FRUIT FLIES, 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 cracks and crevices around baseboards, floorboards, bed boards, and walls. First, thoroughly clean and air mattress and box springs. Then spot treat only areas that may harbor pests, concentrating on tufts, folds, and seams. Repeat as necessary. For persistent infestations consult professional applicator.



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 will penetrate to the skin. Apply until hair is thoroughly moist. Do not 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, crevices, 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 whiteflies, spider mites, and fungus gnats. Use with caution. To determine possible toxicity to plants, spray only a few plants, wait 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 moist or damp to the touch. Do not saturate fabric. When possible, treat both sides of the fabric. For maximum protection, store dry, treated fabrics in tightly sealed containers. Spray at the 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 flies, stable flies, deerflies, 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, treat 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 treated area. Repeat as necessary.

TO PROTECT ORNAMENTAL PLANTS: To control aphids, exposed thrips, adult white flies, leafhoppers, gypsy moths, plant bugs, spittlebugs, and Japanese beetles on smaller rhododendrons, pine, spruce, hemlock, spirea, dogwood, palm, mimosa, toyon, viburnum (honeysuckle), euonymus (spindle tree), oak, maple, locust, forsythia, and alibea, and mimosa webworm larvae 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 wetting. Repeat as necessary.

Spray peonies, iris, zinnia, snapdragons, ageratums, chrysanthemums, nasturtiums, daisies, geraniums, marigolds, daphne, litchidera, lilies, tobira, queen sago, and broad leaf acacia for control of aphids, exposed thrips, adult whiteflies, leafhoppers, plant bugs, spittlebugs, and Japanese beetles. Spray as directed above.

Ornamental quince, juniper, cypress, ornamental mulberry, ash, cotoneaster, rose, camellia, azalea, pyracantha, and caenothus may also be treated to control the above pests, but use with extreme caution. Certain varieties have shown

some leaf burn under certain conditions, such as heavy dosage. Repeat as necessary.

FOR TENT CATERPILLARS: Application should be made when caterpillars are young and tents are first noticed (usually late spring). For best results, apply in the late afternoon or evening when caterpillars 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 caterpillars 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, SOWBUGS, CENTIPEDES, AND MILLIPEDES: Same as directed above for indoor use.

FOR ANTS: Spray trails, nests, 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 ants and keep them from entering homes, spray patios, barbecue 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.

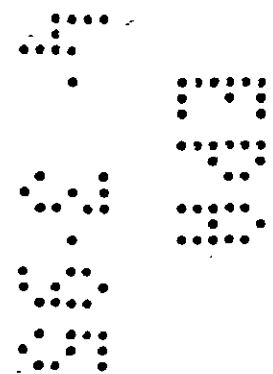
FOR FLEAS AND TICKS: Same as directed for indoor use.

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 foam can effectively reach up to 12 feet. Application should be made in late evening when insects are at rest. Do not spray into the wind. Aim nozzle at the nest and depress actuator until nest is encased in foam. This foam prevents wasps and other pests from flying away while the ingredients act to kill these unwanted 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:** Do not reuse empty container. Replace cap and discard in accordance with all local, state, and federal laws and regulations. Reduce pollution at its source.



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