

Mr. Troy Munson
Athea Laboratories, Inc.
P.O. Box 240014
Milwaukee, WI 53224

Subject: Revised Labeling PR Notice 2001-1
and PR Notice 2001-6
Contact Insecticide
EPA Reg. Number: 10088-96
Application Dated: August 18, 2003

Dear Mr. Munson:

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:

(1) In accordance with PR Notice 2001-6 revise your disposal statement to read:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or [toll free number which meets the criteria in paragraph IIE.] for disposal instructions. Never place unused product down any indoor or outdoor drain.

(2) It is the Agency's view that terms, such as "natural", are misleading health and safety claims and therefore constitute misbranding under section 2(q)(1)(A) of FIFRA. Therefore, the use of "Natural" and other similar claims is not permitted for any product registered under FIFRA.

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A stamped copy of the label is enclosed. Submit three copies of revised final printed labeling prior to releasing product for shipment.

Sincerely,



Linda Arrington
Acting, Product Manager 10
Insecticide Branch
Registration Division (7505c)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contamination of feed and foodstuffs. Remove pets, birds and cover fish aquaria before space spraying or surface applications.

FIRST AID

IF SWALLOWED: 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF INHALED: 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 further treatment advice.

IF ON SKIN OR CLOTHING: 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: 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

For information on product, usage, etc., call 1-800-xxx-xxxx.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. For terrestrial use, 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 by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

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

GENERAL USE DIRECTIONS

INDOOR APPLICATION:

The use of this product in food processing establishments should be confined to time periods when the plant is not in operation. Food should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly washed with an effective cleaning compound followed by a potable water rinse before using.

Vacate treated areas and ventilate before reoccupying.

CONTACT INSECTICIDE

- CLEAR-STABLE - LEAVES NO OILY RESIDUES
- WATER-BASED, FAST ACTING INSECTICIDE
- KILLS AND REPELS BITING FLIES
- FOR USE IN INSTITUTIONS, RESTAURANTS, FOOD PROCESSING PLANTS, DAIRIES, LIVESTOCK AND OUTDOORS
- FOR CONTROL OF FLEAS AND BROWN DOG TICKS ON PREMISES AND ON PETS
- KILLS CRAWLING AND FLYING INSECTS ON CONTACT
- CONTAINS NATURAL [PYRETHRIN] [INSECTICIDE] DERIVED FROM FLOWERS

ACTIVE INGREDIENTS:

Pyrethrins 0.10%
* Piperonyl Butoxide, Technical 1.00%

INERT INGREDIENTS: 98.90%
TOTAL 100.00%

* Equivalent to min. 0.8% (butylcarbityl)(6-propylpiperonyl) ether and 0.2% related compounds.

KEEP OUT OF REACH OF CHILDREN CAUTION

See side panel for first aid instructions and additional precautionary statements.

EPA Reg. No. 10088-96

EPA Est. No. 10088-WI-1

NET CONTENTS: 1 5 6 20 30 35 55 Gallons

Manufactured By:

Athea Laboratories Inc.

P. O. Box 240014

Milwaukee, WI 53224

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

NOV 28 2003

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
E-10088-96**

For maximum effectiveness, a combination of spot, surface treatment and fogging is recommended.

SURFACE SPRAYING: To control *Cockroaches, Palmetto Bugs, Ants, Silverfish, Spiders, Crickets, Clovermiles, Cheese Mites, Earwigs, Sowbugs, Boxelder Bugs, Centipedes, Granary Weevils, Rice Weevils, Confused Flour Beetles, Rust Red Flour Beetles, Sawtoothed Grain Beetles, Spider Beetles, Cigarette Beetles, Drugstore Beetles, Meal Worms, Grain Mites and Cadelles:* Use a good sprayer adjusted to a coarse wet spray. Direct the spray into hiding places, cracks and crevices, under pallets, around containers of stored foods, around the base of machinery, behind shelves and drawers, behind and beneath sinks, stoves, refrigerators and cabinets, along baseboards, around door and window frames, into dark corners and in and around garbage compactors, garbage chutes and cans. For *Silverfish*, spray bookcases. For *Ants*, spray trails, nests and points of entry. If surface application only is to be used, spray floors and other surfaces applying at a rate of 1 gallon to 750 square feet of surface.

In case of infested foods in cabinets, dispose of the infested material. Remove all contents and clean thoroughly. Spray interior surfaces of empty cabinets thoroughly. After spray has dried, cover shelves with paper or otherwise protect foods from direct contact with sprayed surfaces.

TO CONTROL CARPET BEETLES: Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving. Repeat treatment as needed.

TO CONTROL BEDBUGS: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as needed.

TO CONTROL CLOTHES MOTHS: Remove any infested articles from storage, brush thoroughly and air for several hours in sunlight, if possible. Apply spray liberally to empty chests, closets, bureaus and other storages directing the spray into cracks, joints and crevices. After airing, infested articles may be treated lightly keeping nozzle at least three feet from fabric to avoid staining.

SPACE SPRAYING: Close doors, windows and transoms and shut off ventilating systems. Apply with a good machine adjusted to deliver a fine mist or fog. For rapid control of *House Flies, Fruit Flies, Gnats, Mosquitoes, Skipper Flies, Wasps, Hornets, Angoumois Grain Moths, Mediterranean Flour Moths, Indianmeal Moths and Tobacco Moths*, direct spray at an upward angle distributing it uniformly throughout the entire area at a rate of 3-6 ounces per 1000 cubic feet of space. Do not remain in treated areas. If insects have not dropped to floor in 3 minutes, repeat spraying as quantity sprayed was insufficient. Ventilate the area after treatment is completed. To aid in the prevention of breeding, spray on standing water and in garbage pails.

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FOGGING: To kill exposed or accessible stages of the above named crawling insects, use a rate of 1 gallon to 20,000 to 40,000 cubic feet of space. Contact insects directly whenever possible.

ON LIVESTOCK: To protect cattle, horses and hogs from *Horn Flies*, *House Flies*, *Mosquitoes* and *Gnats* apply a light mist sufficient to wet the surface of the hair.

TO CONTROL STABLE FLIES, HORSE FLIES AND DEER FLIES, apply at a rate of 2 ounces per adult animal sufficient to wet the hair thoroughly. Repeat treatment daily or at intervals necessary to give continued protection.

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 2 to 3 weeks if required.

TO CONTROL POULTRY LICE, spray roost, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

FOR CONTROL OF BEDBUGS AND MITES in poultry houses, spray crevices of roost poles, cracks in walls, and cracks in nests where bedbugs and mites hide.

ADULT MOSQUITO CONTROL: Apply as a fine mist to thoroughly treat the entire area. For best results, treat when the wind velocity does not exceed 5 miles per hour. Treat shrubbery or vegetation where *Mosquitoes* may rest (low, marshy places, stagnant pools or ponds and shore lines). Apply at a rate of 2.5 pints per acre (0.1 ounce per 100 square feet). Using truck-mounted conventional misting equipment such as Rotomist® models 51C, 91 or 100HT traveling at 5 m.p.h. to treat a 300 foot swath calibrate equipment to deliver 0.9 gallon per minute.

OUTDOORS: (Camping, fishing, hunting) - Spray outer clothing and surroundings. Repels *Biting Flies*, *Mosquitoes*, *Midges* and *Gnats*. If sprayed every hour or so, will aid in keeping surroundings free from *Mosquitoes*. If in rare cases skin irritation results, avoid continued contact. Do not pour or squirt - use a good sprayer which will throw a heavy fine mist.

GARDEN INSECTS ON HOUSE PLANTS AND ORNAMENTAL PLANTS OUTDOORS: Direct spray so that upper and lower leaf surfaces are contacted. To control *Aphids*, *Bagworms*, *Thrips*, *Flea Beetles*, *Japanese Beetles*, *Leaf Bugs*, *Leaf Hoppers*, *Leafhoppers*, *Mimosa Webworm Larvae*, *Plant Bugs* and *Whiteflies* use a fine mist spray about 18 to 24 inches from infested plants. Use caution on new growth and tender foliage. Repeat treatment as necessary. Avoid spraying plants when temperature exceeds 85°F. Spray when air is still. Avoid heavy wetting.

FLEAS AND TICKS ON DOGS AND CATS: Start spraying at the animal's head, avoiding the eyes, nose and mouth as you spray. Make sure the animal's entire body is covered including the legs, under-body and tail. While spraying, fluff the hair so that the spray will penetrate the skin. Make sure spray wets thoroughly. Avoid contact with genitalia. Repeat as necessary.

PET AREAS: To control *Fleas* and *Brown Dog Ticks* on premises: Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames, and entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. Concurrent treatment of animals is recommended. Repeat treatment as needed.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

STORAGE AND DISPOSAL

CONTAINERS LARGER THAN ONE GALLON:

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

Pesticide Storage and Spill Procedures: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste. Protect from freezing.

Pesticide Disposal: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other approved State and local procedures.

CONTAINERS ONE GALLON OR LESS:

Storage: Store in original container in a cool, dry place inaccessible to children and pets. Protect from freezing.

Disposal: Wrap container in several layers of newspaper and discard in trash.

TRIGGER SPRAYERS ONE GALLON OR LESS:

Storage: Turn sprayer to off position and store in a cool place.

Disposal: Do not reuse empty container. Wrap container and put in trash for collection.

0847.081503

ALTERNATIVE FRONT PANEL PLUGS FOR CONSUMER LABELING

- LEAVES NO [LINGERING] [OBJECTIONABLE] [INSECTICIDE] ODOR
- LEAVES NO OBJECTIONABLE OILY OR STICKY RESIDUE
- FOR CONTROL OF FLEAS AND BROWN DOG TICKS
- FOR USE ON PETS
- CAN BE USED ON PETS
- KILLS AND REPELS [BITING] FLIES
- EFFECTIVE
- WORKS FAST
- FAST ACTING
- LEAVES NO OILY STAINS
- [LEAVES] NO STICKY MESS
- UNSCENTED
- NON-AEROSOL
- EASY TO USE TRIGGER PUMP
- CONVENIENT TRIGGER PUMP
- NO AEROSOL FUMES
- KILLS WITH PYRETHRIN [INSECTICIDE]
- PYRETHRIN [INSECTICIDE] IS MADE FROM FLOWERS
- FOR USE ON PLANTS AND SHRUBS

BRACKETS "[]" DENOTE OPTIONAL COPY