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Mr. George E. Pipkin
Qualis, Inc.
4600 Park Ave.
Des Moines, IO 50321

Dear Mr. Pipkin:

Subject: Amendment - Label Revision
General Purpose Residual Spray Insecticide
EPA Registration No. 34797-64
Your Letter Dated January 30, 1990

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Delete "General Purpose" from the product name. The phrase "General Purposes" implies that the product is not limited in scope or application. This is misleading since the product is limited regarding who applies it, where its applied and how its applied. We regret this was overlooked in our initial review.
2. Under the Indoor Application section, add or revise the following statements:
 - a. Add: Do not apply to classrooms when in use.
 - b. Add: Do not apply to institutions (including libraries, sports facilities, etc) in the immediate area when occupants are present.
 - c. Revise: 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 food are served such as dining rooms but excluding areas where foods may be prepared or held. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning and bottling).

3. Under "carpet beetles", "bedbugs", "fleas and ticks", and "clothes moths" add the statement "Allow all treated articles to thoroughly dry before use."
4. Under "adult mosquito control" add the statement "Not to be used within 100 feet (30 meters) of lakes, streams or wetlands." before "Apply at a rate...".
5. The Environmental Hazards section does not include any statements regarding bees or cautions about spray drift or runoff. The Environmental Hazards statements should be changed to:

The pesticide is highly toxic to fish. Do not apply directly to water or wetlands, (swamps, bogs, marshes and potholes). Drift and runoff from treated areas may be hazardous to aquatic organisms in treated areas. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

6. Delete under adult mosquito control directions, "(low, marshy places, stagnant pools or ponds and shorelines)", since these sites are unacceptable and conflict with comment 5.
7. Under the directions for pets add, "Do not use on old, sick or debilitated pets".
8. On front and side panels, change pets to Dogs and Cats.
9. Use in food handling establishments can imply use in U.S. Department of Agriculture (USDA) Meat and Poultry Plants. Therefore, either add the statement "Not for Use in USDA Meat and Poultry Plants," or submit an application to USDA requesting use in these areas. If granted, you can then indicate on the label that the product can be used in these areas.

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Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (H7505C)

PROPOSED LABEL COPY

Product Name:	Dionne General Purpose Residual Spray Insecticide	Label Dimensions
Formulation/ Product Number:		Height: Width:
Authored by:		Paper Type:
Reviewed by:		Paper Weight:

GENERAL PURPOSE RESIDUAL SPRAY INSECTICIDE

Recommended for Agricultural/Commercial Use and Mosquito Abatement District Officials.

A Stable Emulsion: Effective, Fast Acting Insecticide. For Use Outdoors In and Around the Home and Nonfood Areas of: Schools, Warehouses, Office Buildings, Apartment Buildings, Theatres, Hotels, Motels, Kennels, Food Processing Plants, Food Service Establishments, Food Manufacturing and Warehousing Establishments, and Restaurants.

For Control of Fleas, Brown Dog Ticks and Lice on Premises and on Pets.

Controls Fleas and Ticks on Dogs for 35 days. Also controls Ticks on Dogs for an Additional 2 weeks.

Apply with Conventional Mechanical or Compressed Air Equipment.

Active Ingredients:

*Permethrin	0.50%
INERT INGREDIENTS:	99.50%

* (3 Phenoxyphenyl) Methyl (±) cis/trans 3 (2,2 Dichloroethenyl) 2,2-Dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (±) cis and max. 65% (±) trans.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Rear Panel for Use Cautions
and Statement of Practical Treatment

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EPA Est. No. 34797-1A 03

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EPA Reg. No. 34797-64

DIRECTIONS FOR USE

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

SHAKE WELL BEFORE USE

INDOOR APPLICATION

Do not use in the edible product areas of food processing plants, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed.

Vacate treated areas and ventilate before reoccupying. For maximum effectiveness, a combination of spot, surface treatment and fogging is recommended.

For space spraying/fogging indoors, wear a NIOSH or MSHA approved respiratory protective device.

SURFACE SPRAYING: To control cockroaches, waterbugs, palmetto bugs, scorpions, millipedes, centipedes, sowbugs, pillbugs, ants, silverfish, firebrats, spiders, crickets, clover mites, cheese mite, 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 cadellies; 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, and behind shelves and drawers. For silverfish, spray bookcase. 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 one gallon to 750 square feet of surface.

To control carpet beetles: Spray edges of carpeting and under carpeting and rugs. Make localized applications 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, mouldings and floors. Repeat treatment as needed.

To control fleas and ticks (adult and larvae): Thoroughly spray infested areas, pet beds, resting quarter, nearby cracks and crevices, along and behind baseboards, mouldings, window and door frames, and entire areas of floor coverings. Fresh bedding should be placed in animal quarters following treatment. 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.

Handwritten notes: "Exposed", "Dry surface", "P. 2"

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To kill lice and louse eggs: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Spray from a distance of 5 to 10 inches. Treat only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all treated articles to dry thoroughly before use.

SPACE SPRAYING: Close doors and windows 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, bees, black flies, Angoumois grain moths, Mediterranean flour moths, Indian meal moths and tobacco moths: Direct spray at an upward angles, distributing it uniformly throughout the entire area at a rate of 1 ounce per 1000 cubic feet of space. Keep area closed for 2 hours. Ventilate before reoccupying.

FOGGING: To kill exposed or accessible stages of the above named crawling insect, use a rate of 1 gallon to 20,000 to 40,000 cubic feet of space. Contact insects directly when possible. Keep area closed for 2 hours. Ventilate before reoccupying.

ON LIVESTOCK: To protect cattle (beef and dairy), goats, sheep, hogs and horses from horn flies, face flies, house flies, mosquitoes, and gnats: Apply a light mist sufficient to wet the surface of the hair. For face flies, spray face and head, but do not spray into the eyes.

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 3 weeks if required.

To control poultry lice: Spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

To control bedbugs and mites in poultry houses: Spray crevices of roost poles, cracks in walls, and cracks in nests where the bedbugs and mites hide.

ON PETS: To control fleas, ticks and lice: Start spraying at the tail, moving the dispenser rapidly and making sure that the animal's entire body is covered, including the legs and underbody. While spraying, fluff the hair so that the spray will penetrate to the skin. Make sure spray wets thoroughly. Do not spray into eyes or face. Avoid contact with genitalia. Repeat as necessary.

NOTE: Not recommended for use on kittens or puppies less than four weeks old. For space/fogging indoors, wear a NIOSH or MSHA approved respiratory protection device.

OUTDOOR APPLICATION

FOR CONTROL OF GARDEN INSECTS: For use on roses, dahlias, asters and other ornamentals to kill Japanese beetles hit by spray as well as whiteflies, aphids, exposed thrips, spiders, redmites and leafminers.

May be used on plants, as a multi-purpose spray in small gardens and for spot treatments of incipient insect infestations to prevent spreading in large garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwoods, English ivy, eunonymus, fuschia, geraniums, crassula, grape vines, Kentia palms, laurels, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against whiteflies, aphids, spider, and red mites, exposed thrips, lace bugs, Japanese beetles, pavement ants, clever mites and army worms.

When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. Contact insects directly whenever possible. Repeat treatment as infestations occur.

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 five miles per hour. Treat shrubbery or vegetation where mosquitoes may rest (low, marshy places, stagnant pools, or ponds, and shorelines). Apply at a rate of 2.5 pints per acre (0.9 ounces per 1000 square feet). Using truck-mounted conventional misting equipment such as Rotomiste models 51 C, 91, or 100 HT traveling at 5 mile per hour to treat a 300 foot swath, calibrate equipment to deliver 0.95 gallon per minute. Under no conditions should open water be treated with this product. Do not allow spray to drift on pastureland, cropland, poultry ranges, or water supplies. Do not use on crops for food, forage, or pasture.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE AND SPILL PROCEDURES: Store upright at room temperature. Do not expose to freezing temperatures. 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.

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.

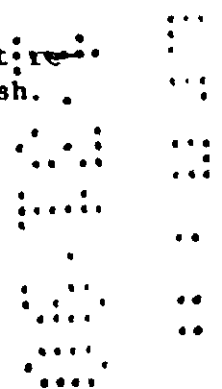
CONTAINER DISPOSAL: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.

CONTAINERS ONE GALLON AND SMALLER: Do not transport or store below 32°F. Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION



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Harmful if swallowed. May be absorbed through skin. Avoid inhalation of spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly after handling and before smoking or eating. Avoid contamination of feed or food stuffs. Remove pets and cover fish tanks before spraying. Do not allow children or pets to contact treated areas until surfaces are dry.

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STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink one to two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician immediately. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove affected person to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water by cleaning of equipment or disposal of wastes.

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Buyer assumes all risks of use, storage, or handling of this product not in strict accordance with directions give herewith.