UN ED STATES ENVIRONMENTAL F STECTION AGENCY

34797 -84

WASHINGTON, D.C. 20460

3/7/2002

MAR 7 2002

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Brian Mersch Qualis, Inc. 4600 Park Ave. Des Moines, IA 50321

Subject:

Amendment Revising Directions for Use Against Lice/Louse Eggs and Adding

Alternate Brand Name Label "Bedding Spray"

0.5% Permethrin Aerosol Spray

EPA Reg. No. 34797-84

Your Resubmission Dated January 29, 2002

Dear Mr. Mersch:

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 below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1. Correct the following typographical errors on the master label:
 - Delete the duplicate front panel claim "Controls Pests for up to Four Weeks."
 This claim is repeated twice.
 - In the section for Bedbugs, insert the word "and" between "mattress cover" and "sheet" in the third sentence. The corrected sentence should read: "After mattress is dry, cover with mattress cover <u>and</u> sheet." (Note: This same correction should be made to the "Bedding Spray" alternate brand name label.)
 - Correct the spelling of "Fleas" in the first column on page 3.

The alternate brand name "Bedding Spray" is acceptable. The "Bedding Spray" label you submitted is consistent with the master label, except that it is missing the heading "FIRST AID" above the First Aid table in the right-hand column. Please correct this error.

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely.

Sucar L. Staton for George T. LaRocca Product Manager (13)

Insecticide Branch

Registration Division (7505C)

Enclosure

0.5% PERMETHRIN AEROSOL SPRAY

- Contains the Synthetic Pyrethroid Permanone®
- Controls Pests for up to Four Weeks
- Controls Residential, Industrial and Garden Insects
- For Use on Dogs and on Premises to Control Fleas and Ticks
- For use on Livestock and Livestock Premises
- Controls Fleas and Ticks on Dogs for 14 Days
- An Aqueous, Stable, Micro Emulsion
- Controls Pests for up to Four Weeks
- Kills Lice and Their Eggs
- For Use on Bedding, Furniture and Other Inanimate Objects Infested with Lice
- Not for Use on Humans

ACTIVE INGREDIENT:

*Permethrin

0.50%

OTHER INGREDIENTS: 99.50%

100.000

100.00%

*(3-phenoxyphenylmethyl) (±) cis/trans 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate Cis/trans ratio: min. 35% (±) cis and max 65%(±) trans.

PERMANONE is a registered trademark of AgrEvo Environmental Health, Inc.

EPA Reg. No. 34797-84-EPA Est. No. See Bottom or Top of Can 34797-IA-03 or 3657-WI-2 or 11715-TN-1 or 47000-IA-1 Question? 1-800-XXX-XXXX

See Side Panel For Additional Precautions

Qualis Inc.

4600 Park Avenue Des Moines, Iowa 50321

NET CONTENTS

Read entire label before each use For pet use: Use only on dogs

PRECAUTIONARY STATEMENTS Hazards to Humans CAUTION

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Avoid contamination of feed and foodstuffs.

Environmental Hazards

This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

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 bursting.

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
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. Call a poison control center or doctor for 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.
Have the produ	ct container or label with you when calling

a poison control center or doctor or going for treatment

ACCEPTED with COMMENTS
In EPA Letter Dated:

MAR 7 2002

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Remove pets and birds and cover fish aquaria before space spraying or surface applications. This product is not for use on humans. If lice infestations should occur on humans, use a product labeled for use on humans. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

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 foods 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.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

SHAKE WELL BEFORE USING

Remove protective cap, hold container upright and spray from a distance of 12 to 15 inches. Remove birds and cover fish aquariums before spraying.

Houseflies, Fruit Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees, Black Flies, Skipper Flies, Blow Flies and Small Flying Moths: Close all doors and windows and spray room at the rate of 2 to 3 seconds per 1000 cubic feet. Direct spray to all parts of the room, especially windows and other light sources which attract these insects. Keep nozzle in constant motion.

Cockroaches, Waterbugs, Palmetto Bugs, Silverfish. Firebrats, Crickets, Scorpions, Spiders, Millipedes, Centipedes, Sowbugs and Pillbugs: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray when ever possible.

Ants: Spray trails, nests and points of entry. Spray on ants where possible.

Indian Meal Moths, Angoumois Grain Moths: Close doors and windows, direct spray into all parts of room especially around stored food product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1000 cubic feet of space. Keep area closed for 15 minutes following treatment following treatment

Exposed stages of Confused Flour Beetles, Sawtoothed Grain Beetles, Red Flour Beetles, Rice Weevils, Granary Weevils, Grain Mites: Spray into cracks and crevices, processing and handling equipment, around cartons or containers or other areas where these insects tend to congregate. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. Infested stored food products in the home should be disposed of.

Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves, and carpets.

Bedbugs: Spray mattresses, particularly around tufts and seams. Allow mattress to dry thoroughly before use. After mattress is dry, cover with mattress cover sheet. Do not use mattress without cover. Take beds apart and spray into all joints. Treat baseboards, moldings and floors.

To control Clothes Moths and Carpet Beetles on wool and other proteinaceous fibers: Remove 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, infected articles may be treated by spraying lightly, keeping nozzle at least three feet from fabric to avoid staining.

IN ANIMAL QUARTERS AND MILK ROOMS: For rapid control of House Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees and Small Flying Moths, close windows and doors and spray at the rate of 2 seconds per 1000 cubic feet of space. For best results, keep area closed for 10 minutes after spraying. Do not remain in treated area and ventilate after treatment is completed.

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Remove pets and birds and cover fish aquariums before space spraying or surface applications. This product is NOT FOR USE ON HUMANS. If lice infestation should occur on humans, use a product labeled for use on humans. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

SHAKE WELL BEFORE USING.

TO KILL LICE AND LOUSE EGGS: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, and then proceed to spray entire area to be treated. Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Spray each square foot for three seconds. Spray only those articles that cannot be either faundered or dry-cleaned such as mattresses and furniture. Allow all sprayed articles to dry thoroughly before use. Do not use on pillowcases, sheets or clothing.

BEDBUGS: Spray mattresses, particularly around tufts and seams. Allow mattress to dry thoroughly before use. After mattress is dry, cover with mattress cover sheet. do not use mattress without cover. Take beds apart and spray into all joints. Treat baseboards, moldings and floors.

EPA Reg. No. 34797-84-XXXXX EPA Establishment Number: See Bottom Or Top Of Can Questions? 1-860-XXX-XXXX

Qualis, Inc., 4600 Park Avenue Des Moines, IA 50321



BEDDING SPRAY

Spray Lice Treatment

- · Controls Pests for up to Four Weeks
- Kills Lice and Their Eggs
- · for Use on Bedding, Furniture and Other
- Ananimate Objects Infested with Lice
- Not for Use on Humans

ACTIVE INGREDIENT:

- Perm**ethrin**

0.50%

OTHER INGREDIENTS:

99 50%

1(3 phenoxpheriylmethyl) (+) cis/frans 3 (2,2 dichloroethenyl)-2,2 dimethylcyclopropanecorboxylate (Ce/frans ratio min 36% (+) dis and max 6%(+) trans

CAUTION:

KEEP OUT OF REACH OF CHILDREN

See side panel for additional precautionary statement.

NET WT 5 OZ (142 g)

READ ENTIRE LABEL BEFORE EACH USE PRECAUTIONARY STATEMENTS HAZAROS TO HUMANS:

CAUTION: Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling Avoid contamination of feed and foodstuffs.

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 bursting.

STORAGE: Store in a cool, dry area. Do not transport or store below 32° F.

CONTAINER DISPOSAL: Do not puncture or incinerate!

IF EMPTY: Place in trash or offer for recycling if available.

IF PARTLY FILLED: Call you local solid waste agency or
1-800-CLEANUP for disposal instruction. Never place unused product down any indoor or outdoor drain.

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

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.
Call a Poison Control Center or doctor for treatment advice

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

Have the product container or label with you when calling a Poison

Control Center or doctor or going for treatment.

