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UNITED STATES ENVIRONMENTAL PRO . ECTION AG

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

FEB 3 2004

Mr. Paul Kittleson Qualis, Inc. 4600 Park Ave. Des Moines, IA 50321

Subject:

Amendment Detailing "Packaged By" and "Distributed By" and Adding

New Pest (Screw Worms) 0.5% Permethrin Aerosol Spray

EPA Reg. No. 34797-84

Your Submissions Dated November 7, 2003 and January 28, 2004 (Email)

Dear Mr. Kittleson:

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 below. Two 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. Near the top of the right-hand column on page 1, delete the statement "For animal use: Use only on animal identified on label." Instead, in accordance with PR Notice 96-6 (Pet Pesticide Product Label Statements), add the following statement to the directions for use on dogs: "Use only on dogs." Although the PR Notice requests that this statement be added immediately below the statement "READ ENTIRE LABEL BEFORE EACH USE", we have allowed its placement within the pet use directions for products with uses other than pet uses on the master label. Also, in accordance with the PR Notice, the statement "READ ENTIRE LABEL BEFORE EACH USE" should appear capitalized and in bold type.

If you have any questions regarding this action, please contact me at (703) 305-6100.

Sincerely,

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
- Kills Lice and Their Eggs
- For Use on Bedding, Furniture and Other Inanimate Objects Infested with Lice
- Not for Use on Humans
- Kills Screw Worms on Beef Calle Horses and Sheep

ACTIVE INGREDIENT:

*Permethrin

0.50%

OTHER INGREDIENTS:

99.50%

100.00%

*(3-phenoxyphenylmethyl) (±) cis/trans 3-(2,2-

dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate Cis/trans ratio: min. 35% (\pm) cis and max 65%(\pm) trans.

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

One of the following:



EPA Reg. No. 34797-84-XXXXX

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

Oualis Inc. 4600 Park Avenue Des Moines, Iowa 50321



Read entire label before each use Accommunity of the begon vious in mail identified on label

PRECAUTIONARY STATEMENTS **Hazards to Humans CAUTION**

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

Environmental Hazards CERTIFICATION SECTION (CAVE I)

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. | |
| • | ct container or label with you when calling | |

ALL COMMENTS In EPA Letter Dated:

3 2004 FEB

Under the Federal Insecticide. Fungicide, and Rodenticide Act.

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, terbugs, Palmetto Bugs, Silverfish, Firebrats, Criticets, 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.

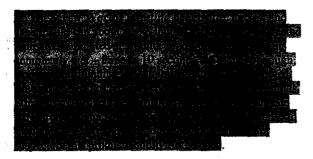
Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves, and carpets. Retreat if infestation occurs, but not more than once every two weeks.

Bedbugs: Spray mattresses, particularly around tufts and seams. Allow mattress to dry thoroughly before use. After mattress is dry, cover with mattress cover and 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.

TO TREAT LIVESTOCK: To protect beef cattle, dairy cattle, goats, sheep, hogs and horses from attacks of Stable Flies, Horse Flies, Deer Flies, Face Flies, House Flies, Horn Flies, Mosquitoes and Gnats: Spray about 2 seconds on each side being careful to spray back, withers and forelegs thoroughly. To protect from Face Flies, spray the face and head, but do not spray into eyes. FOR SWINE: Do not ship animals for slaughter within 5 days of last treatment.



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.

For control of Bedbugs and Mites in poultry houses, spray crevices of roost poles, cracks in walls and cracks in nests where the bedbugs and mites hide.

Fleas and Ticks (Adults and Larvae): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering with special attention to cracks and crevices around base boards and window and door frames. Infested upholstered furniture may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

Hazards to Domestic Animals Do not spray directly in/on eyes, mouth or genitalia of pets. Do not use on dogs under twelve (12) weeks old. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals. Sensitivities may occur after using any pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

To control Fleas, Ticks and Lice on dogs. Starting at the tail, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to insure penetrating the coat. Dampen the fur up to the head.

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. 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 laundered 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.

FOR THE 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, Spider Mites, Red Mites and Leafminers.

May be used on plants, as well as a multi-purpose spray in small gardens and/or 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, delphinums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, 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, Laca Bugs, Japanese Beetles, Pavement Ants, Clover Mites and Army Worms. When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Spray in one second bursts. 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.

STORAGE & DISPOSAL

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 your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

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. Tals product is NOT 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 value 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 laundered 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 and sheet. Do not use mattress without cover. Take beds apart and spray into all joints. Treat baseboards, molding and floors.

One of the following:



EPA Reg. No. 34797-84-XXXXX

EPA Establishment Number: See Bottom or Top of Can Questions? 1-800-XXX-XXXX

UPC CODE

Bedding Spray

- 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%

100.00%

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

CAUTION:

KEEP OUT OF REACH OF CHILDREN
See side panel for additional precautionary statement
NET WT 5OZ (142 g)

READ ENTIRE LABEL BEFORE EACH USE

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 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.

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| | 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 advantage. |

Have the product container or label with you when calling a poison control center or doctor or going for treatment

Proposed changes Crey Shared

11/7/2003 1/28/2004 Revised Proposed EPA Labeling, Bedding Spray Unit Label

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