



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 29, 2025

Craig Bernard
Regulatory Compliance Manager
QuestSpecialty
P.O Box 624
Brenham, TX 77834

Subject: Label Amendment - Registration Review Mitigation for Prallethrin and
Esfenvalerate
Product Name: CS 101 Roach & Ant Spray
EPA Registration Number: 44446-65
Application Date: March 2, 2021
Case Number: 476300 & 473349

Dear Craig Bernard:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Prallethrin and Esfenvalerate Interim Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Lauren Weissenborn via email at weissenborn.lauren@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Cathryn Britton". The signature is fluid and cursive, with the first name "Cathryn" and last name "Britton" clearly distinguishable.

Cathryn Britton
Chief, Risk Management and Implementation
Branch V
Pesticide Re-evaluation Division (7508M)
Office of Pesticide Programs

ENCLOSURE: Stamped label

Master Label
Homeowner Use

CS 101
Roach & Ant Spray
Effective up to 7 weeks against:
Ants, Cockroaches, Fleas, Ticks
and other listed insects.
Pleasant [Vanilla] fragrance.
18,000 Volt Dielectric Strength

For both indoor and outdoor use

For use in Homes and non-food areas of Kennels, Commercial Buildings such as warehouses, theatres, office buildings, schools, motels, hotels, restaurants, food processing facilities, industrial and institutional facilities, garbage cans and dumpsters.

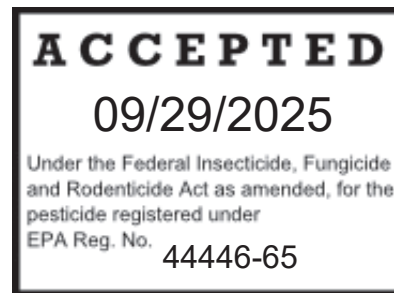
ACTIVE INGREDIENTS:

(RS)-2-Methyl-4-oxo-3-(2-propynyl) cyclopent-2-enyl	
(1RS)-cis, trans, chrysanthemate	0.03%
Esfenvalerate	0.05%
N-Octyl bicycloheptene dicarboximide*	0.24%

OTHER INGREDIENTS **:	<u>99.68%</u>
TOTAL:	100.00%

* MGK 264, Insecticide Synergist

** Contains Petroleum distillate



EPA Reg. No. 44446-65 EPA Est. No. 44446-TX-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Additional Cautions on back panel.

NET WT. 15 OZ. (425 g)

[(Lot No.)(Batch Code) _____]

QuestSpecialty Corporation

P.O. Box 624

Brenham, TX 77834

Master Label
Homeowner Use

Back Panel

FIRST AID	
If Swallowed:	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Do not give ANY liquid to the person.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none">• 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:	<ul style="list-style-type: none">• 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.
If inhaled:	<ul style="list-style-type: none">• 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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-255-3924 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate. Vomiting may cause aspiration pneumonia.	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
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 and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove pets, birds, and cover fish aquariums before spraying. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Wear long sleeved shirt, long pants, shoes, socks and protective chemical-resistant gloves (such as those made from Barrier Laminate, Nitrile Rubber, Neoprene Rubber or Viton).

User Safety Requirements: Follow manufacturer's instructions for cleaning/maintain PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations
<ul style="list-style-type: none">• User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

Do not apply directly to or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas. Do not contaminate water when disposing of equipment, wash water, or rinseate. See Directions for Use for additional precautions and requirements.

PHYSICAL OR CHEMICAL HAZARDS

FLAMMABLE. Keep away from heat, sparks, and open flame. Do not use under or around gas stoves, water heaters, or other gas utilities (including home heating units) with open flames or pilot lights. Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

Master Label
Homeowner Use

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

Use Restrictions & Precautions

- Do not allow adults, children, or pets to enter the treated area until vapors, mists, and aerosols have dispersed, sprays have dried and the treated area has been thoroughly ventilated.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. Only protected handlers may be in the area during application.
- Remove pets, birds and cover fish aquariums before spraying.
- Apply this product only as a coarse spray or crack and crevice treatment to localized areas where pests are found or may occur. Spray surfaces until wet.
- For indoor use, remove or cover exposed food and drinking water before application.
- For indoor use, remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.
- Do not use in aircraft.
- For indoor residential dwellings and outdoor sites (including outdoor residential sites, automobiles, and manure):
 - Product must be formulated to deliver no more than this maximum rate when used according to directions:
 - Surface applications – 0.01 lbs ai/1000 square feet
 - Crack/crevice or spot – 0.05 lbs ai/1000 square feet
- For pet premise treatment (pets are not present):
 - Product must be formulated to deliver no more than this maximum rate when used according to directions:
 - Surface applications – 0.01 lbs ai/100 square feet
- Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours).
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.
- Do not allow to enter indoor or outdoor drains unless labeled for drain treatments.
- *No permita la entrada a desagües internos o externos a menos que el etiquetado indique que está permitido el uso del producto para tratamiento de desagües.*

SHAKE WELL BEFORE USE

Follow proper disposal procedures on this label. *Siga las indicaciones del etiquetado para el desecho apropiado del producto.*



Use this spray as a spot or crack and crevice treatment to control cockroaches, fleas, silverfish, ticks, waterbugs, and other insects listed below.

FOR SPOT TREATMENT:

Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft by 0.5 ft.).

TO KILL *Black Widow Spiders, Carpet Beetles, Cockroaches, Crickets, Scorpions, Silverfish, Sowbugs and Spiders:* Spray areas where these insects are found or may hide, including dark corners of rooms and closets; cracks and crevices in walls; along baseboards and door and window frames; behind and beneath sinks, stoves, refrigerators, and cabinets; and around garbage cans, plumbing and other utility installations. Pests driven out of hiding places should be sprayed directly.

Ants: For ants, spray ant trails and around doors and windows, and wherever else these pests may find entrance.

Brown Dog Ticks and Fleas: Apply as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames, and localized areas of floor and floor coverings where these pests may be present. Pet's old bedding should be removed and replaced with clean, fresh bedding after treatment. **DO NOT SPRAY PETS WITH THIS PRODUCT.** Treat pets with a registered flea and tick control product prior to reentering treated areas.

Master Label
Homeowner Use

FOR CRACK AND CREVICE TREATMENT:

TO KILL *Ants, Black Widow Spiders, Brown Dog Ticks, Carpet Beetles, Cockroaches, Crickets, Fleas, Scorpions, Silverfish, Sowbugs and Spiders*: Apply spray in small amounts directly into cracks and crevices. Equipment capable of delivering a pin stream should be used in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where these insects hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food handling surfaces. Treat surfaces to ensure thorough coverage but avoid runoff. To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structures and plants.

OUTDOOR USES.

Flies and mosquitoes: Use only outdoors as an aid in reducing annoyance from these insects. Spray outside surfaces of window and door frames as well as other areas where these pests may enter the home. Also spray dark corners and localized resting areas (such as under eaves) or porches, patios, and garages where these insects may congregate. Flies and mosquitoes coming to rest on treated surfaces will be killed.

All outdoor spray applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

1. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
2. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
3. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry place. Keep container closed.

DISPOSAL AND CONTAINER HANDLING: 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.

Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

CONTAINS (CAS#): Isoparaffinic Hydrocarbon (64742-47-8), Carbon Dioxide (124-38-9), Fragrance Oil (N/A).

HMIS RATINGS: Health-1, Flammability-2, Reactivity-1, Personal-A.

Master Label
Professional/Institutional Use

CS 101
Roach & Ant Spray
Effective up to 7 weeks against:
Ants, Cockroaches, Fleas, Ticks
and other listed insects.
Pleasant [Vanilla] fragrance.
18,000 Volt Dielectric Strength

For both indoor and outdoor use

For use in Homes and non-food areas of Kennels, Commercial Buildings such as warehouses, theatres, office buildings, schools, motels, hotels, restaurants, food processing facilities, industrial and institutional facilities, garbage cans and dumpsters.

ACTIVE INGREDIENTS:

(RS)-2-Methyl-4-oxo-3-(2-propynyl) cyclopent-2-enyl	
(1RS)-cis, trans, chrysanthemate	0.03%
Esfenvalerate	0.05%
N-Octyl bicycloheptene dicarboximide*	0.24%

OTHER INGREDIENTS **: 99.68%

TOTAL: 100.00%

* MGK 264, Insecticide Synergist

** Contains Petroleum distillate

EPA Reg. No. 44446-65 EPA Est. No. 44446-TX-1

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FIRST AID	
If Swallowed:	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Do not give ANY liquid to the person.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none">• 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:	<ul style="list-style-type: none">• 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.
If inhaled:	<ul style="list-style-type: none">• 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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-315-9819 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate. Vomiting may cause aspiration pneumonia.	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND
DOMESTIC ANIMALS
CAUTION**

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Wear long sleeved shirt, long pants, shoes, socks and protective chemical-resistant gloves (such as those made from Barrier Laminate, Nitrile Rubber, Neoprene Rubber or Viton).

User Safety Requirements:

- Follow manufacturer's instructions for cleaning/maintain PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations
<ul style="list-style-type: none">• User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.• User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.• User should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment wash-waters.

PHYSICAL OR CHEMICAL HAZARDS

FLAMMABLE. Keep away from heat, sparks, and open flame. Do not use under or around gas stoves, water heaters, or other gas utilities (including home heating units) with open flames or pilot lights. Contents under pressure. Do not puncture or incinerate container.

Master Label
Professional/Institutional Use

Exposure to temperatures above 130°F may cause bursting. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

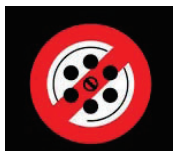
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use Restrictions & Precautions

- Do not enter or allow others to enter until vapors, mists, and aerosols have dispersed, sprays have dried and the treated area has been thoroughly ventilated.
- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.
- Do not apply more than 1 time per day.
- Use this spray as a spot or crack and crevice treatment to control cockroaches, fleas, silverfish, ticks, waterbugs, and other insects listed below.
- Apply this product only as a coarse spray or crack and crevice treatment to localized areas where pests are found or may occur. Spray surfaces until wet.
- Do not use in food/feed areas of food/feed establishments, restaurants or other areas where food/feed 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.
- Non-food/feed areas of food/feed areas are areas such as garbage rooms, garbage cans and dumpsters, lavatories, floor drains (to sewers, entries and vestibules), offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling). Avoid contamination of food and feedstuffs.
- For indoor use, remove or cover exposed food and drinking water before application.
- For indoor use, remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.
- Do not use in aircraft.
- For use in drains or sewers:
 - Except when applying to sewers or drains as instructed on this label, do not apply directly to sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.
- For indoor commercial animal housing and equipment (animals not present), indoor food handling/processing facilities, residential dwellings and commercial, institutional indoor sites and general outdoor sites (including commercial/institutional/industrial premises, and residential sites):
 - Product must be formulated to deliver no more than this maximum rate when used according to directions:
 - Surface applications – 0.01 lbs ai/1000 square feet
 - Crack/crevice or spot – 0.05 lbs ai/1000 square feet
- For pet premise treatment (pets are not present):
 - Product must be formulated to deliver no more than this maximum rate when used according to directions:
 - Surface applications – 0.01 lbs ai/100 square feet
- Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours).
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.
- Do not allow to enter indoor or outdoor drains unless labeled for drain treatments.
- *No permita la entrada a desagües internos o externos a menos que el etiquetado indique que está permitido el uso del producto para tratamiento de desagües.*

SHAKE WELL BEFORE USE

Follow proper disposal procedures on this label. *Siga las indicaciones del etiquetado para el desecho apropiado del producto.*



Master Label
Professional/Institutional Use

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Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft by 0.5 ft).

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Ants: For ants, spray ant trails and around doors and windows, and wherever else these pests may find entrance.

Brown Dog Ticks and Fleas: Apply as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames, and localized areas of floor and floor coverings where these pests may be present. Pet's old bedding should be removed and replaced with clean, fresh bedding after treatment. **DO NOT SPRAY PETS WITH THIS PRODUCT.** Treat pets with a registered flea and tick control product prior to reentering treated areas.

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OUTDOOR USES.

Flies and mosquitoes: Use only outdoors as an aid in reducing annoyance from these insects. Spray outside surfaces of window and door frames as well as other areas where these pests may enter the home. Also spray dark corners and localized resting areas (such as under eaves) or porches, patios, and garages where these insects may congregate. Flies and mosquitoes coming to rest on treated surfaces will be killed.

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2. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
3. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry place. Keep container closed.

DISPOSAL AND CONTAINER HANDLING: 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.

Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

CONTAINS (CAS#): Isoparaffinic Hydrocarbon (64742-47-8), Carbon Dioxide (124-38-9), Fragrance Oil (N/A).

HMIS RATINGS: Health-1, Flammability-2, Reactivity-1, Personal-A.