05/25/2001



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

May 25, 2001

Mr. Peter M. Jankowski CCL Custom Manufacturing 1 W Hegeler LN Danville, IL 61832

Subject:

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Revision of Label per March 9, 1999 Registration

CCL Multi-Purpose Insecticide Spray

EPA Reg. No. 46813-64

Your Letter Dated February 20, 2001

Dear Mr. Jankowski:

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. 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.

Unfortunately, some of the MRID numbers you cited were not acceptable. MRID 24292951869 does not exist. Please remove house flies from your label or submit or cite efficacy data to support them. You may keep cockroaches and scorpions on the label but please note that MRID 44783503 was found unacceptable by the Agency. Please do not reference this study in the future.

In addition to the above, at your next label printing please update your label as follows:

1) PR Notice 2001-1 has been finalized. At your next label printing please update your label as follows:

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. Call a poison control center for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

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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-xxx-xxxx for emergency medical treatment information. per PR Notice

- 2) Please remove <u>all</u> references to the application of your product to bedding (from both front panel claims and text). Exposure to adults and children from treated bedding has not been fully evaluated. The claim for mattresses can be retained.
- 3) Please add the following statement to your "Directions for Use":
 - "We recommend that those with asthma or severe allergies consult their doctor before using this product and have someone else apply this product.
- 4) Under bedbugs and the section on mattresses for dust mites add the following precautions: "After mattress is dry cover with mattress cover and sheet. Do not use mattress without cover".
- Add the instruction "Vacuum entire area once dry. Since vacuuming stirs dust up in the air those with allergies should have another person vacuum or should wear a dust mask and use a vacuum with a high efficiency particulate (HEPA) filter." to the instructions for carpets, upholstered furniture and mattresses".

If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (75%C)

CCL MULTI-PURPOSE INSECTICIDE SPRAY

- CONTAINS THE SYNTHETIC PYRETHROID PERMANONE®
- CONTROLS NAMED RESIDENTIAL, INDUSTRIAL AND GARDEN INSECTS
- FOR USE ON DOGS AND ON PREMISES TO CONTROL FLEAS AND TICKS
- AN AQUEOUS STABLE MICROEMULSION
- 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
- FOR USE ON LIVESTOCK AND THEIR PREMISES
- CONTROLS FLEAS AND TICKS ON DOGS FOR 14 DAYS

*ACTIVE INGREDIENTS:

*Permethrin

0.25% 99.75%

OTHER INGREDIENTS

100.00%

 $\hbox{$^*(3-phenoxypheny)$methyl (+/-) cis/trans 3-(2,2-dichloroethenyl)-2, 2-dimethyl cyclopropanecarboxylate}$

(Cis/Trans ratio: Min. 35% (+/-) cis and max. 65% (+/-) trans.)

PERMANONE - Registered Trademark of AgrEvo Environmental Health, Inc.

EPA REG. NO.

EPA EST. NO.

46813-64

46813-CN-03

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

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

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

IF ON SKIN: Wash affected areas immediately with soap and water. Get medical attention if irritation persists.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS NET CONTENTS:

ACCIPTED with COMMENTS In REA Letter Docal

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Under the Rederal factorists A to amended, and the factorists A to amended, for the product registered under EPA feet to 46813-64

READ ENTIRE LABEL BEFORE EACH USE FOR PET USES: USE ONLY ON DOGS PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Avoid spraying in eyes. Avoid breathing spray mist. Avoid contact with skin. Wash hands thoroughly after use. Vacate room after treatment. Upon reentry, open windows and ventilate for at least 2 hours. Avoid contamination of feed and foodstuffs. Cover or remove fishbowls. This product is not for use on humans. Keep children and/or pets out of treated areas during treatment. Do not apply this product to or near children's toys.

ANIMALS: Do not spray directly in/on eyes, mouth or genitalia of pets. Use only on dogs. Do not use on cats or kittens. Do not use on puppies less than twelve (12) weeks old. Consult a veterinarian before using this product on debilitated, aged, pregnant, medicated 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.

ENVIRONMENTAL HAZARDS

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

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. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR 11SE.

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

STORAGE AND DISPOSAL

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

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

Disposal: Wrap container in several layers of newspaper and dispose of trash. Can may be disposed with other recyclables where local law permits. Do not incinerate or puncture.

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 the edible product areas of food/feed processing plants, 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.

Not for use in federally inspected meat and poultry plants.

In the home, cover all food handling surfaces, and cover or remove all food and cooking utensils, or wash thoroughly after treatment. Exposed food should be covered or removed.

NONFOOD AREAS: CCL Multi-Purpose Insecticide Spray may be applied in non-food/feed areas. Non-food/feed establishment areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, 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, MOSQUITOS, 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. Upon reentry, open windows and ventilate for at least 2 hours.

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 whenever possible. Spray until the surface is damp, but not to the point of run-off. Avoid excess application.

ANTS: Spray trials, 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. Upon reentry, open windows and ventilate for at least 2 hours.

EXPOSED STAGES OF CONFUSED FLOUR BEETLES, SAW-TOOTHED 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 until the surface is damp, but not to the point of run-off. Avoid excess application. Spray 30 seconds for each 100 square feet of surface. Keep area closed for 45 minutes to 1 hour after treatment. Upon reentry, open windows and ventilate for at least 2 hours. Infested stored food products in the home should be disposed of.

CARPET BEETLES: Spray directly on beetles, floors, baseboards, shelves and carpets. Spray until the surface is damp, but not to the point of run-off. Avoid excess application.

BEDBUGS: Spray mattresses, particularly around tufts and seams. Take beds apart and spray in joints. Treat baseboards, moldings, and floors. Spray until the surface is damp, but not to the point of run-off. Avoid excess application. Allow all sprayed articles to dry thoroughly before reuse.

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. Spray until the surface is damp, but not to the point of run-off. Avoid excess application. After airing, infested articles may be treated by spraying lightly, keeping nozzle at least three feet from fabric to avoid staining. Allow all sprayed articles to dry thoroughly before use.

IN ANIMAL QUARTERS AND MILK ROOMS: For rapid control of House Flies, Mosquitoes, Gnats, Wasps, Hornets, Bees, and Small-Flying Moths. Remove animals prior to application. 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. Keep children and/or pets out of treated areas during treatment. Do not apply this product to or near children's toys. Upon reentry, open windows and ventilate for a least 2 hours.

TO TREAT LIVESTOCK: To protect beef cattle, dairy cattle, goats, sheep, hogs, and horses from attacks of Stable Flies, Horse Flies, Horse Flies, Horne Flies, Mosquitoes, and Gnats: Spray about 3 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. Repeat treatment when flies are troublesome.

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 base of the hair. Repeat every 3 weeks if required.

TO CONTROL POULTRY LICE, soray 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. Spray until the surface is damp, but not to the point of run-off. Avoid excess application.

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 crack and crevices around baseboards, and window and door frames. Infested upholstered furniture may also be treated with this product. Spray until the surface is damp, but not to the point of run-off. Avoid excess application. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use.

TO CONTROL FLEAS AND TICKS 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. Repeat application every two weeks if necessary.

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 garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Spray until the surface is damp, but not to the point of run-off. Avoid excess application. Allow all sprayed articles to dry thoroughly before use.

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, Spiders, Red Mites, and Leafminers.

May be used on plants, as well 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, asiers, aveleas, begonias, carnations, chrysanthemums, dahlias, delphiniums, dogwood, English (vy, 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, Lace 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. Repeat treatment as infestations occur.

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

Manufactured by: CCL INDUSTRIES 105 Gordon Baker Road Willowdale, Ontario, M2H 3P8