



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 15 2005

Kim Davis
K-G Packaging, Inc
c/o RegWest Company, LLC
30856 Rocky Road
Greeley, CO 80631-9375

Subject: Amendment - Revised Labeling and CSF to reduce the VOC content
Multi-Purpose Insecticide II
EPA Reg. No. 46813-66
Your submission dated March 11, 2005

Dear Ms. Davis:

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.

1. Move the statements beginning, "This product is not for use on humans. If lice and ending until surfaces are dry", to the Precautions and General Instructions under Directions for Use.
2. Move the precautionary statements under Animals to the directions to control fleas and ticks on dogs.
3. Add the following precautions under Bedbugs and On Mattresses: "Do not treat bed linens or pillowcases."

The Confidential Statement of Formula (dated March 11, 2005), submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable.

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. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

BeWanda Alexander for

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

cc: Attachment

Multi-Purpose Insecticide II

**ACCEPTED
with COMMENTS
In EPA Letter Dated
AUG 15 2005**

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

46813-66

Contains the Synthetic Pyrethroid Permanone®
Controls named Residential, Industrial and Garden Insects
For Use on Dogs and on Premises to Control Fleas and Ticks
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
Kills House Dust Mites in Carpets, Bedding, Curtains and on Upholstery

Controls [Helps Control] House Dust Mites (*Dermatophogoides* spp.) for up to 8 Weeks [2 Months] [60 Days]
in Carpets, Bedding, Curtains and on Upholstery

Controls [Helps Control] House Dust Mites that may cause Asthma, Hay Fever, Rhinitis, Watery Eyes, Sneezing
Permanone® is Effective in the Control of [Helps Control] Dust Mites
For Use on Bedding, Furniture and Other Inanimate Objects
Not for Use on Humans
Kills Screw Worms on Beef Cattle, Horses and Sheep

Active Ingredient:

*Permethrin	0.5%
Other Ingredients	99.5%
Total	100.0%

*(3-phenoxyphenyl) methyl (±) cis/trans 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate

Cis/trans ratio: Min. 35% (±) cis and max. 65% (±) trans.

Permanone - Registered Trademark of Valent Biosciences Corporation

Keep Out of Reach of Children

CAUTION

See back [side] panel for additional precautionary statements

Net Contents: _____ ounces

{Back/Side Panel}

**READ ENTIRE LABEL BEFORE EACH USE
FOR PET USE: USE ONLY ON DOGS**

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Thoroughly wash with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of feed and foodstuffs. **This product is not for use on humans.** If lice infestations should occur on humans, use a product labeled for use on humans. Keep children and/or pets out of areas during treatment and do not allow them to contact treated areas until surfaces are dry. **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 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, immediately consult a veterinarian.

First Aid

Have the product container or label with you when calling a poison control center or doctor or going for treatment. [You may also call {toll free number} for emergency medical treatment information.]

If on Skin or Clothing:	<ul style="list-style-type: none"> • Take of contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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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 eyes.• Call a poison control center for treatment advice.
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Environmental Hazards

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater or rinsate.

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 USE

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

Precautions and General Instructions

We recommend that those with asthma or severe allergies consult their doctor before using this product and possibly have someone else apply this product. Since vacuuming stirs dust up into the air, those with asthma or severe allergies who do choose to apply this product must wear a dust mask and use a vacuum with a high efficiency particulate (HEPA) filter. Do not apply this product to or near children's toys.

Shake Well Before Using

Remove protective cap, hold container upright and spray 12 to 15 inches from surfaces/objects to be treated. When spraying surfaces/objects, spray until surface/object is damp, but not to the point of run-off, and avoid excess product application. When spraying fabrics or furniture, first spray in an inconspicuous area to test for incompatibility (staining, discoloration, etc.) before general application. Inspect area after spray dries and, if acceptable, spray entire area to be treated. When using this product as a space spray, upon reentry to treated areas, open windows and ventilate for at least 2 hours.

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. Nonfood Areas: Multi-Purpose Insecticide II 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, vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Not for use in federally inspected meat and poultry plants.

In the home cover all food processing surfaces and cover or remove all exposed food and cooking utensils, or thoroughly wash after treatment. Remove birds and cover fish aquariums before spraying.

Not for use on plants being grown for sale or other commercial use, 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, lawns and grounds.

Application Instructions

Bees, Black Flies, Blow Flies, Fruit Flies, Gnats, Hornets, Houseflies, Mosquitoes, Skipper Flies, Small Flying Moths and Wasps: 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.

Centipedes, Cockroaches, Crickets, Firebrats, Millipedes, Palmetto Bugs, Pillbugs, Scorpions, Silverfish, Sowbugs, Spiders and Waterbugs: 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.

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

Angoumois Grain Moths and Indian Meal 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.

Exposed Stages of Confused Flour Beetles, Grain Mites, Granary Weevils, Red Flour Beetles, Rice Weevils and Sawtoothed Grain Beetles: 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. Dispose of infested stored food products.

Carpet Beetles: Spray directly on beetles, floors, baseboards, shelves and carpets. Vacuum entire area once dry.

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

To Control Carpet Beetles and Clothes Moths on wool and other proteinaceous fibers: Remove infested articles from storage, thoroughly brush and, if possible, air for several hours in sunlight. Liberally apply spray to empty chests, closets, bureaus and other storages directing the spray into cracks, joints and crevices. After airing, lightly spray infested articles, keeping nozzle at least three feet from fabric to avoid staining. Allow all sprayed articles to thoroughly dry before use.

To Control [Kill] [Help Control] House Dust Mites (*Dermatophagoides spp.*): CCL Multi-Purpose Insecticide II controls [helps control] house dust mites that may cause asthma, hay fever, rhinitis, watery eyes and sneezing. One treatment lasts up to 8 weeks [2 months] [60 days]. **On Upholstered Furniture:** Hold container upright with nozzle away from you. Depress valve and spray from a distance of 8 to 10 inches. Do not use on delicate fabrics. Allow furniture to thoroughly dry before using. **On Carpets:** Spray over entire carpet until damp. Hold the nozzle approximately 12 to 18 inches from the carpet surface and spray in a sweeping motion. Use an overlapping pattern to ensure total coverage. After application, brush the surface of the carpet with a broom or brush to ensure deep penetration. Allow carpet to thoroughly dry before reentering the treated area. Accelerate drying time by using a fan. Vacuum entire area once dry. **On Mattresses and Bedding:** Spray the top, bottom and sides of mattresses until damp, paying particular attention to tufts and seams. Allow to thoroughly dry before using. After mattress is dry cover with mattress cover and sheet. Do not use mattress without cover.

Fleas and Ticks (Adults and Larvae): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering, paying special attention to cracks and crevices around baseboards and window and door frames. Infested upholstered furniture may also be treated with this product. Vacuum area once dry.

To Kill Lice and Louse Eggs: 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. Allow all sprayed articles to thoroughly dry before use. After mattress is dry cover with mattress cover and sheet. Do not use mattress without cover. Vacuum area once dry.

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 ensure penetrating the coat. Dampen the fur up to the head. Repeat application every two weeks if necessary.

In Animal Quarters and Milk Rooms: For rapid control of *Gnats, House Flies, Mosquitoes 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.

To Treat Livestock: To protect beef cattle, dairy cattle, goats, hogs, horses and sheep from attacks of *Deer Flies, Face Flies, Gnats, Horn Flies, Horse Flies, House Flies, Mosquitoes and Stable Flies:* Spray about 3 seconds on each side being careful to thoroughly spray back, withers and forelegs. To protect from *Face Flies*, spray the face and head, but do not spray into eyes. Repeat treatment when flies are troublesome.

To Kill Screw Worms infesting beef cattle, horses and sheep, hold can about 4 to 8 inches from area to be treated with nozzle pointed at wound. Spray the entire wound area, including surrounding area, until it is completely wet - three to ten seconds are usually enough. This product is not recommended for use in deep wounds. Some strains of screw worms may develop resistance to pyrethroids. This will be observed by lack of response to treatment. Do not use this product where pyrethroid resistance is known or suspected.

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: Thoroughly spray roosts, walls and nests or cages then spray a fine mist over the birds.

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.

For the Control of Garden Insects: For use on ornamental plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, roses, rubber plants snapdragons, stocks, wandering Jews, zinnias and other ornamentals to kill the insects listed below. 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. Effective when used as directed to kill *Aphids, Armyworms, Clover Mites, Exposed Thrips, Japanese Beetles, Lace Bugs, Leafminers, Pavement Ants, Red Mites, Spider Mites and Whiteflies*. When spraying, do not operate closer than 18 inches. Spray, using a sweeping motion, in one second bursts. Do not saturate tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. Directly contact insects whenever possible. Repeat treatment as infestations occur.

Storage and Disposal

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

Storage: Store in a cool (preferably locked) place inaccessible to children and pets and away from heat or open flame. Do not transport or store below 32°F. **Disposal:** Do not puncture or incinerate container! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your solid waste agency [or 1-800-CLEANUP] for disposal instructions.

In case of medical emergencies or health and safety inquiries, or in case of fire, leaking or damaged containers, information may be obtained by calling 1-800-{phone number}.

For product information call toll-free: 1-800-{phone number}. [Questions? Call {phone number}]

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

EPA Reg. No. 46813-66 EPA Est. No. 46813-CAN-3

Manufactured by [for]
K-G Packaging, Inc.
8001 Keele Street
Concord, Ontario L4K 1Y8
[{phone, fax numbers}]
[{website}]
Made in [Product of] Canada

[] Denotes alternate/optional language

{ } Denotes language that does not appear on the market labeling

DATE: 30 / JUN /2005

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF TGA/MP** EP
DP BARCODE No.: D317671 REG. No.: 46813-66
PRODUCT NAME: Multi-Purpose Insecticide II
COMPANY: KIK Custom products-Rexdale Plant
PCC: 109701; Decision No.: 355479; FOOD USE
INTEGRATED FORMULATION: Yes NO

FROM: Shyam B. Mathur,
Product Chemistry Team Leader
Technical Review Branch/RD (7505C)

S. Mathur
6130705 -

TO: BeWanda Alexander / George Larocca, RM 13
Insecticide Branch/RD(7505C)

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INTRODUCTION

The registrant has submitted a revised CSF for basic formulation (dated 03-11-05) to support the registration of the subject end-use product. The revised basic CSF and the product label reflect change in the name of the product from "CCL Multipurpose Insecticide II" to "Multipurpose Insecticide II", deleting the "CCL" portion of the name. There is no change in the active ingredient content of the formulation, but does have revisions to the inert ingredients to reduce VOC content to meet standards of State of California and other states. TRB has been asked to review the revised basic CSF submitted.

SUMMARY OF FINDINGS

1. The end use product contains Permethrin Technical [Reg. No. 73049-278, 11.55%] as the active ingredient with the product label claim of 0.50%.
2. All the food use inert ingredients present in the revised CSF for basic formulations are cleared by the Agency, and are exempted from tolerance requirements for food use, except for one. For the name please refer to Confidential Appendix.
3. The CSF for basic formulation (dated 03-11-05) is filled out completely and correctly. The nominal concentration of the active ingredient concurs with the product label claim nominal concentration. The CSF is in compliance with PR Notice 91-2.

CONCLUSIONS:

TRB has reviewed the CSF for basic formulation (dated 03-11-05) and has determined that it is not acceptable for the following reason:

One of the inert ingredients present in the formulation does not have tolerance exemption for food use. For the name please refer to Confidential Appendix.

CONFIDENTIAL APPENDIX

DP BARCODE No.: D317671 REG. No.: 46813-66 PRODUCT NAME: Multi-Purpose Insecticide II

The Propellant A-46 contains an ingredient Isobutane, which does not have tolerance exemption for food use. The registrant is recommended to replace this propellant with other propellant.

↓ Need to clear this propellant generically and with DCI since there are a large number of products that use this propellant A-46.

G. Labrecq
8/15/2005