

## 2/20/2003 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

#### FEB 2 0 2003

Mr. Adrian Krygsman Aventis Environmental Science 95 Chestnut Ridge Road Montvale, NJ 07645

Subject:

Label Amendment Updating First Aid per PR Notice 2001-1

Perigen Industrial Mothproofer

EPA Reg. No. 432-1153

Your Submission, Dated January 7, 2003

#### Dear Mr. Krygsman:

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. Revise the "If Swallowed" First Aid statements as recommended in PR Notice 2001-1 for products containing more than 10% petroleum distillate:

# If swallowed: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

2. Add the following Note to Physician to the First Aid section:

"Contains petroleum distillate - vomiting may cause aspiration pneumonia."

- 3. Move the Storage and Disposal box so that it does not appear in the middle of general misuse statement ("It is a violation of Federal law to use this product in a manner inconsistent with its labeling").
- 4. Update the company name/phone number in the "Container Disposal for Returnable Containers" section.

- 5. In the "Pesticide Disposal" instructions, correct the spelling of "an" in the last line (currently "and").
- 6. Delete "0.01% w/v" from the following sentence in the first paragraph on the last page of the label: "Addition of a small quantity 0.01% w/v (1 ml/liter) of 80% acetic acid to the emulsion may aid fastness." The revised sentence should read simply "Addition of a small quantity (1 ml/liter) of 80% acetic acid to the emulsion may aid fastness."

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

Sincerely,

Susan L. Stanton, for George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

Enclosure

;



# PERIGEN INDUSTRIAL MOTHPROOFER

- AN INSECTICIDE FOR MANUFACTURING USE ONLY.
- \* FOR MANUFACTURING USE IN PRODUCING WOOL AND WOOLY POLAMIDE BLENDS.
- \* PERIGEN IS STABLE IN BOILING ACID AND NEUTRAL (BELOW pH 7.5) DYEBATHS FOR AT LEAST 7 HOURS.
- \* PERIGEN EXHIBITS VERY GOOD LEVELING PROPERTIES. IT CAN BE APPLIED AT A pH RANGE OF 2.5-6.0.
- \* THE MOTHPROOFING PROPERTIES OF PERIGEN ARE NOT GENERALLY ADVERSELY AFFECTED BY LEVELING AGENTS IN DYE-BATHS.
- \* PERIGEN DOES NOT HAVE A RETARDING EFFECT OF THE DYESTUFF AFFINITY TO WOOL OR WOOL/NYLON BLENDS.
- \* A DURABLE MOTHPROOFING AGENT FOR WOOL AND OTHER PROTEINACEOUS FIBERS.
- \* PERIGEN INDUSTRIAL MOTHPROOFER IS AN INSECTICIDE FOR USE BY PROFESSIONAL OPERATORS FOR THE PROTECTION OF WOOL AND WOOL/POLYAMIDE BLENDS AGAINST WOOL PESTS.
- \* THE PRODUCT CAN BE APPLIED BY SEVERAL METHODS: DYEBATH, AFTER TREATMENT, BATCHWISE OR CONTINUOUS SCOURING OR WASHING (RAW OR FABRIC), YARN IN THE SPINNING LUBRICANT, SPECIALIZED CARPET TREATMENTS, SOFTENER BOWL OF KROY HERCOSETT, REDUCTION BLEACHING

#### **ACTIVE INGREDIENT:**

• (3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (+/-) cis and

max. 65%(+/-) trans.

++ Contains Petroleum Distiliate.

ACCEPTED
with COMMENTS
In EPA Letter Dated

PRECAUCION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente. In EPA Letter Dateds (TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

EPA REG. NO. 432-1153

EPA EST. NO.

### KEEP OUT OF REACH OF CHILDREN CAUTION

FEB 2 0 2003 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide

	FIRST AID . Te	gistered under EPA Reg. No. 432-115 3
IF SWALLOWED:	Call a Poison Control Center or doctor immediately for treatment advice.	432-1153
	• Have person sip a glass of water if able to swallow.	
	• Do not induce vomiting unless told to do so by the poison control center or doctor.	
	• Do not give anything by mouth to an unscious person.	
IF ON SKIN:	Take off contaminated clothing.	
OR 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:	• Hold eye open and rinse slowly and gently with water for 15-20 minutes.	<del></del>
	• 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:	Move person to fresh air.	<del> </del>
	• If person is not breathing, call 911 or an ambulence, then give artificial respiration, preferably by mouth-to-mouth, i	f possible
	Call a poison control center or doctor for further treatment advice.	
	HOT LINE NUMBER	

7577 for emergency medical treatment information.

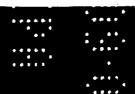
See Side Panel For Additional Precautions

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-334-

**NET CONTENTS:** 

BAYER ENVIRONMENTAL SCIENCE

A Business Group of Baver CropScience LP 95 Chestnut Ridge Road • Montvale, NJ 07645



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 1-800-334-7577.

#### **PRECAUTIONARY STATEMENTS** Hazards To Humans & Domestic Animals

#### **CAUTION**

Harmful if inhaled. Causes eye irritation. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### **Environmental Hazards**

This product is extremely toxic to fish and aquatic invertebrates. 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 cleaning equipment or disposing of equipment washwaters.

#### Physical And Chemical Hazards

Do not use or store near heat or open flame.

#### **DIRECTIONS FOR USE**

SEE TECHNICAL DATA SHEET - PERIGEN INDUSTRIAL MOTHPROOFER. It is a violation of Federal law to use this product in a manner incon-

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Pesticide Storage and Spill Procedures: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

Pesticide Disposal: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by and approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.

CONTAINER DISPOSAL FOR RETURNABLE CONTAINERS: Replace the dry disconnect cap if applicable, and seal all openings which have been opened during use. Return the empty container to a collection site designated by Aventis Environmental Science USA LP. If the container has been damaged and cannot be returned according to the recommended procedures, contact Aventis Environmental Science Customer Service Center at 800-843-1702.

RETURNABLE/REFILLABLE SEALED CONTAINERS: Do not rinse container. Do not empty remaining formulated product. Do not break seals. Return to point of purchase,

#### sistent with its labeling.

Ì

PERIGEN INDUSTRIAL MOTHPROOFER does not stain or color wool. PERIGEN prevents feeding and kills insect pests of wool. Permethrin has a high affinity for wool and does not bind preferentially to polyamide in wool/polyamide blends. For this reason there is no requirement for increased application rates of PERIGEN when treating wool/polyamide blend yarns.

PERIGEN is fast to washing, perspiration, abrasion, shampooing, and dry cleaning. It also provides adequate protection of wool from attack by larvae of:

-moths the brown house moth

the webbing clothes moth casebearing clothes moth

casebearing clothes moth casebearing clothes moth

-carpet beetles

-fur beetles

Hofmanophila pseudospretella

Tineola bisselliella Tinea translucens Tinea pellionella Tinea dubiella Anthrenus flavipes

Anthrenus verbasci Attagenus megatoma

#### **Continuous Scouring or Washing**

The continuous application of PERIGEN is only economical if large quantities of wool are being processed because of the initial charge required in the treating bath. The mothproofing agent should be applied from the last bowl or washbox with no further rinsing. To ensure that PERIGEN is being applied uniformly, it is necessary that the diluted product be added continuously to keep the bath concentration fairly constant.

#### Yarn in the Spinning Lubricant

PERIGEN may be applied in spinning lubricant applied to yarn which is then subjected to steaming. The steaming process should be of at least 8-10 minutes duration at 221°F (105°C).

PERIGEN may be applied in spinning lubricant applied to yarn to be made up into carpet which will be foam backed. In this case the finished carpet will be subjected to the following foam backing sequence of at least 10 minutes duration; steam - precoat - dry - foam application - bake.

#### Specialized Carpet Applications

PERIGEN may be applied to carpets as a spray prior to backing application and as an addition to the print paste. Details are given under Methods of Application.

#### Krov-Hercosett

PERIGEN may be applied from the final softener bowl of the backwashing line (95-194°F or 35-90°C) of the Kroy Hercosett treatment to proof blankets, curtains and car seat covers.

#### METHOD OF APPLICATION

#### Dvebath

- 1. Dilute the product with water and add to the dyebath prior to adding
- 2. Then add the other auxilliaries, acid and dyes. Run in the usual manner.

#### Application for stock, yard, or piece dyeing and yarn setting

The calculated quantity of PERIGEN to give the % o.w.g. for the revel of protection required is added to the dyebath or setting bath after diluting with water at a rate of 1 part PERIGEN to 3 parts water.

The calculated quantity of PERIGEN should preferably be added to the cool bath before immersing the wool or yarn.

PERIGEN may be applied in the dyebath guring loose stock, yarn and piece dyeing.

When fabrics or yarns are to undergo further finishing after dyeing (e.g. tape scouring of stock-dyed carpet yarns, piece scouring stock or yarn dyed upholstery fabrics) PERIGEN should be applied during the finishing process and not during dyeing. If application during dyeing is unavoidable then application rates should be increased by 25%. PERIGEN may also be applied during the dyeing of yarn for carpets which will be chemically washed (to provide a high-lustre finish). However, because the chemical washing procedure removes a propor-

tion of the permethrin applied, higher initial application rates must be adopted.

PERIGEN may also be applied to as little as 20% of yarn intended for carpet manufacture if treatment levels are raised and the treatment yarn is intimately mixed with untreated yarn. This is particularly suitable for dry-spinning operations in which the dyed portion of a berber blend may be overtreated or even blank dyed for the purposes of applying PERIGEN. Fastness achieved in the dyebath is greater than by lubricant application allowing a technically superior result at economic cost.

#### Application for blankets, curtains and car seat covers

PERIGEN is applied in the dyebath after diluting at a rate of 1 part PERIGEN to 3 parts water. The dyebath should be acidified by the addition of 3% on weight of wool (o.w.w.) formic acid 90%. The material is allowed to wet thoroughly at 68°F (20°C) and the diluted PERIGEN then added. The temperature of the dyebath is then raised to the boiling point and held at that temperature for 30 minutes.

#### After treating Bath

- 1. Dilute PERIGEN in water and add to the treatment bath containing the goods at 115°F (46°C).
- 2. Then add X% (o.w.g.) acetic acid, prediluted with water (pH 4-5).
- 3. Run 30 minutes.

The treated fabric does not require a subsequent rinse. The addition of cold water to the treating bath for cooling down does not affect the mothproofing effect.

#### Carpets

PERIGEN may be applied in the final acidification step of chemical washing. The calculated quantity of PERIGEN and acetic acid (1% o.w.g.) are mixed with sufficient water to give a liquid to carpet ratio of 3 parts liquid to 1 part carpet by weight. The liquid is heated to 122°F (50°C) and sprayed onto the carpet. Brush the face of the pile (and occasionally the back of the carpet) for 5 minutes. Allow to stand for 10 minutes and repeat the brushing procedure for 5 minutes. Remove excess water using squeegees and allow to dry.

PERIGEN may also be used as an after-treatment following chemical washing. The carpet should be immersed in water at 68°F (20°C) containing the calculated amount of PERIGEN to give the % o.w.g. for the level of protection required (i.e. 0.3 or 0.45% PERIGEN o.w.g.) using liquid to carpet ratio of 10 parts liquid to 1 part carpet by weight. The liquor should be forced into the carpet by applying frequent pressure to the carpet for a period of approximately 10 minutes. Acetic acid should then be added to the bath at 1% o.w.g. and further pressure applied to the carpet for a period of 20 minutes, turning the carpet occasionally when possible. Remove carpet from treating vessel and remove excess water using squeegees. Allow to dry.

When carbonized goods are to be treated, they have to be neutralized with ammonia to pH 6-7 prior to the PERIGEN application. Residual amounts of the carbonizing acid can cause too fast striking of the PERIGEN

#### Continuous Scouring or Washing

- 1. The last bowl is set with 0.5 g/l (0.07 oz/gal) PERIGEN at a temperature of 1150-1200F (460-490C).
- 2. Subsequent additions are based on the hourly output of wool - 0.5% on the weight of raw wool. The PERIGEN is diluted with water, and this solution is added continuously to the bath during the entire treatment or, if this is not possible, in portions.

#### 3. Example:

A 2,000-pound lot of wool is to be washed and treated with PERIGEN. The hourly output of the continuous washer is 440 pounds. The capacity of the last bowl in the washer is 528 gallons -

Initial Charge: 0.5 g/l = 2.25 pounds PERIGEN/528 gallons

Subsequent Adds: 0.5% of 2,000 pounds = 10 pounds PERIGEN

These adds would be approximately 2 pounds/hour. Dilute this amount to 12 gallons with water and add 1 gallon every 5 minutes unless a continuous feed system is available. The degree of dilution can be varied somewhat, but the higher the dilution, the better for uniformity in adding to the treatment bath.

PERIGEN may also be applied continuous scouring by metered addition. In this process before any yarn is treated, the final bowl should be charged at a rate of 0.3 ml PERIGEN, or 1.2 ml of diluted PERIGEN per liter (4.5 ml diluted per gallon) of liquor volume and thoroughly stirred. The metering device should be filled with diluted PERIGEN and stirred every hour. During the passage of yarn through the bowl the diluted PERIGEN should be metered into the bowl at a rate of 83.5 oz. or 167.3 oz. per 1000 lb. of yarn (equivalent to 0.16 or 0.32% o.w.g.) depending on the level of protection required.

#### Yarn in the Spinning Lubricant

Select a spinning lubricant compatible with PERIGEN.

The quantity of spinning lubricant (usually mixed with water) which is retained by a given quantity of wool during yarn spinning should be calculated.

Select the level of protection required (i.e. 0.16 or 32% o.w.g. for lubricant/steaming treatments, and 0.38% or 0.82% o.w.g. for lubricant treatment followed by foam backing) and then dilute the PERIGEN in the total volume of lubricant so that the volume retained by each batch of yarn after spinning will contain sufficient PERIGEN to give the required % o.w.g.

To optimize the uptake of PERIGEN add a small quantity of acid (e.g. acetic acid) to the spinning solution to obtain a final pH of 5-6. Mix the product in the tank to obtain and keep a homogenous product. If possible, warm the spraying solution to 122 °F (50°C). Treatment of the yarn should then follow normal lubricant application practice.

#### **Specialist Carpet Applications**

PERIGEN may be applied as a spray prior to backing application. This application method may leave a relatively high deposit of active ingredient on the surface of the carpet, the finish of which may therefore be

#### **APPLICATION RATES**

Yarn in dyebath	% o 0.12	w.g.	
	0.1/	A 75	% o.w.g. 0.3
Spray prior to foam backing	0.25	0.25 0. <b>5</b> 3	
Spray prior to toarn backing Printing	0.25	0.31	
Final acidification during chemical washing	0.15	0.45	
After treatment following chemical washing	0.3	0.45	
After treatment following chemical washing	0.3	0.43	
Dyebath	0.13	0.29	0.3
Reduction bleaching	0.22	0.46	
After treatments	0.16	0.77	-
Softener bowl of Kroy Hercosett	0.18	0.39	
Dyebath	0.12	0.25	0.3
Dyebath	0.15	0.31	0.3
Dyebath	0.35	0.75	0.5
•		•	<del>-</del> ··
Spinning Juhricant followed by steaming	N 16	0.32	0.3
			0.5
roam backing	0.30	U.62	V.J
Yarn, stock, piece dyeing/yarn setting	0.12	0.25	0.3
Yarn, stock, piece dyeing/yarn setting, further finishing	0.15	0.31	
Yarn dying - chemical washing	0.35	0.75	
Blankets, curtains and car seat covers	0.13	0.29	
Batchwise or continuous scour	0.16	0.32	0.3
Raw wool scour		0.40	4.2
After treatment following finishing	0.20	0.40	
Yarn - followed by steaming	O 16	0.32	0.3
Yarn - foambacking	0.18	0.82	0.5
	0.75	0.50	
			0.3
After treatment following chemical washing	0.30	0.45	
Reduction bleaching	0.22	0.46	0.3
After treatments	0.16	0.77	
Batchwise or continuous sour	0.16	0.32	0.3
			-
	Dyebath Reduction bleaching After treatments Softener bowl of Kroy Hercosett  Dyebath  Dyebath  Dyebath  Spinning lubricant followed by steaming Foam backing  Yarn, stock, piece dyeing/yarn setting Yarn, stock, piece dyeing/yarn setting, further finishing Yarn dying - chemical washing Blankets, curtains and car seat covers  Batchwise or continuous scour Raw wool scour After treatment following finishing  Yarn - followed by steaming Yarn - foambacking  Spray prior to foam backing Printing Final acidification during washing After treatment following chemical washing	Dyebath Reduction bleaching After treatments Softener bowl of Kroy Hercosett  Dyebath  Dyebat	Dyebath Reduction bleaching Reduction bleaching After treatments         0.22 0.46 0.77 0.16 0.77 0.18 0.39           Softener bowl of Kroy Hercosett         0.18 0.39           Dyebath         0.12 0.25           Dyebath         0.15 0.31           Dyebath         0.15 0.31           Dyebath         0.35 0.75           Spinning lubricant followed by steaming Foam backing         0.16 0.32 0.33 0.82           Yarn, stock, piece dyeing/yarn setting Yarn, stock, piece dyeing/yarn setting, further finishing 0.15 0.31 0.35 0.75 0.35 0.75 0.31 0.29         0.13 0.29           Balchwise or continuous scour Raw wool scour After treatment following finishing         0.16 0.32 0.40 0.40 0.40 0.40 0.40 0.40 0.40 0.4

, j.

1

detrimentally affected. Spraying should be carried out as the carpet is being conveyed to the packing process. Spray nozzles should be set up to give complete coverage across the width of carpet. Nozzles should be selected to provide a coarse spray. The volume of water picked up by a given weight of carpet should first be determined. PERIGEN should then be diluted with water as appropriate to achieve desired application rates at this predetermined pick-up rate. Addition of a small quantity .01% w/v (1 ml/liter) of 80% acetic acid to the emulsion may aid fastness. During the subsequent backing procedure the carpet should pass through the following sequences: steam - precoat - dry - foam back - bake.

PERIGEN may be applied by addition to the print paste. This application method may leave a deposit of active ingredient on the surface of the carpet, the finish of which may therefore be detrimentally affected. It should only be used for all-over print patterns (or if a blank paste containing PERIGEN is used in uncolored areas) and if printing is followed by steaming. Penetration of print paste to the base of the tufts should be ensured.

#### Oxidative/Reductive Bleaching

PERIGEN may be applied during a two part oxidative/reductive bleaching process by addition to the reductive bleaching liquor (eg. stabilized hydrosulphite solution).

#### Horse Hair and Bristles

Treat the loose material for 1 hour at 120° - 130°F (50° -55°C) with 0.3-0.5% (o.w.g.) PERIGEN; pH 4.0-4.5 (acetic acid).

If the loose material is to be dyed, the PERIGEN can be added to the dyebath.

#### **IMPORTANT: READ BEFORE USE**

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer Environmental Science. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: BAYER ENVIRONMENTAL SCIENCE MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer Environmental Science is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. Bayer Environmental Science disclaims any liability whatsoever for special, incidental or consequential damages, resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYEER ENVIRONMENTAL SCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

©Bayer AG, 2002

Bayer Environmental Science A Business Group of Bayer CropScience LP 95 Chestnut Ridge Road Montvale, NJ 07645