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1/6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 7 2002

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ms. Jean Killoren
WPC Brands, Inc.
1 Repel Road
Jackson, WI 53037

Subject: Amendment to Add Marketing Claims and Directions for Use
Repel® Permanone®
EPA Reg. No. 305-55
Your Resubmission Dated February 21, 2002

Dear Ms. Killoren:

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. The subject product is substantially similar to Permanone Insect Repellent (EPA Reg. No. 432-1112; formerly EPA Reg. No. 4816-646). The acute toxicity studies supporting this product are not all category IV, as your letter indicates. According to our files, the acute toxicity profile of Permanone Insect Repellent is as follows:

Table with 4 columns: ACUTE DATA, GRN, TOX CAT., and STUDY CLASSIFICATION. Rows include Acute Oral, Acute Dermal, Acute Inhalation, Primary Eye Irritation, Primary Skin Irritation, and Dermal Sensitization.


Based on this acute toxicity profile, you must include ocular (IF IN EYES) and dermal (IF ON SKIN) First Aid statements on the subject product label. Since the product is classified

in category IV for acute inhalation toxicity, you may delete the inhalation (IF INHALED) statements if you wish. Please note that you may not market some labels with the inhalation statements and some without these statements. All of the marketed labels must have the same precautionary labeling. Accordingly, you must delete the statement in the "KEY" at the end of the label indicating that First Aid statements are optional.

2. You must either delete the statement "Repeat treatment as needed" or revise it to specify a re-treatment interval consistent with supporting efficacy data and residual claims elsewhere on the label. This statement occurs in three sections of the Directions for Use on page 3: "To control Carpet Beetles", "To control Bedbugs" and "To control Fleas (adults and larvae) and Ticks ...".

3. At the end of the first paragraph under "Indoor Application" on page 3, you must add the words "or served". The revised sentence should read "Do not use in commercial food/feed handling establishments, restaurants or other establishments where food/feed is commercially prepared, processed or served."

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

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

Enclosure

For

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## Master Label Repel® Permanone®

### Repel® Permanone®

(all bullet points are optional marketing claims)

- ❖ For Control of Fleas, Brown Dog Ticks and Lice [on Premises] [on Dogs]
- ❖ Controls Fleas and Ticks on dogs for 14 days
- ❖ For control of ticks which may cause Lyme disease.
- ❖ Provides 60-day [two months] control of cockroaches
- ❖ Provides 60-day [two months] control of fleas on surfaces.
- ❖ For Domestic use both indoors and outdoors.
- ❖ For use around doors, windows, screens, patios, and porches.
- ❖ Insect Repellent For Clothing
- ❖ For Treatment of Dog Bedding
- ❖ For Treatment of Upholstered Furniture
- ❖ For Treatment of Nets, Tents, Sleeping Bags and Backpacks
- ❖ Contains Permanone
- ❖ Controls Fleas & Ticks
- ❖ Repels and Kills Mosquitoes, Ticks, and Mites
- ❖ Repels and Kills Ticks which May Carry Lyme Disease and Rocky Mountain Spotted Fever
- ❖ Provides Long-Lasting Protection 1 Treatment Lasts 2 Weeks
- ❖ Unscented Two-Week Protection Repels and Kills Mosquitoes, Ticks and Mites
- ❖ CLOTHING & GEAR INSECT REPELLENT - DO NOT APPLY TO SKIN
- ❖ CLOTHING TREATMENT ONLY - DO NOT APPLY TO SKIN
- ❖ 3 ounce can will treat one complete outfit
- ❖ For Control of Garden Insects on Ornamental Plants

#### KEEP OUT OF REACH OF CHILDREN

**CAUTION:** See back panel for precautions.

#### ACTIVE INGREDIENT:

\*Permethrin .....0.5%

OTHER INGREDIENTS: .....99.5%

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

EPA Reg. No. 305-55    EPA Est. No. 3657-WI-2  
Net Contents:    oz. ( ml)

Made in the USA for:                    1-800-558-6614  
WPC Brands, Inc.                        www.wpcbrands.com  
Jackson, WI 53037

### PRECAUTIONARY STATEMENTS

#### Hazards To Humans & Domestic Animals

**CAUTION:** Harmful if absorbed through skin. Avoid contact with face, eyes, or skin. Avoid breathing vapors or spray mist. Do not allow contact with treated surfaces until spray has dried. Wash thoroughly with soap and water after handling and before eating or smoking. Do not allow spray to contact food, or water supplies.

### 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.

#### IF ON SKIN:

- Rinse skin immediately with plenty of water for 15-20 minutes.

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

### PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Exposure to temperatures above 130°F may cause bursting.

#### 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 [www.cleanup.org] for disposal instructions.

Permanone is a registered trademark of the Aventis Group. Repel is a registered trademark of WPC Brands, Inc.

Buyer assumes all responsibilities for safety and use, not in strict accordance with directions.

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated**

**MAR 7 2002**

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

4/6

## Master Label Repel® Permanone®

### DIRECTIONS FOR USE

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

#### SHAKE WELL BEFORE USING

*(One or more of the following directions must be on the label. Directions must be in agreement with the marketing claims.)*

#### • **GENERAL CLOTHING INSTRUCTIONS:**

This product must not be applied to clothing while it is being worn. Under no circumstances should bare skin or clothing on the body be treated.

For protection against ticks (including those, which may carry Lyme disease), chiggers and mosquitoes, apply product as directed below. For further protection, use in conjunction with an insect repellent registered for direct application to the skin and utilize the following primary preventive measures. Avoid walking in areas where the pests are found, wear appropriate protective clothing (light-colored, long-sleeved shirt and long pants tucked into socks) and inspect body daily for ticks. Pant cuffs should be worn inside the socks or footwear to ensure full protection against ticks and chiggers.

#### INITIAL TREATMENT INSTRUCTIONS:

1. Select a well-ventilated outdoor area protected from wind and lay out [or hang] the clothing to be treated (as complete outfit; shirt, pants [trousers] and socks).
2. Hold container about 6-8 inches from surface of the clothing and spray with a slow sweeping motion to lightly moisten the entire surface of the fabric.
3. Continue spraying over entire outfit, until a total treatment time of 60 seconds has elapsed and the outer surface of the fabric is moist enough to cause a slight color change or darkening. Pay special attention to socks, trouser [pant] cuffs and shirt cuffs.
4. Turn the clothing over and treat the other side as described in Steps 2 & 3.
5. Hang the treated clothing and allow to dry for at least 2 hours (4 hours under humid conditions) before wearing.
6. Three ounces will treat one complete [an average] outfit. Do not exceed recommended spraying times.

#### INITIAL TREATMENT INSTRUCTIONS ON NETS, TENTS, SLEEPING BAGS AND BACKPACKS:

Do not treat inside of sleeping bag. Spray exterior surfaces of tent only.

Select a well-ventilated outdoor area protected from wind and lay out [or hang] article to be treated. Hold container upright about 6 -8 inches from surface of the article and spray with a slow sweeping motion to lightly moisten the surface of the fabric. Continue spraying over entire article, until the outer surface of the article is moist enough to cause a light color change or darkening. Turn the article over and treat the other side as described above. Hang the treated article and allow to dry for at least 2 hours (4 hours under humid conditions) before using.

#### RETREATMENT INSTRUCTIONS:

This product contains an active ingredient, which actually binds to the fabric being treated, providing residual protection, which lasts a minimum of two weeks, and holds up through several machine washings. DO NOT RETREAT CLOTHING MORE THAN ONCE EVERY TWO WEEKS. LAUNDRER CLOTHING AT LEAST ONCE BEFORE RETREATING. For retreatment, follow instructions for initial treatment.

#### • **DOG, DOG BEDDING AND PREMISES:**

**On Dogs:** To control Fleas, Ticks and Lice: Start spraying at the tail, moving the dispenser rapidly and making sure that the animal's entire body is covered, including the legs and under body. While spraying, fluff the hair so the spray will penetrate to the skin. Make sure spray wets thoroughly, but do not saturate animal. Do not spray into eyes or face. Avoid contact with genitalia. Use protective gloves or mitts when applying product. Repeat application every two weeks if necessary. DO NOT USE ON CATS OR KITTENS. 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 products for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amount of water. If signs continue, consult a veterinarian immediately.

#### To control fleas and ticks on pet bedding, premises and upholstered furniture.

Fleas and Ticks (Adults and Larvae): thoroughly clean or launder pet bedding before treatment. Spray bedding, sleeping quarters, floor coverings and floors, paying special attention to cracks and crevices.

Upholstered furniture may also be treated to control fleas and ticks in these areas. A test application should be made to upholstery in an inconspicuous place before use. Spray upholstery paying particular attention to tufts and seams. Allow to dry before reuse.

## Master Label Repel® Permanone®

### • OUT DOOR APPLICATION

To control ticks, mosquitoes, chiggers and mites use as a residual treatment. For each area listed below, apply until surface is wet.

Treat around windows and doors, porches, screens eaves, patios, garages, under stairways and in crawl spaces where these pests [ticks] may enter.

Treat a band of vegetation and leaf litter 6 to 10 feet wide around the outside of building to help control pests [ticks] from occurring there.

To help control pest [ticks] in outdoor activity areas, treat a band of vegetation and leaf litter 6-10 feet wide and adjacent to activity areas, especially where dense vegetation occurs.

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### • INDOOR APPLICATION

For spot application only. Do not use as a space spray indoors. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food/feed should be covered or removed. Do not use in commercial food/feed handling establishments, restaurants or other establishments where food/feed is commercially prepared or processed.

For protection against ticks, chiggers, fleas and mosquitoes: Spray around windows, doors, porches, patios, and screens until surface area is damp.

#### SURFACE SPRAYING:

For 60-day [Two months] control of **Cockroaches, Waterbugs, Palmetto Bugs, Scorpions, Millipedes,**

**Centipedes, Sowbugs, Pillbugs, Ants, Silverfish, Firebrats, Spiders, Crickets, Clover Mites, Cheese Mites, Granary Weevils, Rice Weevils, Confused Flour Beetles, Rust Red Flour Beetles, Drugstore Beetles, Meal Worms, Grain Mites and Cadelles:**

Direct the spray into hiding places, cracks and crevices, and behind shelves and drawers. For **silverfish**, spray bookcases. For **ants**, spray trails, nests and points of entry.

To control **Carpet Beetles**: Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving. Repeat treatment as needed.

#### To control **Bedbugs**:

Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints.

Treat baseboards, molding and floors. Repeat treatment as needed.

To control **Fleas (adults and larvae) and Ticks**, including Ticks which may carry Lyme disease (adults and larvae): Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames and entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. Repeat treatment as needed. Allow to dry thoroughly before allowing pets to contact treated areas.

#### To control **Clothes Moths**:

Remove any 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, infested articles may be treated lightly. A test application should be made to fabric in an inconspicuous place before use.

#### To kill **Lice and Louse Eggs**:

**NOT FOR USE ON HUMAN HAIR.** Spray fabric in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying then proceed to spray entire area to be treated. Spray from a distance of 8 to 10 inches. Treat only those garments and parts of bedding, including mattresses and furniture that cannot be either laundered or dry-cleaned. Allow all treated articles to dry thoroughly before use.

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6/16

## Master Label Repel® Permanone®

• **FOR CONTROL OF GARDEN INSECTS ON ORNAMENTAL PLANTS:**

Spray may damage certain plants. When spraying insects resting on vegetation, first test a few leaves and check after a week for signs of damage. Lightly spray from approximately 18 inches so as to avoid over wetting leaves. Use a sweeping motion. Do not spray flowers directly. 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 infestation occurs.

For use on roses, dahlias, asters and other ornamentals to kill **Japanese Beetles** hit by sprays as well as **Whiteflies, Aphids, Exposed Thrips, Spiders, Red Mites and Leafminers**. 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.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, dahlias, delphiniums, dogwoods, English ivy, eunonymus, fuschia, geraniums, crassula, grape vines, Kentia palms, laurels, marigolds, rhododendrons, rose, rubberplants, 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 Armyworms**.

Not for use on plants grown for sale or other commercial or research purposes. Not for use in commercial greenhouses.

### KEY

All items in boxed areas must be present on the label.

First Aid statements should be in a solid box or presented in an easy to use fashion.  
First Aid statements are optional for this product, but are strongly advised to be on the label.

❖ Optional marketing text

[Optional language [text]]

New text 2/20/02