



305-55

5-22-2003

1-6

See read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number Repel Permanone 305-55	2. EPA Product Manager George La Rocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) WPC Brands, Inc.	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) WPC Brands, Inc. 1 Repel Road Jackson, WI 53037 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	<b>NOTIFICATION</b>  <b>MAY 2 2 2003</b>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

**Explanation: Use additional page(s) if necessary. (For section I and Section II.)**

Notification of marketing claim "Permethrin Aerosol Spray" per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

### Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jean Killoren	Title Regulatory Coordinator	Telephone No. (Include Area Code) 800/ 558-6614 x 115
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		<b>6. Date Application Received</b>  <b>(Stamped)</b>
2. Signature 	3. Title Regulatory Coordinator	
4. Typed Name Jean Killoren	5. Date 5/8/03	

# Master Label Repel® Permanone®

**NOTIFICATION**  
MAY 22 2003

## Repel® Permanone®

(all bullet points are optional marketing claims)

- ❖ [REDACTED]
- ❖ For Control of Fleas, Brown Dog Ticks and Lice [on Premises] [on Dogs]
- ❖ Protects your dog from ticks, fleas mosquitoes and lice for 35 days.
- ❖ Controls Fleas and Ticks on dogs for 35 days
- ❖ Aids in Control of ticks on Dogs for an additional 2 weeks.
- ❖ 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

[REDACTED]  
[REDACTED] (Do not apply to skin)

- ❖ 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.

Net Contents: oz. ( g)

## Back labeling

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

**CAUTION:** Causes moderate eye irritation. Harmful if absorbed through the skin. Avoid contact with face, eyes, or skin. Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco or using the toilet.

**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.

Call a poison control center or doctor for further treatment advice. Have the product container 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 Bayer AG.  
 Repel is a registered trademark of WPC Brands, Inc.

EPA Reg. No. 305-55  
 EPA Est. No. 3657-WI-2 or 9688-MO-1  
 Made in the USA  
 WPC Brands, Inc.  
 Questions or Comments?  
[www.wpcbrands.com](http://www.wpcbrands.com)

Manufactured for:  
 Jackson, WI 53037  
 1-800-558-6614

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

## Master Label Repel® Permanone®

### READ ENTIRE LABEL BEFORE EACH USE

*(Must be at the top of the first side or back panel in bold and capital letters.)*

### 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

Do not allow contact with treated surfaces until spray has dried. When using product do not allow spray to contact food, or water supplies.

*(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.

#### RE-TREATMENT 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. LAUNDRY CLOTHING AT LEAST ONCE BEFORE RETREATING.** For re-treatment, follow instructions for initial treatment.

## Master Label Repel® Permanone®

### DOG, DOG BEDDING AND PREMISES:

**USE ONLY 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.

### • 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, processed or served.

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 infestation occurs but not more than once every two weeks.

### 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 infestation occurs but not more than once every two weeks.

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 infestation occurs but not more than once every two weeks. 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 storage's 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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CORPORATE OFFICE

262-677-4121 | FAX: 262-677-9006

1 REPEL ROAD • P.O. BOX 198  
JACKSON, WI 53037

6-6

May 8, 2003

George LaRocca  
Document Processing Desk (NOTIF)  
U.S. EPA-Office of Pesticide Programs (7504C)  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

VIA: FED EX  
703/305-5218

RE: Repel Permanone, EPA Reg. No. 305-55  
Label notification per PR-Notice 98-10

Dear Mr. LaRocca:

WPC is submitting a label notification to add the following marketing claim:  
"Permethrin Aerosol Spray".

The above claim is being added to help the consumer differentiate between our pump spray, Repel Permanone Permethrin Trigger Spray, EPA Reg. No. 305-60 and our aerosol spray, Repel Permanone, EPA Reg. No. 305-55.


In addition we are re-arranging existing optional marketing text from our current stamped accepted label to read:

"CLOTHING & GEAR INSECT REPELLENT Two Week Protection (Do Not Apply To Skin)".

We have enclosed 3 copies of the proposed label along with a copy of the most current stamped accepted label from November 6, 2002. If you have any questions please give me a call at (800) 558-6614 ext. 115 or e-mail at [jkilloren@wpcbrands.com](mailto:jkilloren@wpcbrands.com).

Sincerely,

WPC BRANDS, INC.

  
Jean Killoren  
Regulatory Coordinator

Enc.