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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 6, 2012

Jessica Goldberg
WPC Brands, Inc
P.O. Box 4406
Bridgeton, MO 63044

Subject: Amended Reregistration Label
Product Name: Repel Permanone[®]
EPA Registration Number: 305-55
EPA Decision Number: 413468

Dear Ms. Goldberg:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the permethrin RED, and has concluded that your submission is acceptable.

NOTE: This product is not being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself, and can be added by non-notification per PRN 98-10.

Please note that the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSFs are superseded.

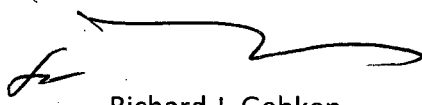
- Basic CSF, dated February 24, 2010
- Alternate CSF #1, dated February 24, 2010

A copy of your label stamped "Accepted" is enclosed along with copies of the acute toxicity and product chemistry reviews completed for the subject product. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever

occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

If you have any questions about this letter, please contact Richard Gebken at (703) 305-6701 or via e-mail at gebken.richard@epa.gov or Jennifer Gaines at (703) 305-5967 or via e-mail at gaines.jennifer@epa.gov.

Sincerely,



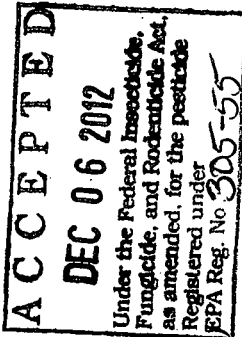
Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

*Enclosures: Label stamped "Accepted," dated December 6, 2012
Acute Toxicity Review, dated May 16, 2012
Product Chemistry Review, dated April 30, 2012*

REPEL®

Permanone®

(all bulleted points are optional marketing claims)



- Permethrin Aerosol Spray
- 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
- Clothing & Gear Insect Repellent Two Week protection (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

ACTIVE INGREDIENT:

Permethrin	0.5 %
OTHER INGREDIENTS	99.5 %

Keep Out of Reach of Children. **DO NOT USE ON CATS.**

CAUTION. See back panel for precautions

NET WT __ FL OZ (__ ml)

[Bracketed text – Optional]

STOP. READ ENTIRE LABEL BEFORE EACH USE

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

Use Restrictions (Note to reviewer: Text within { } area will only be used on products that contain Outdoor Uses)

{Do not allow contact with treated surfaces until spray has dried.

When using product do not allow spray to contact food, or water supplies.

Do not water the treated area to the point of run-off.

Do not make applications during rain.

All outdoor applications must be limited to spot or crack-and-crevice treatments only. Except for the following permitted uses:

- 1- Treatment to soil or vegetation around structures

All outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.

Not for use in outdoor residential misting systems.

Do not apply this product in a way that will contact adults, children or pets, either directly or through drift.}

Except when applying to pets or livestock, do not allow adults, children, or pets to enter the area until sprays have dried.

Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

(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 layout [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 layout [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 retreatment, follow instructions for initial treatment.

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. Do not contact 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:

Use Restrictions:

Except when applying to pets or livestock, do not allow adults, children, or pets to enter the area until sprays have dried. Remove pets, birds, and cover fish aquariums before use.

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 Cadellies:** 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 mgs. 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.

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.

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 zmmas

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.

STORAGE AND DISPOSAL

Pesticide Storage: Store in a cool, dry area, inaccessible to children and away from heat or open flame. **Pesticide Disposal and Container Handling:** 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 for disposal instructions.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

DO NOT USE ON CATS. May be toxic or potentially fatal if applied to or ingested by cats. Accidental application to cats and/or grooming a recently treated dog may result in tremors and/or uncoordinated muscle movements. If this occurs, immediate veterinary care should be provided.

(Note to Reviewer: Cat slash icon to be included in the shaded box or other area on the label)

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 eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

the product container with you when calling a Poison Control Center or doctor, or going for treatment. You may also contact 1-800-zzzz-zzzz for emergency medical treatment information.

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.

Environmental Hazards (to be included only on labels that contain Outdoor Directions)

This pesticide is extremely toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas. See Directions for Use for additional precautions and requirements.

This pesticide is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming drops or weeds while bees are actively visiting the treatment area.

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

[Questions or comments?] Call 1-888-880-1181 or www.wpcbrands.com

Made for
WPC Brands, Inc.
P. O. Box 4406
Bridgeton, MO 63044

EPA Est. No. 9688-MO-1

EPA Reg. No. 305-55

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