

JAN 15 1998

Ms. Sharon M. Johnston
AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

Dear Ms. Johnston:

Subject: Amendment- new acute toxicity data
Pramex Insecticide EC 13.3% for use on plants
EPA Registration Number 432-553
Pramex Insecticide Emulsifiable Concentrate 13.3%
EPA Registration Number 432-554
Pramex Insecticide EC 13.3% Formula I for repackaging use
EPA Registration Number 432-724
Your submission dated August 14, 1997

This is a followup letter to the Agency's letter dated September 19, 1997.

This amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable, provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. Under Statement of Practical treatment change "Call a doctor or get medical attention." to "Call a physician or Poison Control Center."

b. The proposed label should contain a Note to Physician. Some suggested types of information include the following: technical information or symptomatology; use of supportive treatments to maintain life functions; medicine that will counteract the specific physiological effects of the pesticide; and company telephone number to specific medical personnel who can provide specialized medical advice. Also add "Probable mucosal damage may contraindicate the use of gastric lavage."

ACUTE TOXICITY REVIEW

STUDY	MRID	CATEGORY	CLASSIFICATION
Acute Oral	44354901	IV	Acceptable
Acute Dermal	44354902	IV	Acceptable
Acute Inhalation	44354903	IV	Acceptable
Eye Irritation	44354904	I	Acceptable
Dermal Irritation	44354905	IV	Acceptable
Dermal Sensitization	44354906	Sensitizer	Acceptable

A copy of the review is enclosed.

3. Submit two (2) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

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PRAMEX[®] INSECTICIDE

EMULSIFIABLE CONCENTRATE 13.3%
FORMULA I

- * FOR USE ON PLANTS
- * CONTAINS 1 lb/gal (120 g/L) OF PRAMEX INSECTICIDE
- * FOR USE OUTDOORS AROUND BUILDINGS, HOMES, IN SMALL FLOWER AND VEGETABLE GARDENS, AND ON FRUIT, NUT AND ORNAMENTAL TREES
- * WATER BASED LOW ODOR FORMULA
- * ECONOMICAL, 8 OZ. MAKES UP TO 48 GALLONS
- * USE ON LAWNS, GARDENS AND FRUIT TREES

ACTIVE INGREDIENTS:

*†‡Permethrin (3-phenoxyphenyl)methyl (±) cis, trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate 13.30%w/w
 **INERT INGREDIENTS:.....86.70%w/w
 100.00%w/w

**Contains Aromatic Petroleum Solvent.
 *Cis/trans isomers ratio: min. 35% (±) cis and max. 65% (±) trans.
 †U.S. Patent No. 4,024,163
 ‡AgrEvo Environmental Health Inc.'s PrameX[®] brand of permethrin insecticide.
 PRAMEX is a registered trademark of AgrEvo Environmental Health, Inc.

PRECAUCION AL CONSUMIDOR: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
 (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. 432-553 EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of skim milk, egg whites, gelatin solution, or, if these are not available, large quantities of water. Avoid alcohol. This product contains aromatic petroleum solvent. Aspiration may be a hazard.

See Side Panel For Additional Precautionary Statements
 ACCEPTED with COMMENTS
 EPA Letter Dated

JAN 15 1998
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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

553s.081497In

432-553

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

DANGER
 Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear safety glasses. 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 clothing before reuse. Do not use in food handling areas.

Environmental Hazards

This product is extremely toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply directly to water. Apply this product only as specified on this label.

Physical And Chemical Hazards

Do not use or store near heat or open flame. Flashpoint minimum of 105°F (41°C).

DIRECTIONS FOR USE

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

STORAGE & DISPOSAL

Storage: Do not store at temperatures below 40°F (4.5°C). If this material has been exposed to temperatures below 40°F (4.5°C), there may be precipitation. Check for crystallization. If evident, warm to 80°F (26.5°C) and thoroughly mix before using. **DO NOT USE OPEN FLAME.** Store product in original container in a locked storage area.
Container Disposal: Do not reuse empty container. Wrap container and put in trash.

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or ornamental gardens or parks or on golf courses or lawns and grounds.

For use on ornamental plants, mix PrameX EC[®] with water in the following manner:

FINISHED SPRAY	PRAMEX EC [®]	WATER
0.015%	1 teaspoon (5 ml)	1 gallon (3.79 L)

*Note: Do not use more PrameX EC than recommended, as this may cause some plant injury. Use this dilution unless other instructions are given.

CONTACT AND RESIDUAL SPRAY- Apply a finished spray of PRAMEX Emulsifiable Concentrate. USE SUFFICIENT SPRAY TO OBTAIN FULL COVERAGE OF ALL FOLIAGE. ADJUST SPRAY VOLUME USED TO PLANT SIZE.

HOUSEPLANTS: To protect plants in indoor landscaping - Spray directly on insects to kill *Leafrollers, Armyworms, Cutworms, Cabbage Worms* on chrysanthemums; *Fungus Gnats* on velvet plants. Spray as directed above. Spray as directed above to control *Aphids, Armyworms, Corn Earworms, Fallcankerworms, Inchworms, Japanese Beetles, Leafminers, Leafrollers, Mealybugs, Scales, Spider Mites, Spring Cankerworms, Exposed Thrips, and Whiteflies* on the following plants:

Ageratum	English ivy	Poinsettia
Ardisia	Fuchsia	Portulaca
Aster	Gladiolus	Pothos
Azalea	Grape ivy	Prayer Plant
Baby's breath	Hypoestes	Purple Passion
Begonia	Ivy	Rabbits foot fern
Birds-nest fern	Juniper	Rose
Bleeding heart	Lily	Schefflera
Carnation	Marigold	Snapdragon
Chrysanthemum	Orchid	Snake Plant
Coleus	Palm	Statice
Crown of Thorns	Pansy	Velvet Plant
Cockscomb	Piperomia	Verbeha
Cyclamen	Petunia	Zinnia
Dracaena	Philodendron	
Dumbcane	Piggy-back plant	

Remove infested plants from living areas prior to application. Spray plants outside in an area not likely to be occupied by children or pets (particularly fish). When leaves dry, plants can be returned to original location.

Use with care on ferns, palms and fuchsia. As with all plants listed above, especially carnations, chrysanthemums, and roses, there exists a wide variety of species and cultivars, and therefore, a wide variety of susceptibility to injury. To ascertain possible phytotoxicity, spray a few plants as described above, wait 24 hours, and check for possible injury.

Repeat applications may be necessary to control citrus blackflies on non-bearing citrus; adult Japanese beetles on roses.

OUTDOOR ORNAMENTALS: Use one teaspoon of PRAMEX in one gallon of water.

CONTACT AND RESIDUAL SPRAY- Apply a finished spray of PRAMEX® Emulsifiable Concentrate. USE SUFFICIENT SPRAY TO OBTAIN FULL COVERAGE OF ALL FOLIAGE. ADJUST SPRAY VOLUME USED TO PLANT SIZE.

Spray in the late afternoon or evening, when the temperature ranges from 50°F to 75°F and when there is little or no wind.

Spray at the first indication of insect pests. On those plants that will flower during the season, the spray schedule should be completed before blossom formation. Repeat as necessary; use intervals of 4 to 8 days. PRAMEX application can be made up to the day of collection.

Spray as directed above to control *Aphids, Cicadas, Corn Earworms, Fall Cankerworms, Inchworms, Leafminers, Leafrollers, Mealybugs, Bagworms, Spider Mites, Exposed Thrips and Whiteflies* on the following plants:

Ageratum	Gladiolus	Pea shrub
Arizona Cypress	Gold bells	Petunia
Aster	Hypoestes	Philodendron
Azalea	Ivy	Poinsettia
Begonia	Lilac	Rhododendron
Coleus	Marigold	Rose
common ninebark	Mock Orange	Snapdragon
Common Snowberry	Nannyberry	Taxus
Elm	Orchid	Wax plants
Exacum	Palm	Weeping fig
Euonymous	Pansy	Zinnia
English Ivy		

FOR ORNAMENTAL TREES GROWN AROUND THE HOME Use sufficient spray to obtain full coverage of all foliage. Avoid heavy wetting. Use to control: *Pine Moths, Pine Needle Miners, Pine Beetles And Needle Scales* on pine; *Budworms* on conifers; *Oakworms* on oak; *Fall Webworms* on cherry, elm and honeysuckle; *Aphids* on tulip poplar; *Citrus black flies* on non bearing citrus; *Tussock Moths* on Douglas and grand firs; *Leafminers* on birch; *Elm Leaf Beetle* and *Elm Spanworms* on elms.

TO KILL TENT CATERPILLARS: Application should be made when caterpillars are young and tents are first noticed. For best results, apply in the late afternoon or evening, when caterpillars have returned to their tents. Mix 2 fl oz (59 ml) of this product in one gal (3.79 L) of water. Wet tents with spray on all sides. A few caterpillars may be seen escaping from the tent; however, they should die within several hours.

CLUSTER FLIES: Apply this product undiluted to the outside surfaces of buildings at the rate of 2.5 fl oz/1000 sq ft (74 ml/93m²). Use apparatus which delivers a strong mist spray of small particle size. Hold nozzle about three feet (or 1 meter) from surface to be treated. Apply when wind velocity is less than 2 mph (3.2 kph) to avoid drift.

TICKS (Lone Star, Deer, Black Legged), FLEAS, CRICKETS, AND EARWIGS: For treatment of localized infestations of these insects in outdoor areas where there are weeds or bushy non-crop areas. Mix 1 1/3 ounces of Pramex in 1 quart of water (or 5 1/3 ounces per gallon) and spray infested areas thoroughly.

FOR USE ON LAWNS

For control of *Ants (including Fire Ants), Armyworms, Chinch Bugs, Crickets, cutworms, Japanese Beetle Grubs, Grasshoppers, Mole Crickets and Sod Webworms*, consult the following chart:

PESTS	DILUTION
Armyworms	5 tsp/10 gal water/1000 ft ²
Cutworms	(25 ml/38 L water/93m ²)
Chinch bugs	
Japanese beetle grubs	
Mole crickets	
Sod webworm	
Crickets	2 tsp/3 gal water/1000 ft ²
Grasshoppers	(10 ml/11.4 L water/93m ²)
Ants (including Fire Ants)	

Lawns should be no taller than 3 inches (7.6 cm) at time of application. Slightly more water may be used as long as the amount of product per area is as listed above. For heavy infestations, repeat application after two weeks.

Also for control of *Cutworms* on dichondra and Irish moss. Use as directed above for lawns.



DIRECTIONS FOR USE OF PRAMEX 13.3 EC FOR GROUND APPLICATION ON VEGETABLES:
 For Backyard Vegetable Gardens Only

Prepare Pramex spray mix as directed in the following chart.

Use 0.25 gallons of finished spray per 110 square feet or one liter per 10.7 square meters of surface area.

Vegetable	Target Pest(s)	Remarks	Recommended Pramex Dilution Finished Spray	Use Rate tsp/gal ml/liter
Asparagus (pre-harvest)	Cutworm, Asparagus Beetle	Apply for uniform coverage as needed. Do not apply more than 4 applications per crop. Can be applied up to 3 days prior to harvest.	4tsp/5gal.	1
(Post-harvest)	Larval stages of Asparagus Beetle, Tarnished Plant Bug, Lygus Bugs, and Adult Japanese Beetle.	Treat ferns or bush growth after spear harvest when insects are present.	4tsp/5gal.	1
Celery	Vegetable Leaf Miner, Cabbage Looper, Black and Granulate Cutworm, Fall , Beet and Southern Armyworm	Apply every 3-5 days or as needed. Can be applied up to 3 days prior to harvest. Do not make more than 10 applications per season.	1.5tsp/1 gal.	2
Cole Crops: Broccoli Brussels Sprouts Cabbage Cauliflower	Beet Armyworm, Diamond Back Moth, Imported Cabbageworm, Cabbage-aphid, Cabbage Looper	Apply every 5 days or as needed. Can be applied up to one day prior to harvest. Do not make more than 8 applications on Cauliflower, Brussels Sprouts and Broccoli and 10 applications on Cabbage.	4tsp/5gal.	1
Eggplant	Colorado Potato Beetle, Vegetable Leaf Miner	Apply for uniform coverage as needed. Do not exceed 16 applications. Can be applied up to 3 days prior to harvest.	1.5tsp/1 gal.	2
Horseradish (Spring Preplant Dip)	Imported Crucifer Weevil	Soak sets for 30 minutes in 0.1% solution and air dry before planting.	6.5tsp/1gal.	8.4
(Foliar application)	Imported Crucifer Weevil	Apply as needed. Do not exceed 3 foliar applications. Can be applied up to 22 days prior to harvest.	1.5tsp/1 gal.	2
Head Lettuce only (Do not use on Leaf Lettuce)	Cabbage Looper, Alfalfa Looper, Beet Armyworm, Corn Ear Worm and Tobacco Budworm	Apply every 5-10 days as needed. Do not make more than 10 applications per season. Can be applied up to 1 day prior to harvest.	1.5tsp/1 gal.	2
Potatoes	Beet Armyworm, Colorado Potato Beetle, Potato Leafhopper, Potato Flea Beetle, Aster Leafhopper, Potato Aphid, Potato Tuberworm, Cabbage Looper, Cutworms, European Corn Borer, Potato Psyllid, Tarnished Plant Bug	Apply as needed. Do not apply more than 12 applications. Can be applied up to 7 days prior to harvest.	1.5tsp/1 gal.	2
Peppers	Vegetable Leafminer, Cabbage Looper, Fleabeetle, Corn Earworm, Pepper Weevil, European Corn Borer	Apply as needed, but not more than 8 sprays per season. Can be applied up to 3 days prior to harvest.	1.5tsp/1gal.	2
Spinach	Beet Armyworm, Corn Earworm, Cabbage Looper, Cutworms, European Corn Borer, Green Cloverworm and Leafhoppers	Apply for uniform coverage when needed but not more than 7 applications per season. Can be applied up to 7 days prior to harvest.	4tsp/5gal.	1

DIRECTIONS FOR USE OF PRAMEX 13.3 EC FOR GROUND APPLICATION ON VEGETABLES:

For Backyard Vegetable Gardens Only

Prepare Pramex spray mix as directed in following chart.

Vegetable	Target Pest(s)	Remarks	Recommended Pramex	
			Dilution Finished Spray	Use Rate tsp/gal ml/liter
Sweet Corn	Corn Earworm, European Corn Borer, Fall Armyworm, Southern Armyworm	Apply every 5 days and when needed but not more than 6 applications per season. Can be applied up to 1 day prior to harvest.	1.5tsp/1 gal.	2
Tomatoes Do not apply on cherry tomatoes and varieties yielding tomatoes less than one inch in diameter.	Beet and Southern Armyworm; Tomato Pinworm, Tomato Fruitworm, Horn Worms, Granulate Cutworms, Colorado Potato Beetle, Cabbage Looper	Apply for uniform coverage when needed but not more than 6 applications per season. Can be applied up to date of harvest.	1.5tsp/1 gal.	2

DIRECTIONS FOR HOME OWNER - BACKYARD USE OF PRAMEX 13.3 EC FOR TREE FRUIT AND NUT CROPS GROWN AROUND THE HOME

For Ground Application Only

Apply finished spray to trees until foliage is dripping wet. Application rate is based on dwarf and semi-dwarf sized fruit trees requiring 130 gallons/acre to runoff.

Trees (Fruit or Nut)	Target Pest(s)	Remarks	Recommended Pramex	
			Dilution Finished Spray	Use Rate tsp/gal ml/liter
Almonds	Navel Orange Worm, Peach Twig Borer	Apply when insects appear. Do not make more than 2 applications during hull split and 5 applications per season. Can be applied up to 7 days prior to harvest.	2.2tsp/1 gal.	3
Apples	Plum Curculio, Redbanded Leafroller, Rosyapple Aphid, Spotted Tentiform Leafminer, Tarnished Plant Bug, White Apple Leafhopper, Obliquebanded Leafroller, Green Fruitworm	Apply when insects appear. Repeat as required to maintain control. Do not make more than 3 applications per season. Do not apply after petal fall.	2.2tsp/1 gal.	3
Peaches	Lesser Peachtree Borer, Peach Twig Borer, Plum Curculio, Tarnished Plant Bug, Green Fruit Worm, Oriental Fruit Moth	Apply when insects appear. Do not apply within 7 days of harvest. Do not make more than 8 applications per season.	2.2tsp/1 gal.	3
Pears (dormant through delayed dormant)	Pear Psylla	Apply during the dormant through delayed dormant growth period only. Add if desired 8 oz. of spray oil to each gallon of Pramex End Use Spray. Do not make more than 2 applications per season.	2.2tsp/1 gal.	3
(summer)	Pear Psylla, Green Fruitworm, and Codling Moth	Apply when needed. Do not apply more than 3 applications per season. Can be applied up to 14 days prior to harvest.	2.2tsp/1 gal.	3

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

AgEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

