

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."

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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

PRAMEX® INSECTICIDE EMULSIFIABLE CONCENTRATE 13.3% FORMULA I

- * CRAWLING INSECT SPRAY
- * AN INSECTICIDE OFFERING RESIDUAL KILL OF CRAWLING INSECTS FOR UP TO 4 WEEKS
- * CONTAINS 1 lb/gal (120 g/L) OF PRAMEX INSECTICIDE
- * INDUSTRIAL, INSTITUTIONAL AND COMMERCIAL USE

ACTIVE INGREDIENTS:

*†‡Permethrin (3-phenoxyphenyl)methyl (±) Cis,
trans-3-(2,2-dichloroethenyl)-2,2-dimethyl-
cyclopropanecarboxylate 13.30%w/w

INERT INGREDIENTS:£ 86.70%w/w
100.00%w/w

*Cis/trans isomers ratio: min. 35%(±)cis and max. 65%(±)trans.

†U.S. Patent No. 4,024,163

‡AgrEvo Environmental Health's PrameX® brand of permethrin insecticide.

£Contains Petroleum Distillates.

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. 432-554

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, drink 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
in EPA Letter Data NET CONTENTS

JAN 15 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
554s 081597 is amended, for the pesticide
registered under EPA Reg. No.

432-554

PRECAUTIONARY STATEMENTS

Hazards To Humans & Domestic Animals

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear (goggles or face shield). 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. Do not apply this product in hospital patient rooms while occupied by the elderly or infirm. Do not apply to classrooms when in use. Do not apply to institutions (including libraries, sports facilities, etc.) in the immediate area where occupants are present.

Environmental Hazards

This product is extremely toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposing of equipment washwater. 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

Do not contaminate water, food or feed by storage or disposal. Storage: Store product in original container in a locked storage area.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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

FOR USE IN NON-FOOD AREAS INDOORS AND OUTSIDE PREMISES OF HOTELS, MOTELS, HOMES, PRESCHOOLS, NURSERIES, DAY CAMPS, GREENHOUSES, LATHHOUSES, SEED HOUSES, FOOD HANDLING ESTABLISHMENTS, PACKAGING AND PROCESSING PLANTS, COMMERCIAL, INDUSTRIAL, OFFICE, INSTITUTIONAL AND STORAGE BUILDINGS, DAIRIES, MILK STORAGE ROOMS, EGG PROCESSING PLANTS, SUPERMARKETS, RESTAURANTS, BOTTLING PLANTS, CANNERIES, FLOUR AND FEED MILLS, BAKERIES, AND HOSPITALS. IN HOSPITALS, PATIENTS SHOULD BE REMOVED PRIOR TO TREATMENT. ALSO FOR USE IN CAMPER, MOBILE HOMES, BUSES, AUTOMOBILES, TRUCKS, AND BOXCARS. ALSO FOR USE IN DOG KENNELS AND HORSE STABLES. IN HORSE STABLES, NOT FOR APPLICATION IF HORSES WILL BE USED FOR FOOD.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially pre-

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pared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where food may be prepared or held.

Non-food/feed areas of food/feed areas are areas such as garbage rooms, lavatories, floor drains (to sewer entries and vestibules), offices, locker rooms, machine rooms, garages, mop closets and storage (after canning or bottling).

In the home, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment.

NOTE TO PEST CONTROL OPERATORS:

One gallon of finished spray is sufficient to treat 1580 linear feet (482 m) with a 6 inch (15.2 cm) spray band.

For contact and residual sprays, mix PRAMEX with water in the following manner:

FINISHED SPRAY	PRAMEX EC (fluid ounces)	WATER
0.25%	2 2/3 (79 ml)	1 gallon (3.79 L)
0.25%	2/3 (20 ml)	1 quart (0.95 L)
0.50%	5 1/2 (163 ml)	1 gallon (3.79 L)
0.50%	1 1/3 (39 ml)	1 quart (0.95 L)

For heavy infestations, use the 0.50% dilution. For lighter infestations and for maintenance purposes, use the 0.25% dilution.

PESTS INDOORS

For residual and contact control of *Cockroaches (Waterbugs), Crickets, Silverfish (Firebrats), Clover Mites, Millipedes, Centipedes, Earwigs, Sowbugs (Pillbugs), Spiders, Brown Dog Ticks, Lone Star Ticks, Ants, Fire Ants, Clothes Moths, Carpet Beetles, Fleas, Boxelderbugs, Scorpions, Spider Beetles, Bed Bugs, Grasshoppers, House Flies, Mosquitoes, Gnats, Fruit Flies, Cluster Flies, Flying Moths, Confused Flour Beetles, Saw-toothed Grain Beetles, Shiny Spider Beetles, Grain Mites, Red Flour Beetles, Angoumois Grain Moths, Grain Weevils, Indian Meal Moths, Mediterranean Flour Moths, Lesser Grain Borers, Cigarette Beetles, Drug Store Beetles, Chocolate Moths.* Spray thoroughly into hiding places such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas. Spray directly on insects where possible.

FOR BEDBUGS: Apply as a spot treatment to cracks and crevices, around baseboards, floorboards, bedboards and walls. First, thoroughly clean and air mattresses and springs. Then spot treat only areas that may harbor bedbugs, concentrating on tufts, folds and seams. Repeat as necessary. For persistent infestations, consult professional applicator.

GRAIN INSECTS: To control confused *Flour Beetles, Saw-toothed Grain Beetles, Spider Beetles, Shiny Spider Beetles, Grain Mites, Red Flour Beetles, Angoumois Grain Moths, Grain Weevils, Indian Meal Moths, Mediterranean Flour Moths, Lesser Grain Borers, Cigarette Beetles, Drug Store Beetles, Chocolate Moths, Carpet Beetles* - remove infested grain, cereal or flour and destroy. Avoid contamination of other food and foodstuffs in the areas by removing before spraying. Spray directly on exposed stages and into cracks and crevices where grain insects may be hiding. In homes, dispose of all infested products. The shelves and drawers should be cleaned and thoroughly sprayed so as to contact all pests, and covered with shelf paper after allowing shelves to dry. Any utensils that are contacted with spray should be washed before using. Repeat as necessary.

SPIDERS: Spray directly on these pests and use repeated applications to the webbing and all cracks and crevices which harbor spiders.

ANTS (INCLUDING FIRE ANTS): To kill ants, spray trails, nests and points of entry within buildings and homes. Spray directly on ants where possible. Repeat as necessary.

WASPS, HORNETS, YELLOW JACKETS, BEES: Application should be made in the late evening when insects are at rest. Spray liberally into hiding and breeding places, especially under attic rafters, contacting as many insects as possible. Repeat as necessary.

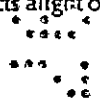
FLEAS, BROWN DOG, DEER, BEAR, BLACK LEGGED - Which Vector Lyme Disease - and Lone Star Ticks on dogs, cats, and Premises: Spray animals along back, under forelegs and on other areas, except scrotum, face and anus. Part hair to contact skin and insure good coverage. Hold sprayer about one foot (30 cm) away while spraying. Apply until hair is thoroughly moist. Do not spray directly in eyes, mouth or nose of animal. To prevent reinfestation, thoroughly spray the animals' bedding and other resting areas until the surface is slightly moist contacting as many insects as possible. Treat the floor areas, cracks and crevices in the floor and along baseboards at the rate of 2 seconds per linear foot (30 cm) at a distance of 12 to 18 inches (30-45 cm). Also spray the entire inside surface of dog houses. Do not use this product on old, sick or debilitated dogs.

HOUSE FLIES, MOSQUITOES, CLUSTER FLIES, GNATS, FRUIT FLIES, FLYING MOTHS: Close off all doors and windows. Point sprayer upward. Direct spray mist to all parts of the room, especially windows and other light sources which may attract these insects. Fill the room with mist, then leave the treated area. Keep the room closed for at least 15 minutes. Ventilate the room when treatment is completed.

CARPET BEETLES AND CLOTHES MOTHS: To treat carpets- hold container 14-18 inches (36-46 cm) from carpet. Apply spray evenly, covering the entire surface until slightly moist. Spray underside of carpet when possible. Avoid wetting or soaking. To Treat Garments, Blankets, Carpets and Other Fabrics Before Storage: Dry clean or wash before treatment and after storage. Apply spray evenly, covering the material on both sides until slightly moist. For best results, place treated materials in plastic bags after drying, and store in a dark place. Also spray floor and baseboards, closets, cracks, crevices, infested areas of shelving and/or wherever these insects are seen or suspected.

PESTS ON OUTSIDE SURFACES OF BUILDINGS: Use this product to control *Ants, Clover Mites, Crickets, Earwigs, Millipedes and Sowbugs (Pillbugs)* on the outside surfaces of buildings. To help prevent infestation of buildings, treat the building foundation to a height of 2 to 3 feet (0.5 to 1 m), where pests are active and may find entrance. Also, apply as a residual spray to outside surfaces of buildings, including porches, screens, window frames, eaves, patios, garages, refuse dumps, and other areas where these pests congregate or have been seen. Repeat treatment as needed to maintain effectiveness.

HOUSE FLIES, MOSQUITOES, CLUSTER FLIES, GNATS, FLYING MOTHS OUTDOORS: For outdoor use only as an aid in reducing annoyance from these insects. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages, and other places where these insects alight or congregate. Repeat as necessary.



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ANTS, LONE STAR TICKS, DEER, BEAR, BLACK LEGGED TICKS - Which Vector Lyme Disease - Crickets, Fleas, and Earwigs Outdoors: For treatment of localized infestations of these insects in outdoor areas where there are weeds or bushy non-crop areas, spray infested areas thoroughly. For ants, thoroughly wet hills and runways. Repeat application as infestations warrant and as reinfestations occur.

WASPS, HORNETS, YELLOW JACKETS, BEES: Application should be made in late evening when insects are at rest. Aim spray at nest openings in ground, bushes, and in cracks and crevices which may harbor nests, saturating nest openings and contacting as many insects as possible.

TO CONTROL FIRE ANTS: Dilute 2 tablespoons (30 ml) of this product in 1 gallon (3.79 L) of water. Apply 1 gallon (3.79 L) of solution as a gentle rain to each fire ant mound using a sprinkler can. Thoroughly wet the mound and surrounding area to a 4 foot diameter (1.22 m). For best results, apply in cool weather, 65- 80°F (18.5-27°C), or in early morning or late evening hours. Treat new mounds as they appear. Do not disturb the mound prior to treatment. If possible, treat all mounds in the vicinity, and treat all colonies which may not as yet have constructed a mound.

Larger quantities of solution can be prepared for multiple mound treatments. Equipment to deliver the diluted product as a gentle rain at the rate of 1 gallon (3.79 L) per mound is still required. Do not use equipment that produces a pressurized spray as pressurized sprays may disturb fire ants and cause migration, reducing product effectiveness.

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

AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

