

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

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**PRAMEX® INSECTICIDE
EMULSIFIABLE CONCENTRATE
13.3% FORMULA I
FOR REPACKAGING USE**

NOT FOR RESALE UNDER THIS LABEL

Contains 1 lb/gal (120 g/L) of Pramex Insecticide

ACTIVE INGREDIENT:

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

†Contains Petroleum Distillate.
*Cis/trans isomers ratio: min. 35% (±) cis and max. 65% (±) trans.
Pramex is a registered trademark of AgrEvo Environmental Health, Inc.

EPA Reg. No. 432-724

EPA Est. No.

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.)

**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, eggwhites, 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 Precautions

NET CONTENTS:

AgrEvo Environmental Health
95 Chestnut Ridge Road
Montvale, NJ 07645

**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 clothing before reuse.

Environmental Hazards

This product is extremely toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

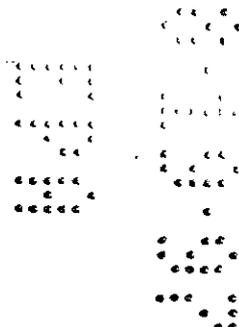
Instructions for Repackaging: This product may be used for repackaging as end-use products identical to Pramex Insecticide Emulsifiable Concentrate 13.3% Formula I for use on plants, EPA Reg. No. 432-553 and Pramex E.C. 13.3% Emulsifiable Concentrate, crawling insect spray, EPA Reg. no. 432-554. No changes may be made in formulation either by dilution or addition of other ingredients. It is the responsibility of the repackager to obtain EPA registration for his product. Additional data may be required to support registration of any repackaged product if the labeling, text or graphics are altered and if the hazard or efficacy are affected by such alterations.

ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 15 1998

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

432-724



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STORAGE & DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store product in original container in a locked storage area. 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.**

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 the 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.

WARRANTY STATEMENT

Our recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with the directions or established safe practice. The buyer must assume all responsibility, including injury or damage, resulting from its misuse as such, or in combination with other materials.

