



432-1166

09/08/2003

1/6

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 8 2003

Mr. Adrian Krygsman
Aventis Environmental Science
95 Chestnut Ridge Road
Montvale, NJ 07645

Subject: Label Amendment Updating First Aid per PR Notice 2001-1 and Revising
Marketing Claims at Request of Dept. of Defense
PERMANONE® Arthropod Repellent
EPA Reg. No. 432-1166
Your Submission, Dated August 13, 2003, as Amended by Email
September 5, 2003

Dear Mr. Krygsman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. The Environmental Hazards statements are not appropriate for an aerosol product intended for treating field clothing and mosquito netting. If you wish to include an Environmental Hazards section, you must revise it to read as follows: "This product is highly toxic to fish. Do not apply directly to water." All other statement should be deleted from this section.
2. The disposal instructions ("Pesticide Disposal" and "Container Disposal" sections) are not appropriate for an aerosol product intended for treating field clothing and mosquito netting. Delete these sections and replace them with the following language from PR Notice 2001-6 for aerosol containers:

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 [insert a toll free number which meets the criteria in paragraph II.E. of PR Notice 2001-6] for disposal instructions.

[You may also add disposal instructions for field situations, where the above instructions would not be practical. The statement "In field situations, bury the container" from the previously approved label would be acceptable.]

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosure

PERMANONE® Arthropod Repellent

- * **DO NOT APPLY TO SKIN**
- * **Kills/Repels Mosquitoes and Ticks**
- * **For Use and Distribution within the Department of Defense Only**
- * **Field Personnel Clothing and Mosquito Netting Only**

ACTIVE INGREDIENT:

**Permethrin.....0.5%

INERT INGREDIENTS:.....99.5%
100.0%

*Hot Weather (100% Cotton) and Temperate (Nylon/Cotton; 50:50) Field Uniforms Only.

***(3-phenoxyphenyl)methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/Trans ratio: Min. 35% (+/-) cis and max. 65% (+/-) trans.*

EPA Reg. No. 432-1166

EPA Estab. No.: 432-

Keep Out of Reach of Children
CAUTION
 See side panel for additional
 precautions

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

SEP 8 2003

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
432-1166**

NET CONTENTS: _____

**Bayer Environmental Science
A Business Group of Bayer CropScience LP
95 Chestnut Ridge Road
Montvale, N.J. 07645**

FIRST AID	
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none"> • 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 swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-334-7577 for emergency treatment information.</p>	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Avoid contact with face, eyes, or skin. Avoid breathing vapors or spray mist. Wash thoroughly after handling and before eating or smoking. Do not allow contact with treated surfaces until spray has dried. Do not allow spray to contact food, or water supplies. Thoroughly wash dishes and food handling utensils contaminated with this product.

ENVIRONMENTAL HAZARDS

This product is highly toxic to fish. Avoid direct application to lakes, streams, ponds, tidal marshes and estuaries. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in adjacent areas. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

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

To be used for treatment of hot weather and temperate field clothing and mosquito netting only. **DO NOT TREAT UNIFORM CAP.**

For protection against *Mosquitoes* and *Ticks* select an outdoor area protected from the wind, spray outer surfaces of clothing (while not being worn) and mosquito netting with a slow sweeping motion to lightly moisten the surface of the fabric. Treat the clothing for a minimum of 30 seconds on each side and allow 2 hours (4 hours under humid conditions) to dry prior to being worn. Hold can at a distance of 6 to 8 inches from the object being treated. Treatment should moisten the surface of the fabric enough to cause a slight color change. Use approximately 3/4 of this container to treat one complete field uniform. Use remainder on mosquito netting.

Treat the entire outside surface of clothing with special attention to socks, trouser cuffs, and shirt cuffs. Pant cuffs should be worn inside the socks or footwear to ensure full protection against *Ticks* and *Chiggers*. This item must be used in conjunction with the standard issue repellent approved for application to exposed skin areas to achieve maximum protection from *Mosquitoes*. Follow standard field uniform laundering procedures weekly. Reapply after six weeks and sixth laundering.

STORAGE AND DISPOSAL

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

Store in original container in a cool dry place inaccessible to children and pets and away from heat or open flame.

Pesticide Storage and Spill Procedures: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

Pesticide Disposal: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal: Do not reuse empty container. This can may be offered for recycling. Before offering for recycling, empty can by using the product according to the label. (DO NOT PUNCTURE). If recycling is not available, securely wrap in several layers of newspaper and discard in trash.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer Environmental Science. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: BAYER ENVIRONMENTAL SCIENCE MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer Environmental Science is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. Bayer Environmental Science disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER ENVIRONMENTAL SCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

Permanone is a registered trademark of Bayer AG.