

425/5474132
18 R

Mr. James A. Armbruster, Ph.D.
PBI/Gordon Corporation
1217 West 12th. Street
Kansas City, Missouri 64101

SEP 14 1998

Subject: Use Deletion for mosquito control for referenced label.
Reg. No. 2217-781
Product Name: Gordon's Chemicals Permanone® General Purpose Aqueous
Insecticide
Date of Submission: June 20, 1994

Dear Dr. Armbruster,

The Agency has completed reviewing PBI/Gordon Corporation's June 20, 1994 submission of a use deletion of Gordon's Chemicals Permanone® General Purpose Aqueous Insecticide (Reg. No. 2217-781) for mosquito control. The request for the use deletion was published in the Federal Register Volume 59, No. 235 (dated Thursday December 8, 1994.) Since your original submittal PR notice 96-6 has been published by the Agency addressing Pet Pesticide Product Label Statements. A copy of the PR notice can be obtained via the internet at the following locations http://www.epa.gov/opppmsd1/PR_Notices/pr96-6.html. The following label language must be added to your original submittal of June 20, 1994 to adequately update your label to the current pet care label requirements outlined in PR notice 96-6.

1. Direct user to read entire label by inserting the following statement at the top of the rear or side panel in bold, all caps. **"READ ENTIRE LABEL BEFORE EACH USE."**

2. The statement "Read Entire Label Before Each Use" should be followed immediately by the following statement in bold and caps: **"USE ONLY ON (DOGS, CATS, or DOGS OR CATS)."**

3. The re-application statement "Repeat as necessary" needs to be product specific; and the statement should be one of the following:

- (a) "Do not Reapply Product For _____.
(Insert number of day(s), week(s) or month(s).)"
- (b) "Reapply every _____." (Insert number of day(s), week(s), or month(s).)
- (c) "Do Not Repeat Treatment For _____."
(Insert number of day(s), week(s), or month(s).)
- (d) "Repeat every _____." (Insert number of day(s), week(s) or month(s).)

4. Every product label should have:

"Do Not Use On _____ Under _____ Weeks."

The minimum age may not be less than 12 weeks unless accepted domestic animal safety data are on file at the Agency to support use on younger animals. Note: There are only a few products

with data that would support a younger age than 12 weeks. Your current proposed label submitted June 20, 1994 has the statement "less than four weeks old." If you intend to maintain this minimum age statement, you must provide acceptable animal safety studies to support this claim.

5. PBI/Gordon Corporation should incorporate the statement below or submit, cite data/information indicating this statement (or portion of it) is not needed.

"Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals."

6. You should have the following precautionary statements added to the label:

"Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately."

It has come to our attention that your product, Gordon's Chemicals Permanone® for the home, EPA Registration Number 2217-781, may require use of a separate container for spraying. In recent years the Agency has been discouraging the registration of indoor use of pesticides by consumers unless it is ready to be applied as marketed (as in a pump spray or aerosol.) Accordingly, we are requiring that you make one of the following changes in the labeling and marketing of this product:

1. The product may be marketed as proposed if the labeling includes the limitation:

"For Pest Control Operators and Commercial Use Only."

This text must appear on the front panel of the label.

2. If the product is sold with a spray head attachment or a generic type spray head can to be purchased and affixed to the container for application then the labeling must indicate this i.e. "Attach spray head trigger before applying. Do not transfer to unlabeled containers."

3. The product may be marketed without either of the above restrictions if you delete all directions from the labeling for use indoors.

A stamped copy of the label is enclosed for your records. If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,

George LaRocca
Product Manager 03
Insecticide Branch
Registration Division (7505C)

enclosure

GORDON'S CHEMICALS PERMANONE®

GENERAL PURPOSE AQUEOUS INSECTICIDE II

- * For domestic use both indoors and outdoors
- * A ready-to-use PERMANONE® stable emulsion insecticide
- * For control of fleas, brown dog ticks, and lice on premises and on dogs
- * Controls fleas and ticks on dogs for 35 days
- * Aids in control of ticks on dogs for an additional 2 weeks
- * For use on livestock and on premises to control pests listed on back panel

ACTIVE INGREDIENT:

*Permethrin..... 0.50%

INERT INGREDIENTS:..... 99.50%

TOTAL 100.00%

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

PERMANONE® is a registered trademark of Fairfield American Corporation.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician immediately. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove affected person to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.
See back panel for additional Precautionary Statements.

NET CONTENTS (1 Quart, Half Gallon, 1 Gallon)

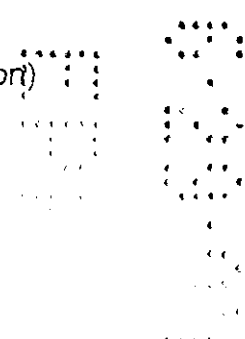
XXX/752 AP
EPA REG. NO. 2217-781
EPA EST. NO. 2217-KS-1
Mfd. by: PBI/GORDON CORPORATION
1217 W. 12th STREET
KANSAS CITY, MO 64101

ACCEPTED
with COMMENTS
by EPA Letter Dated

SEP 14 1998

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

2217-781



STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

4/6

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. May be absorbed through skin. Avoid inhalation of spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly after handling and before smoking or eating.

Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before surface applications. Vacate room after indoor treatment and ventilate before reoccupying. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry.

Environmental Hazards: This product is 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 when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool, dry area.

PESTICIDE DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse container (bottle, can, jar). Rinse thoroughly before discarding in trash.

Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container.

SHAKE WELL BEFORE USING

- INDOOR APPLICATION -

Do not use in commercial food/feed processing, preparation, serving or storage areas. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Cover exposed food.

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

For spot application only. Do not use as a space spray indoors. Do not apply to rooms occupied by the elderly or infirm. Do not apply to classrooms when in use.

SURFACE SPRAYING: To control **Cockroaches, Waterbugs, Palmetto Bugs, Scorpions, Millipedes, Centipedes, Sowbugs, Pillbugs, Ants, Silverfish, Firebrats, Spider, Crickets, Clover Mites, Cheese Mites, Granary Weevils, Rice Weevils, Confused Flour Beetles, Rust Red Flour Beetles, Drugstore Beetles, Meal Worms, Grain Mites and Cadelles**, 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 rugs. Make localized application to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving. Repeat treatment as needed.

To control **Bedbugs**, spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Allow mattresses and other treated articles to dry thoroughly before use. Treat baseboards, moldings and floors. Repeat treatment as needed.

To control Fleas (adults and larvae) and Ticks (adults and larvae), thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboard, 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 needed. 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 storages directing the spray into cracks, joints and crevices. After airing, infested articles may be treated lightly, keeping nozzle at least three feet from fabric to avoid staining.

To control Lice and Louse Eggs, spray 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.

ON LIVESTOCK: To protect cattle (beef and dairy), goats, sheep, hogs, and horses from Horn Flies, Face Flies, House Flies, Mosquitoes and Gnats apply a light mist sufficient to wet the surface of the hair. For face flies, spray face and head, but do not spray into eyes.

To control Stable Flies, Horse Flies and Deer Flies, apply at a rate of 2 fluid ounces per adult animal, sufficient to wet the hair. Repeat treatment daily or at intervals necessary to give continued protection.

To control Blood-sucking Lice, apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

To control Poultry Lice, spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

To control Bedbugs and Mites in poultry houses spray crevices of roost poles, cracks in walls, and cracks in nests where the bedbugs and mites hide.

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 underbody. While spraying fluff the hair so that the spray will penetrate to the skin. Make sure spray wets thoroughly, but do not saturate animal. Do not spray into eyes or face. Avoid contact with genitalia. Use protective gloves or mitts when applying product. Repeat as necessary.

NOTE: Not recommended for use on puppies less than four weeks old. DO NOT USE ON CATS OR KITTENS. Do not use on old, sick, or debilitated animals.

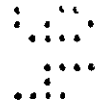
- OUTDOOR APPLICATION -

PERIMETER TREATMENT to control TICKS (including ticks which may carry Lyme Disease):

Use PERMANONE GENERAL PURPOSE AQUEOUS INSECTICIDE II as a residual treatment to control Ticks including the Deer Tick (*Ixodes dammini*), Lone Star Tick (*Amblyomma americanum*), Brown Dog Tick (*Rhipicephalus sanguineus*), American Dog Tick (*Dermacentor variabilis*), and Western Black-legged Tick (*Ixodes pacificus*).

For each area listed below, apply until surface is wet (approximately 1 gallon per 750 to 1,000 square feet).

Treat around windows and doors, porches, screens, eaves, patios, garages, under stairways and in crawl spaces where these pests may enter.



Treat a band of vegetation and leaf litter 6 to 10 feet wide around and outside of buildings to help control ticks occurring there.

6/6

To help control Ticks in outdoor activity areas, treat a band of vegetation and leaf litter 6 to 10 feet wide and adjacent to activity areas, especially where dense vegetation occurs.

FOR CONTROL OF GARDEN INSECTS: For use on roses, dahlias asters and other ornamentals to control Japanese Beetles, 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, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against Whiteflies, Aphids, Spider and Red Mites, Exposed Thrips, Lace Bugs, Japanese Beetles, Pavement Ants, Clover Mites and Armyworms. When spraying plants, do not operate closer than 18 inches. Use sweeping motion. 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 infestations occur.

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tomadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

