

2217-826

6/10/2003

4/7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION PESTICIDES
AND TOXIC SUBSTANCES

June 10, 2003

Craig Martens
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, Missouri 64101

Subject: Label Amendment - Updating First Aid Statement in Accordance with PR Notice 2001-1.
Gordon's Home Pest Killer
EPA Reg. No. 2217-826
Your Submission Dated November 26, 2002

Dear Mr. Martens:

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 listed 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. Revise front of the label-- replace " Inert Ingredients" with the phrase "Other Ingredients".
2. Based on the acute toxicity profile for this type product you are only required to have the "If on skin or clothing" first aid statement. You may delete the other statements. If you retain the "If swallowed" first aid replace "Do not give any liquid to the person" with "Have person sip a glass of water if able to swallow".
3. Under Precautionary Statements add these statements after the word Caution: "Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing".
4. The dog precautions under Precautionary Statements should be moved under the Directions for Use on dogs.

Please note the new disposal instructions for household use pesticide products in PR Notice 2001-6. These label changes must be made by October 1, 2003. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



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

GORDON'S PEST KILLER

- ◆ 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 14 Days.
- ◆ For Control of Pests on Livestock.
- ◆ With Country Fresh Fragrance.
- ◆ Provides 60-Day (Two Months) Control of Cockroaches.
- ◆ Provides 60-Day (Two Months) Control of Fleas.
- ◆ Provides 60-Day (Two Months) Control of Stored Product Pests.

ACTIVE INGREDIENT:

Permethrin.....	0.25%
INERT INGREDIENTS:.....	<u>99.75%</u>
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® - Registered Trademark of AgrEvo Environmental Health, Inc.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional Precautionary Statements and First Aid.

NET CONTENTS: 1 Pint, 1 Quart, or 1 Gallon

AP-----
 EPA REG NO 2217-826
 EPA EST NO XXXX-XX-X
 MANUFACTURED BY:



ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 JUN 10 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2217-826

4/7



READ THE ENTIRE LABEL BEFORE EACH USE. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PET USE APPLIES TO USE ONLY ON DOGS

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: 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. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry.

Do not use on dogs under twelve (12) weeks old. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals. 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.

SPECIAL ANIMALS:

Consult a veterinarian or call this Animal Poison Control Hotline, 1-800-345-4735 before using this product on debilitated, aged, pregnant, nursing, or medicated animals.

ADVERSE REACTION INFORMATION:

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, or call this Animal Poison Control Hotline, 1-800-345-4735.

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 treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for 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"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information in case of emergency, call toll free 1-877-800-5556.</p>	

ENVIRONMENTAL HAZARDS:

This product is extremely toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

(Containers one gallon or less)

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

PESTICIDE STORAGE: Store upright at room temperature. Avoid exposure to extreme temperatures.

PESTICIDE DISPOSAL: Pesticide or rinse water that cannot be used according to label instructions must be disposed of on site or at or by an approved waste disposal facility.

CONTAINER DISPOSAL: Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

(Containers larger than one gallon)

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

PESTICIDE STORAGE: Store upright at room temperature. Avoid exposure to extreme temperatures.

PESTICIDE DISPOSAL: Pesticide or rinse water that cannot be used according to label instructions must be disposed of on site or at or by an approved waste disposal facility.

CONTAINER DISPOSAL: *For Metal Containers* - 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 Plastic Containers* - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by burning. If burned stay out of smoke.

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

SHAKE WELL BEFORE USING

INDOOR APPLICATION

Not for use in Commercial Food/Feed Handling Establishments, Restaurants or Other Commercial Facilities. Not for use in Institutions. In the home all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food/feed should be covered or removed.

For spot application only. Do not use as a space spray indoors.

SURFACE SPRAYING:

For 60-Day (Two Months) Control Of Cockroaches, Waterbugs, Palmetto Bugs, Scorpions, Millipedes, Centipedes, Sowbugs, Pillbugs, Ants, Silverfish, Firebrats, Spiders, 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.

To Control Bedbugs: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors.

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 baseboards, moldings, window and door frames, and entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. 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.

6/7

To Kill 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 2 fluid ounces per adult animal, sufficient to wet the hair thoroughly. Repeat treatment daily.

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. Repeat application every two weeks if necessary. DO NOT USE ON CATS OR KITTENS.

OUTDOOR APPLICATION

To Help Control Ticks in Outdoor Activity Areas: Treat a band of vegetation and leaf litter 6 - 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 kill *Japanese Beetles* hit by spray as well as *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.

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, tornadoes, 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.