3487-27

9/14/2004



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

> OFFICE OF PREVENTION, PUSPICIDES AND TOXIC SUBSTANCES

September 14, 2004

James Edwards Bacon Products Corp. P.O. Box 22187 Chattanooga, TN 37422

Subject: Label Amendment - Response to Agency's May 5, 2004 letter Eagles-7 Flea & Tick Spray EPA Reg. No. 3487-27 Your Letter Dated June 28, 2004.

Dear Mr. Edwards:

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. Under Indoor Application add "Do not use in commercial food/feed handling establishments, restaurants or other areas where food is commercially prepared, processed or served".

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely, anda alexander for

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

Front Panel

Eagles-7 Flea & Tick Spray

EPA Reg. No. 3487-27 EPA Est. No. 3487-TN-1

- For Homeowner 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
- For Control of Ticks which may cause Lyme disease on Premises
- Controls Fleas and Ticks on Dogs for 35 Days
- Aids in Control of Ticks on Dogs for an additional 2 weeks
- For control of flies and lice on livestock and premises

ACTIVE INGREDIENT:*Permethrin 0.50%

*(3-phenoxyphenyl)methyl(+/-)cis/trans3-(2,2-dichloroethenyl)2,2dimethylcyclopropanecarboxylate.Cis/trans ratio:min.35%(+/-)cis and max. 65% (+/-)trans.

*PERMANONE - Registered Trademark of Valent BioScience

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KEEP OUT OF REACH OF CHILDREN CAUTION

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

Wash thoroughly after handling and before smoking or eating.

Jack panels for additional precautionary statements

ACCEPTED with COMMENTS In EPA Letter Dated

SEP 1 4 2004 Under the Federal Insecticide. Fungicide. and Rodenticide Act. as amended. for the posticide registered under EPA Reg. No. 3487-37

Back Panel

DIRECTIONS FOR USE

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

Ready to Use. Turn nozzle on trigger sprayer to desired pattern. Do not transfer to another container. Avoid contamination of food 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.

READ ENTIRE LABEL BEFORE EACH USE-PET USE APPLIES TO USE ONLY ON DOGS SHAKE WELL BEFORE USING

INDOOR APPLICATION

For spot application only. Do not use as a space spray indoors. Do not apply to classrooms while in use. 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. SURFACE SPRAYING

To control 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, including Ticks which may carry Lyme disease (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.

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 at a rate of 2 ounces per adult animal, sufficient to wet the hair thoroughly. 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.

For Use On Dogs:

To control Fleas, Ticks and Lice: Start spraying at the tan moving the dispenser rapidly and making sure that

t nimal'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. 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 on 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.

DO NOT USE ON CATS OR KITTENS.

t use on old, sick or debilitated animals.

TO CONTROL TICKS, INCLUDING TICKS WHICH MAY CARRY LYME DISEASE (PERIMETER TREAT-MENT):

Use Eagles- 7 Flea & Tick Spray as a residual treatment to control Ticks including the Deer Tick (Ixodes Dammini), Lone Star Tick (Amblyomma Americanum), Brown Dog Tick (RhipicephalusSanguineus), American Dog Trick (Dermacentor Variabilis) and Western Black-legged Tick (Ixodes Pacificus). For each use areas listed below, apply until surface is wet (approximately 1 gal/75-1000ft).

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

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

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

FOR CONTROL OF GARDEN INSECTS:

Not for use on plants being grown for sale or other commercial use or for commercial seed production or for research purposes.

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, camations, chrysanthemums, dahlias, delphiniums, dogwoods, English ivy, eunonymus, fuschia, geraniums, crassula, grape vines, Kentiapalms, laurels, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against Whiteflies, Aphids, Spiders 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.

STORAGE AND DISPOSAL

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or call 1.800.CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain. Do not transfer to another container.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothing: 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 inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambutance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for future treatment advise. If in eyes: 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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and other aquatic organisms. Do not apply directly to

water, to areas where surface water is present or to intertidal areas below the high water mark. Do not contaminate water when disposing of equipment washwaters.

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herewith.

Bacon Products Corporation P. O. Box 22187 Chattanooga, TN 37422-2187