

JUN 11 1991

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Mr. Alan Ebersold
 Boehringer Ingelheim Animal Health, Inc.
 Anchor Division
 2621 North Belt Highway
 St. Joseph, MO 64502

Dear Mr. Ebersold:

Subject: Amendment - Addition of Deer Tick Claim
 Permethrin II
 EPA Registration No. 4691-108 ✓
 Permethrin Pet, Yard and Kennel Spray
 EPA Registration No. 4691-109
 Your Applications Dated November 19, 1990

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. For both of the subject product, make the following labeling changes:
 - a. Add the following precaution under the Direction For Use:

Do not use on sick, old or debilitated animals.
 - b. Delete the statements of practical treatment under the Precautionary Statement section and identify them under the heading and format:

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED - Call a physician or Poison Control Center immediately. DO INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

IF ON SKIN - Remove contaminated clothing and was affected areas with soap and water.

~~IF IN EYES - Flush eyes with plenty of water call a physician immediately.~~

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IF INHALED - Remove victim to fresh air. Apply artificial respiration if indicated.

- c. Add footnote to the ingredient statement indicating: ***Contains petroleum distillates.**
2. For EPA Reg. No. 4691-108, make the following changes:
 - a. Delete "long-lasting" from the labeling since you have not supplied/cited data justifying this claim as requested in our August 3, 1988 letter.
 - b. Delete "... and small animals" or identify. We assume you are referring to dogs. If so then state **Pests on Swine, sheep, poultry and dogs.** If dogs are retained on the label then comment 3a below (puppies only) also applies.
 - c. Since the product is for agricultural use add the following statement to the front panel:

"For Agricultural Use Only"
 3. For EPA Reg. No. 4691-109, make the following changes:
 - a. Add the following precautions under Directions For Use:

Do not use this product on puppies or kittens less than 3 months old.
 - b. Revise the format of the Storage and Disposal section as it appears in EPA Reg. No. 4691-108.
 - c. Refer to comment 2b above. the same comment applies here.
 - d. The product is approved for use on dogs and cats. Thus either delete "pet" and replace with "dog and cat" or qualify the term pet with dog and cat throughout the label.
 - e. Under directions you state to treat not more than once every two weeks, however under the application column you say to treat 7 to 14 days later. Please clarify.

Submit five copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

We have no record of a response to our August 3, 1988 letter regarding potential toxicity to cats from a dip application. A copy of this letter is enclosed. Please respond.

Sincerely,

George T. LaRocca
Product Manager 13
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

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BEST AVAILABLE COPY

JUN 11 1991

ANCHOR™ PERMECTRIN™ II

10% EMULSIFIABLE INSECTICIDE
LONG LASTING LIVESTOCK AND PREMISE SPRAY

Controls and Kills Deer Ticks
(Carrier of Lyme Disease)

ACTIVE INGREDIENTS

Permethrin (3-phenoxyphenyl) methyl (±)-cis, trans-3-(2,2-dichloroethenyl)-2,	10.00%
2-dimethylcyclopropanecarboxylate*	90.00%
INERT INGREDIENTS	90.00%
TOTAL	100.00%

*Cis/Trans-ratio: Min. 35% (±) cis, and max. 65% (±) trans isomers.

Contains 0.75 lbs permethrin per gallon.

CAUTION: Keep out of the reach of children.

See back panel for additional cautions.

NET CONTENTS: 8 OUNCES

(0.237 liter)

Code 401-421

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS

CAUTION: May be harmful if swallowed, inhaled or absorbed. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. In case of eye contact, immediately flush eyes with plenty of water. In case of skin contact, wash skin with soap and water. Get medical attention if symptoms persist. If swallowed, call a physician. Warning should be placed on product because of possible pulmonary damage due to solvent.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish. Use with care in areas adjacent to any body of water. Do not apply directly to water. Contaminate water by cleaning of equipment or disposal. Use product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **KEEP CONTAINER SEALED WHEN NOT IN USE. PROTECT FROM FIRE.** In case of spill on floor or paved surfaces, soak up with absorbent material. Remove to chemical waste area in accordance with state and local regulations. **PHYSICAL DISPOSAL:** Vessels resulting from the use of this pesticide or on one or of an approved waste disposal facility. **CONTAINER DISPOSAL:** Do not reuse container. Triple rinse, then offer for recycling or reconditioning, or purchase a secondary container, or incineration, or, if allowed by state, by burning. If burned, stay out of smoke.

EPA Reg No. 4491-108 EPA Est No. 6
Mfg. by Anchor Division, Beechler Corporation
St. Joseph, Missouri 64502 U.S.A.

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Read Directions
Before Using

PESTS	PERMECTRIN II DILUTIONS FOR USE	HOW TO APPLY
PESTS ON FARM PREMISES (Barns, Dairies, Feedlots, Stables, Poultry and Livestock Housing)		
Houseflies, Stableflies, Lesser Houseflies and other manure breeding flies, Flies, Lice, mites and ticks, including Deer Ticks (carrier of Lyme Disease). Also in control of cockroaches, mosquitoes and spiders.	Mix 1 qt in 25 gal; 8 oz in 6.25 gal of water**	Spray all surfaces to runoff with diluted emulsion using 1 gal per 750 sq ft
	Use undiluted in mist blower as a space spray. Use 1 qt in 25 gal of oil*	Mist or fog 4 oz per 1000 sq ft.
PESTS ON LARGE ANIMALS (Dairy or Beef Cattle and Horses)		
Faceflies, Hornflies, Horseflies	Mix 1 qt in 20 gal oil* to charge backrubbers	Animals self apply. Recharge backrubber or other as needed
Houseflies, Mosquitoes, Horseflies, Stableflies, Fleas, and Ticks, including Deer Ticks, carrier of Lyme Disease).	Mix 1 qt in 200 gal, 8 oz in 50 gal, 1/2 oz in 3 gal of water.	Spray to thoroughly cover entire animal. For lice or mites, a second treatment is recommended 14-21 days later.
Ear Ticks, Faceflies, Hornflies	Mix 2 oz in 1 gal oil* or water for spot application	Apply 1/2 oz per ear; 2-4 oz on face, or 12-16 oz along the backline
PESTS ON SWINE, SHEEP, POULTRY AND SMALL ANIMALS (Do not ship swine for slaughter within 5 days of last treatment)		
Manure Mites	Mix 1 qt in 100 gal, 8 oz in 25 gal, 1 oz in 3 gal of water	Spray or dip animals. Retreat after 14 days spraying walls and floor and replace bedding to kill late hatching developing stages
Houseflies, Mosquitoes, Dog Lice, Fleas, Ticks, including Deer Ticks (carrier of Lyme Disease)	Mix 1 qt in 100 gal, 8 oz in 25 gal, 1 oz in 3 gal of water	Spray, paint, or dip to apply 1 pint per dog, pig, or sheep, especially around ears
Poultry mites	Mix 1 qt in 50 gal, 8 oz in 12.5 gal, 2 oz in 3 gal of water	Spray 1/2 oz per bird, or 1 gal per 100 birds, directed toward vent area. Spray cages

* Livestock mineral oil or other non-irritating organic oil. **1 oz is equivalent to 2 tablespoons.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

For use on horses, beef and dairy cattle, swine, poultry and pets and their premises for control of flies, lice, mites and ticks, including Deer Ticks (carrier of Lyme Disease). Mix Permethrin II and apply the w.e.-diluted material to animals and pest breeding or resting surfaces at the rates shown on the accompanying chart. These dilutions and rates will provide most efficient pest control under conditions of heavy pressure when good contact is achieved. Timing and frequency of application should be based on pest populations reaching nuisance levels, but accompanying manure removal and sanitation practices should precede sprays. Do not spray feed, food or water. Retreat as needed but not more often than once every two weeks. Wash udders thoroughly before milking.

Anchor Division
Boehringer Ingelheim Animal Health, Inc.

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<p>PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS</p> <p>CUTION: May be harmful if swallowed. Inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin eyes or clothing. In case of eye contact, immediately flush eyes with plenty of water. In case of skin contact, wash skin with soap and water. Get medical attention if irritation persists. If swallowed, call a physician. Vomiting should be supervised by a physician because of possible pulmonary damage due to aspiration of the solvent.</p>
<p>ENVIRONMENTAL HAZARDS</p> <p>This pesticide is extremely toxic to fish. Use with care when applying to areas adjacent to any body of water. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.</p>
<p>PHYSICAL OR CHEMICAL HAZARDS</p> <p>Do not use in store near heat or open flame.</p>
<p>STORAGE AND DISPOSAL</p> <p>Do not contaminate water, food or feed by storage or disposal. KEEP CONTAINER SEALED WHEN NOT IN USE. PROTECT FROM FREEZING. In case of spill on floor or paved surfaces, soak up with sawdust or synthetic absorbent. Remove to chemical waste area and dispose of in accordance with state and local regulations.</p> <p>PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on soil or at an approved waste disposal facility.</p> <p>CONTAINER DISPOSAL: Do not reuse container. Triple rinse (or equivalent). Then offer for recycling or reconditioning or purchase and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.</p>

EPA Reg No 4691-108 EPA Est No 6175 LA-1

Mfg. by Anchor Division, Boehringer Ingelheim Animal Health, Inc.
St. Joseph, Missouri 64502 U.S.A.

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