

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 wash affected areas with soap and water.

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

LEA 6/4/91

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 1992

# Pennectrin<sup>™</sup> Pet, Yard and Kennel Spray

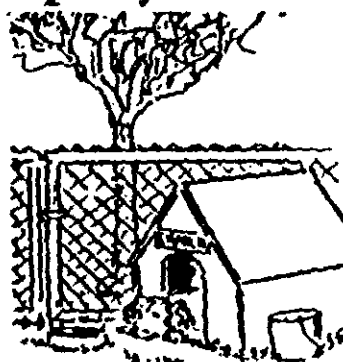
Long Lasting Pet and Premise Spray

Controls and Kills Deer Ticks  
 (Carrier of Lyme Disease)

10% Emulsifiable Insecticide  
 KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional  
 precautionary statements.



Active Ingredient  
 Permethrin (3-phenoxyphenyl) methyl  
 (1)-cis, trans-3-(2,2-dichloroethyl)-1,2-  
 dimethylpropylpropanecarboxylate\*... 10.00%  
 Inert Ingredients... 90.00%  
 100.00%

\*Cis/trans ratio: Min. 35% (+) cis, and max.  
 65% (-) trans isomers.  
 Contains 0.75 lb permethrin per gallon.

NET CONTENTS 8 FL OZ (237 ml)

**ANCHOR**

Circle 401-431

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS

**CAUTION:** May be harmful if swallowed, inhaled or absorbed through skin. Avoid breathing its mist. Avoid contact with skin, eyes, or clothing. If eye contact, immediately flush eyes with plenty of water. In case of contact, wash skin with soap and water. Get medical attention if persists. If swallowed, call a physician. Vomiting should be supervised by a physician because of possible pulmonary damage due to propylene solvent. Do not allow children to handle or apply this product.

## ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish. Use with care when on areas adjacent to any body of water. Do not apply directly to water. Contaminate water by cleaning of equipment or disposal of waste. 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. PESTICIDES FROM IF case of spill on floor or paved surface, soak up with sand, earth, absorbent. Remove to chemical waste area and dispose of in with state and local regulations. Do not reuse container. Recycle container. Then offer for recycling or reconditioning or purchase of in a sanitary landfill, or incineration, or, if allowed by state authorities, by burning. If burned, stay out of smoke. Wastes resulting from the use of this product may be disposed of in an approved water disposal facility.

EPA Reg. No. 4691-109 EPA Est. No. 6175

Mfg. by Anchor Division, Dow Chemical (Inghelheim Animal)  
 St. Joseph, Missouri 64502 U.S.A.

## BEST AVAILABLE COPY

Read Directions  
Before Using

| Product Use  | Dilution for Use  | Application  |
|--|---|--|
| Fleas, lice, mange mites, ticks, including Deer Ticks (carrier of Lyme disease). Pests on small animals (dogs and cats). | Mix 8 oz in 25 gal or 1 oz in 3 gal of clean water for area or spot applications. | Sponge on cats. Dip, spray, or sponge on dogs. Apply solution until skin is wet. Allow to dry. As a guide, use 1 pint per medium-sized dog. For lice or mites, a second treatment is recommended 7 to 14 days later. |
| Spraying kennels, dog houses, runs and yards.  | Mix 8 oz in 6.3 gal or 1 1/2 oz in 1 gal of clean water.                          | Spray all surfaces to point of run-off with diluted spray. As a guide, use 1 gallon per 750 sq. ft.  |

### DIRECTIONS FOR USE

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

For use on pets and their premises for control of (fleas, lice, mites and ticks, including Deer Ticks (carrier of Lyme Disease)). Mix PERMECTRIN II Pet, Yard & Kennel Spray and apply the diluted material to animals and pest breeding or resting surfaces at the rates shown in the accompanying chart. These dilutions and rates will provide most efficient pest control under conditions of heavy pressure when good contact is achieved. Accompanying manure removal and sanitation practices should precede sprays. Do not spray feed, food or water. Retreat as needed but not more than once every two weeks.

Anchor Division  
Boehringer Ingelheim Animal Health, Inc.

#### PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS

**CAUTION:** 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. Do not allow children to handle or apply this product.

#### ENVIRONMENTAL HAZARDS

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.

#### 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 FREEZING.** In case of spill on floor or paved surface, soak up with sand, earth or synthetic absorbent. Remove to chemical waste area and dispose of in accordance with state and local regulations. Do not reuse container. Triple rinse (or equivalent). Then offer for recycling or reconditioning or prepare 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. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

EPA Reg. No. 4691-109 EPA Est. No. 6175 LA-1  
Mfg. by Anchor Division, Boehringer Ingelheim Animal Health, Inc.  
St. Joseph, Missouri 64502 U.S.A. 814 948