

Reg # 4816-696

PM-15

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 7 1990

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Ms. Helen C. Theodore
Fairfield American Corporation
309 Harrison Street
Frenchtown, NJ 08825

Dear Ms. Theodore:

Subject: Amendment - Addition of Deer Tick and Western
Black-Legged Tick Use
Permanone General Purpose Aqueous Insecticide
EPA Registration No. 4816-696
Your Application Dated November 3, 1989

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is not acceptable for the reasons given below.

1. The reference data in the file 4618-AUA used to support the proposed label claims for Deer Ticks and Black-Legged Tick were found to be inappropriate. The efficacy study supports a clothing treatment claim for American Dog Tick Dermacentor variabilis, and the Lone Star tick, Amblyomma americanum. Therefore, the appropriate data must be submitted in support of this amendment. The data should be conducted to support the following applications and treatments.
 - a. Surface spray. Data should include topical application to ticks.
 - b. For perimeter treatment, the data should include outdoor application to various substrates, including wood, brick, concrete, aluminum & vinyl siding.
 - c. For band treatment, a study must be conducted which indicates that the application will indeed prevent entry by these pests.

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- d. For crawl space treatment, the study should be conducted on both concrete and soil.
2. We suggest you submit a protocol for this study for our review prior to initiation of the test.

You may wish to submit the article referenced in your letter (Lane, R.S. Treatment of Clothing). However based upon the title of this study, it does not appear to be relevant to the specific uses you propose to add.

Sincerely yours,

George T. LaRocca
Product Manager (15).
Insecticide-Rodenticide Branch
Registration Division (H7505C)

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To help prevent invasion of pests, treat a band of soil on and adjacent to the building foundation and crawl space entrance. Apply thoroughly!

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To help prevent invasion of outdoor activity areas, treat a band of soil and vegetation 6 to 10 feet wide around and adjacent to picnic areas, campgrounds, playgrounds, yards, patios and pet harborage. Apply thoroughly and uniformly to the band area, paying particular attention to areas of dense vegetation (long grass, weeds).

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*, *Soldiers*, *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, fuchsia, 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 *Army Worms*.

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

Do not reuse empty container. Wrap container and put in trash collection.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & 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 space spraying or surface applications. Do not use on humans. Vacate room after treatment and ventilate before reoccupying. 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 any body of water. 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.

967-9181
Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), this product is registered for use as a pesticide. It is not to be used in a manner inconsistent with the label. The EPA has determined that this product is not a hazardous waste under the Resource Conservation and Recovery Act (RCRA).
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