UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 7 1990

337 256711

Ms. Helen C. Theodore Fairfield American Corporation 309 Marrison Street Frenchtown, NJ 98825

Dear Ms. Theodoro.

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

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodentic. la 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 Doj 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 top: all amplication to ticks.
 - b. For perimeter treatment, the data should include outdoor application to various substrates, including wood, wrick, concrete, aluminum & miny's riding.
 - c. For band treatment, a study must be conduct 1 which indicates that the application w 11 indeed prevent entry by those pests.

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Company to the second

- 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)

BRMAN HI

GENERAL PURPOSE AQUEOUS INSECTICIDE

EPA REG. NO. 4816-696

EPA EST. NO. 279-N-1

- A PERMANONE Stable Emulsion insecticide
- READY TO USE
- For Domestic Use both Indoors and Outdoors.
- For Control of Flees, Premises and on Dogs Brown Dog Ticks and F 3
- Controls Fises and Ticks on Dogs for 35 Days
- Alde in Control of Ticks on Wests Dogs for an Additional 2
- For Control of Deer and Western Prantiess and on Dogs Black-lagged Ticks on

LCTIVE INGREDIENT:

NEAT MCREDIENTS: 98.50% 100.00%

*(3-phenoxyphenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcylopropanecarboxylate. Cis/trans rabb: min. 35% (+/-) cis and max. 65% (+/-) trans. PERMANONE - Registered Trademark of Fairfield American Corporation.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician immediately. Do not induce vomiting or give anything by mouth to an unconscious

person. IF INVALED: Remove affected person to fresh air. Apply artificial

respiration if indicated.

IF ON SKIN: Remove contaminated dothing and wash affected.

ses with scap and water IN EYES: Flush eyes w Flush eyes with plenty of water. Call a physician II

Store and it to read the

NET CONTENTS:



CUEPORATION FAIRFIELD **AMERICAN**

EDI ROUTE 17 NORTH, PUTHERFORD, NJ 07070

DIRECTIONS FOR USE

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

SHAKE WELL BEFORE USING

Affix trigger, pump or other type sprayer to container tion. Do not transfer to another container.

INDOOR APPLICATION

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

SUBEACE SPRAYING:

Substance of Cockroachee, Weterbugs, Pelmetto Bugs, Scorplons, Millipedes, Contipedes, Sowbugs, Pilibugs, Ants, Silverfish, Firebrats, Spiders, Crickets, Clover Miles, Cheese Miles, Granery Weevils, Rice Weevils, Confused Flour Beetles, Brust Red Flour Beetles, Drugstore Beetles, Meet Worms, Grain Miles and Cadelles. Direct the spray into hiding places, Grain Miles and crevices, and behind shelves and drawers. For silverfish, spray bookcases. For ants, srray trails, nests and points of

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 infected areas of shelving. Repeat treatment as nended.

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

To control Flees (adults and larvae) and Ticks, including the important Lyme disease vectors; the deer tick (txodes dammint) and the western black-legged tick (txodes pecificus) (adults and larvae): Thoroughly spray infested areas, pet back, resting querters, nearby cracks and derivides, along and behind baseboards, moldings, window and door frames, and entire areas of floor and floor covering. Fresh backing should be placed in animal querters following treatment. Repeat treatment as needed. Allow to dry thoroughly: before allowing pets to contact treated

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 cheets, closets, bureaus and other storages directing the spray into cracks, joints, and crevius. 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 thoroughly before use. è

ON: LIVESTOCK:
To protect calle (beef and d from Horn Files, Face Fill Greats: Apply a light mist su For face files, spray face arx

To control Stable Files, Horrale of 2 ounces per adult thoroughly. Repeat treatme give continued protection.

To control *Blood-aucking L* animal, using a stiff brush to Repeat every 3 weeks if req

To control *Peultry Lice*: Sp thoroughly. This should be with a fire mist.

To control Bedbugs and Alli of roost poles, cracks in with bedbugs and mites hide.

ON DOGS:

To control Flees, Ticks, Incl
vectors; the deer tick (Its
black-legged tick (Itsdee)
at the tail, moving the dispen
animal's entire body is coven
White spraying, fluff the hair,
etin. Make sure spray wets
or face. Avoid contact with (

weeks old. Not recommended

QUIDOOR APPLICATION

TO CONTROL DEER AI IREATMENT):
Use Permanone® General residual treatment for contro vectors for Lyme Disease, F Make a residual treatment a screens, enves, patics, gar spaces and other areas while

pests, treat a band of soil an and adjacent to the building foundation and crawl spa-entrance. Apply thoroughly (To help prevent invasion o 200

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 harborages. 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, dahlies, esters and other ornamentals to kill Japanese Beetles hit by spray as well as Whiteflies, Aphilds, Exposed Thrips, Solders, Rad Mites and Lesiminers. 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, azaless, begonias, camellias, camations, chrysanthemums, dahlias, delphiniums, dogwoods, English hy, euronymus, fuschia, geraniums, crassula, grape vines, Kentia palms, laurels, marigolds, mododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against Whitefliee, Aphids, Spider and Red Mites, exposed Thrips, Lace Bugs, Japanese Beetles, Psyement Ants, Clover Mites and Army Worms.

Why, spraying plants, do not operate closer than 18 inches. Use sweet, ing 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 snoking or eating. Avoid contamination of feed and foodstuffs. Flemove 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.

