

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jonathan S. Cohen
President
Summit Chemical Co.
7657 Canton Center Drive
Baltimore, MD 21224

MAR 23 2004

Subject: EPA Reg. No.: 6218-24
Permacide Plus
Label Amendment-Pesticide Registration Notice 2001-1
Submission Dated September 29, 2003
Label Amendment - Intended Usage
Submission Dated December 31, 2003
Label Amendment- Physical Hazard
Submission Dated February 23, 2004

Dear Mr. Cohen :

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following conditions:

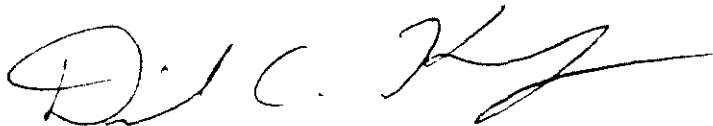
1. Revise the Precautionary Statements as follows: "Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, socks and shoes, and chemical resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, viton; selection category F). Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet."
2. Since the personal protective equipment is to be listed within the Precautionary Statements (see comment # 1 above), the list of personal protective equipment currently appearing under the separate section entitled "User Safety Recommendations" should be removed
3. Add "Note to Physician" in front of the statement "Contains an N-methyl carbamate that inhibits cholinesterase" and add the statements "May pose an aspiration pneumonia hazard. Contains Petroleum distillate." It is also recommended that The Note to Physician also address the following:
 - technical information on symptomatology

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- use of supportive treatments to maintain life functions
 - medicine that will counteract the specific physiological effects of the pesticide.
4. Replace "Avoid treating" with "Do not treat" in the *Serving Areas* Section. The sentence should be stated as follows: "Do not treat surfaces likely to be contacted by food."

Please submit five (5) draft copies of proposed labeling, incorporating the changes indicated above. If you have any questions or comments about this letter, please contact Stephanie Nguyen at 703-605-0702.

Sincerely,



Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

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ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 23 2004

PERMACIDE® PLUS

Under the Federal Insecticide
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
... 6218-24

INSECT SPRAY CONTAINING PROPOXUR

For Long-Term Residual Control Of Insects Which Have Become
Resistant To Other Insecticides
For Commercial, Industrial, Institutional and Homeowner Use
When Used As Directed. This Insecticide Product May be Applied in Food Processing Plants,
Restaurants, Warehouses, Homes, and Apartments
KILLS Roaches, Waterbugs, Ants, Brown Dog Ticks, Clover Mites, Crickets, Earwigs, Fleas, Flies, Millipedes,
Mosquitoes, Scorpions, Silverfish, Sowbugs, Spiders,
Saw-toothed Grain Beetles (exposed stage)

ACTIVE INGREDIENTS:

Propoxur, o-Isopropoxyphenyl methylcarbamate.....1%

INERT INGREDIENTS:

.....99%
Contains Petroleum distillates

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

Contains a N-methyl carbamate that inhibits cholinesterase

If inhaled Move person to fresh air
If person is not breathing call 911 or ambulance, then give artificial respiration,
Preferably mouth to mouth, if possible
Call a poison control center or doctor for further treatment advice.

If in skin Take off contaminated clothing.
Or clothing Rinse skin immediately with plenty of water for 15-20 minutes.
Call a poison control center or doctor for 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 eye.
Call a poison control center or doctor for treatment advise

If swallowed Immediately call a poison control center or doctor. Do not induce vomiting unless
Told to do so by a poison control center or doctor. Do not give any liquid to the
Person. Do not give anything by mouth to an unconscious person.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or
doctor, or going for treatment. You may also contact 1-888-740-8712 for emergency medical treatment
information.

EPA Registration No. 6218-24

EPA Establishment No. 6218-MD-2

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A PRODUCT OF
**SUMMIT
CHEMICAL CO.**

7657 Canton Center Drive

Baltimore, MD 21224

PERMACIDE® is a registered trademark of Summit Chemical Co., Baltimore, Maryland

**PRECAUTIONARY
STATEMENTS**

**HAZARDS TO HUMANS AND
DOMESTIC ANIMALS**

CAUTION

May be harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing of spray mist and provide adequate ventilation of area being treated. Contact with skin, eyes, or clothing should also be avoided. Wash thoroughly after using. Avoid contamination of food and utensils. Should poisoning occur, get prompt medical aid.

USER SAFETY RECOMMENDATIONS

Personnel Protection Equipment must include: long sleeve shirt and long pants
Chemical resistant gloves and
Shoes plus socks

ENVIRONMENTAL HAZARDS

This product is toxic to birds and wildlife. Keep out of lakes, streams, or ponds. Do not apply where runoff is likely to occur. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

PHYSICAL OR CHEMICAL HAZARDS

Combustible

Do not use or store near heat or open flame. Do not apply to junction boxes, switch boxes and conduits due to the possibility of shock hazard.

NET CONTENTS:

Insecticide for the Food Industry

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Summit PERMACIDE® PLUS

DIRECTIONS FOR USE

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

RESTRICTIONS: Do not use as a space spray. Do not use in edible products areas of food processing plants or in commercial food preparation areas except for careful crack and crevice treatment. Do not apply to rugs, draperies, wallpaper, or similar materials that may be stained. Avoid excessive wetting of plastic, rubber, and asphalt surfaces such as tiles and floor coverings. Do not apply this product in a way that will contact any person or pet, either directly or indirectly. Keep people and pets out of the area during application.

Entry Restrictions: Do not allow people or pets to enter the treated area until spray has dried.

User Safety Recommendations: Users should remove protective clothing and equipment immediately after handling this product. Wash the outside of gloves before removing. Keep and wash protective clothing and equipment separately from other laundry.

HOW TO USE: This insecticide product containing propoxur is ready-to-use undiluted as it comes out of the container, and may be applied with power-operated or hand sprayers.

INDOOR USE: HOUSEHOLD AND INDUSTRIAL APPLICATIONS OTHER THAN FOOD HANDLING ESTABLISHMENTS

SPOT TREATMENT: Ants, Cockroaches, Waterbugs, Crickets, Silverfish, Spiders, Scorpions, Saw-Toothed Grain Beetles (aids in control of the exposed stages of the saw-toothed grain beetle which come into contact with treated surfaces). Spray into cracks, crevices, around baseboards and other places where these insects hide. Apply behind and beneath cabinets, refrigerators, sinks, stoves, and in and around waste containers. For ants, spray trails and places where ants enter premises. Repeat as needed. Do not spray feedstuffs or house plants. Do not allow children to contact treated areas until surfaces are thoroughly dry.

FOOD HANDLING ESTABLISHMENTS: Places other than private residences in which food is held, processed, prepared, or served.

Ants, Cockroaches, Waterbugs, Crickets, Silverfish, Spiders and Saw-Toothed Grain Beetles (aids in the control of the exposed stages of the saw-toothed grain beetle which come into contact with treated surfaces)

Food Areas-- Application limited to CRACK AND CREVICE TREATMENT ONLY. Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups) Serving Areas

(when food is exposed and facility is in operation) also would be considered a food area. Apply in small amounts directly into cracks and crevices using equipment capable of delivering a pin stream of insecticide in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases, or hollow equipment legs where the above listed insects hide. Prior to application de-energize electrical equipment. After application allow time for oil to evaporate before starting motors or placing switches in "ON" position. Do not apply directly to electrical equipment or electrical boxes. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces. **APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE TREATMENT ARE NOT PERMITTED.**

Serving Areas—Facilities where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held. Apply as a **SPOT TREATMENT** to selective surfaces, such as baseboards, under elements of construction, into cracks and crevices. Avoid treating surfaces likely to be contacted by food. (Do not apply when facility is in operation or foods are exposed).

Non-Food Areas—Includes garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage rooms (after canning or bottling). Apply as a **SPOT TREATMENT** to baseboard areas, around water pipes, surfaces behind and beneath sinks, lockers, tables, pallets, and similar areas where insects hide or through which they may enter.

OUTDOOR USE: Ants, Clover Mites, Crickets, Earwigs, Fleas, Millipedes, Mosquitoes, Sow-bugs, and Brown Dog Ticks. Spray infested areas thoroughly including outside surfaces of screens, doors, window frames, foundations, paths, or other places where insects may enter. For ants, spray hills and runways. Repeat as necessary. Do not spray lawns or vegetation.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place. Do not store near heat or open flame.

PESTICIDE and CONTAINER DISPOSAL:

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

If partly filled: Call you local solid waste agency or Toll Free Phone 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.