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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 5 2004

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

Subject: Amendment - Responding to Agency's February 19, 2004 letter
Permacide P-II
EPA Reg. No. 6218-64
Your Letter Dated March 22, 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. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in black ink, appearing to read "George T. LaRocca".

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Summit

PERMACIDE® P-II

DIRECTIONS FOR USE Continued

INDOOR APPLICATION

Do not use in food areas of food-handling establishments, restaurants or other areas where food is commercially prepared or processed. May be used in the non-food areas of USDA-inspected meat and poultry plants, as well as the non-food areas of other food-handling establishments.

Non-Food/Feed Areas include (but are not limited to) garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, etc.

Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Vacate treated areas and ventilate before reoccupying. For maximum effectiveness, a combination of spot, surface treatment and fogging is recommended. Retreat if reinfestation occurs but not more than once every 2 weeks.

SURFACE SPRAYING: To control cockroaches, waterbugs, palmetto bugs, scorpions, millipedes, centipedes, sowbugs, pillbugs, ants, silverfish, firebrats, spiders, crickets, clover mites, cheese mites, granary weevils, rice weevils, confused flour beetles, rust red flour beetles, drugstore beetles, meal worms, grain mites and cadellles. Direct the spray into hiding places, cracks and crevices, and behind shelves and drawers. For silverfish, spray bookcases. For ants, spray trails, nests and points of entry.

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 infested areas of shelving.

To control bed bugs: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Allow all treated articles to thoroughly dry before use.

To control fleas and ticks (adults and larvae): Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, moldings, window and door frames. Fresh bedding should be placed in animal quarters following treatment.

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 chests, closets, bureaus and other storages, directing the spray into cracks, joints and crevices. 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 areas 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 the bedding, including mattresses and furniture that cannot be either laundered or dry cleaned. Allow all treated articles to dry thoroughly before use.

SPACE SPRAYING: Close doors and windows and shut off ventilating systems. Apply with a good machine adjusted to deliver a fine mist or fog. For rapid control of house flies, fruit flies, mosquitoes, skipper flies, wasps, hornets, bees, black flies, Angoumois grain moths, Mediterranean flour moths, Indian meal moths and tobacco moths: Direct spray at an upward angle, distribute it uniformly throughout the entire area at a rate of 1 ounce per 1000 cubic feet of space. Keep area closed for 2 hours. Ventilate before reoccupying.

FOGGING: To kill exposed or accessible stage of the above named crawling insects, use a rate of 1 gallon to 20,000 to 40,000 cubic feet of space. Contact insects directly when possible. Keep area closed for 2 hours. Ventilate before reoccupying.

ON LIVESTOCK: To protect cattle (beef and dairy), goats, sheep, hogs and horses from horn flies, face flies, house flies, mosquitoes and gnats: Apply a light mist sufficient to wet the surface of the hair. For face flies, spray face and head, but do not spray into eyes.

To control stable flies, horse flies and deer flies: Apply at a rate of 2 ounces per adult animal, sufficient to wet the hair thoroughly. Repeat treatment daily or at intervals necessary to give continued protection.

To control blood-sucking lice: Apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

To control poultry lice: Spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

To control bed bugs and mites in poultry houses: Spray crevices of roost poles, cracks in walls, and cracks in nests where the bed bugs and mites hide.

ON DOGS: To control fleas, ticks and lice: Start spraying at the tail, moving the dispenser rapidly and making sure that the animal's entire body is covered, including the legs and underbody. While spraying, fluff the hair so that the spray will penetrate to the skin. Use protective gloves (mitts) to prevent contact with hands. Make sure spray wets thoroughly. Do not spray into eyes or face. Avoid contact with genitalia. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.

NOTE: Do not use on animals under 12 weeks.

OUTDOOR APPLICATION

Do not allow spray treatment to drift on pasture land, cropland, poultry ranges or water supplies. Do not use on crops used for food, forage or pasture.

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, spiders, red mites and leafminers. Not for use on plants being grown for sale or other commercial use, or for commercial seed production or research purposes. 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, fuschia, geranium, crassula, grapevines, Kentia palms, laurels, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jew and zinnias.

Effective when used as a directive 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 degrees F. Contact insects directly whenever possible. Repeat treatment as infestations occur.

TICKS AND ADULT MOSQUITO CONTROL: Apply as a fine mist to thoroughly treat the entire area. For best results, treat when the wind velocity does not exceed 5 miles per hour. Treat shrubbery or vegetation where ticks and mosquitoes may rest. Apply at a rate of 2.5 pints per acre (0.9 fl. oz. per 1000 square feet). Using truck-mounted conventional misting equipment such as rotomist model's 51C, 91 or 100 HT traveling at 5 mph to treat a 300 foot swath, calibrate equipment to deliver 0.95 gallon per minute. Under no conditions should open water be treated with this product. Not to be used within 100 feet (30 meters) of lakes and streams.

Note:

this section has a spacing issue with words that we are aware of

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

ENVIRONMENTAL HAZARDS
 This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

DIRECTIONS FOR USE
 It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE.
 Use only on dogs, cattle, goats, sheep, hogs, horses.
 Avoid contamination of feed and foodstuffs.
 Remove pets and birds, and cover fish aquaria before space spraying or surface applications.

STORAGE AND DISPOSAL
 Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE AND SPILL PROCEDURES: Store upright at room temperature. Do not expose to freezing temperatures. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility in accordance with PR Notice 83-3.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.

CONTAINERS ONE GALLON AND SMALLER: Do not transport or store below 32 degrees F. Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herewith.

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