

6218-65



03/11/2004

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAR 11 2004

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

Subject: Amendment - Update First Aid and Disposal Statements
Permacide P-1
EPA Registration No. 6218-65
Your submission dated September 29, 2003

Dear Mr. Cohen:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below. A stamped copy of the label has been enclosed for your records.

1. Under the PRECAUTIONARY STATEMENTS section, move the statements "Avoid contamination of food...surfaces are dry." to the "Directions for Use" section. Revise the PRECAUTIONARY STATEMENTS section to read "Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."
2. Delete the title "Statement of Practical Treatment" from the front of the label.
3. Under the FIRST AID section of your label, add the following statement to the "IF SWALLOWED" section: "Have person sip a glass of water if able to swallow."
4. Under INDOORS, add the following sentence to the end of the paragraph "Also, treat your yard with a product registered for yard application."
5. Your label claim states that your product controls fleas and ticks on dogs for 35 days. However, under the "On Dogs" section of the label, your directions state that the user may repeat the application as necessary with no direction as to time interval. Please explain this discrepancy or indicate a time period for retreatment based on the residual efficacy of your product.

6. Either delete the phrases "Repeat as necessary," "Repeat treatment as needed" and "Repeat treatment daily or at intervals necessary to give continued protection" on your label or indicate a time period based on the residual efficacy of your product.
7. Add the following precaution to the paragraph under Outdoors "Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use. Do not use on edible crops."
8. Add the following statements to the "Directions for Use" section "Do not apply in classrooms when in use. Do not apply this product in occupied patient rooms or in any rooms/areas while occupied by patients, the elderly or infirm. Do not apply to institutions (including libraries, sports facilities, etc.,) in the immediate area when occupants are present."
9. Revise the sentence after OUTDOOR APPLICATION to read: "(As an aid in controlling these insects).
10. Add the following statement to the DIRECTIONS FOR USE section of the label: Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,



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

Enclosure

PERMACIDE® P-1

A Ready-To-Use PERMANONE Stable Emulsion

For Homeowner Use Both Indoors and Outdoors

To Control Fleas, Brown Dog Ticks and Lice On Premises and On Dogs

Controls Fleas and Ticks on Dogs for 35 Days
Aids in Control of Ticks on Dogs for an Additional 2 Weeks

Active Ingredients
Inert Ingredients

KEEP OUT OF REACH OF CHILDREN CAUTION FIRST AID	
If inhaled	Move person to fresh air. If person is not breathing, call 911 or ambulance. Give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If on skin or clothing	Take off contaminated clothing. Wash skin thoroughly with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If in eyes	Hold eye open and flush slowly and gently with water for 15-20 minutes. Remove contact lenses, if present. After the first 5 minutes, flush with clean, lukewarm running water. Call a poison control center or doctor for treatment advice.
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 anything by mouth to an unconscious person.

POISON PREVENTION: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-745-6272 for emergency medical treatment information.

Summit
CHEMICAL CO.

ACCEPTED
COMMENTS
In EPA Letho Label
MAR 11 2004

STORAGE AND DISPOSAL
Do not reuse empty container. Wrap container and put it 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 food or food stuffs. Remove pets and cover fish tanks before spraying. This product is not for use on humans. Do not allow children or pets to contact treated areas until surfaces are dry.

**STATEMENT OF PRACTICAL TREATMENT
FIRST AID**

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

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 advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not apply to water or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

Under the Federal Insecticide, Fungicide, and Rodenticide Act, registration is required.

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

SHAKE WELL BEFORE USE
Affix trigger, pump or other type sprayer to container for application.

INDOOR APPLICATION: FOR SPOT APPLICATION ONLY. Do not use as a space or surface spraying. To control cockroaches, waterbugs, palmetto bugs, scorpions, termites, firebrats, spiders, crickets, clover mites, cheese mites, granary weevils, rice weevils, drugstore beetles, meal worms, grain mites and Cedeles: Direct the spray into hiding places. For silverfish, spray bookcases. For ants, spray trails, nests and points of entry. To control carpet beetles: Spray edges of carpeting and under carpeting as needed. To control bedbugs: Spray mattresses lightly, particularly around tufts and seams. Take beddings and floors. Allow mattresses and other articles to dry thoroughly before use. Repeat treatment as needed. To control fleas and ticks (adults and larvae): Thoroughly spray infested areas, pet beds and behind baseboards, moldings, window and door frames, and entire areas of floor and quarters following treatment. Repeat treatment as needed.

To control clothes moths: Remove any infested articles from storage, brush thoroughly, spray liberally to empty chests, closets, bureaus and other storages directing the spray into crevices. To kill flea and louse eggs: Spray in an inconspicuous area to test for possible staining or discoloration. If no staining or discoloration occurs, spray entire area to be treated. Spray from a distance of 8 to 10 inches. Treat only those articles that cannot be either laundered or dry cleaned. Allow all treated articles to dry thoroughly before use.

ON LIVESTOCK: To protect cattle (beef and dairy), goats, sheep, hogs and horses from ticks: Apply a light mist sufficient to wet the surface of the hair. For face flies, spray face of animals. To control stable flies, horse flies and deer flies: Apply at a rate of 2 ounces per adult animal 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 control poultry lice: Spray roosts, walls and nests or cages thoroughly. This should be done at least once a week.

To control bedbugs and mites in poultry houses: Spray crevices of roost poles, cracks and other hiding places.

ON DOGS: To control fleas, ticks and lice: Start spraying at the tail, moving the dispenser forward, including the legs and underbody. While spraying, lift the hair so that the spray reaches the skin. Do not spray into eyes or face. Avoid contact with genitalia. Repeat as necessary.

NOTE: Not recommended for use on puppies less than four weeks old.

OUTDOOR APPLICATION: FOR CONTROL OF GARDEN INSECTS: For use against Japanese beetles, aphids, whiteflies, aphids, exposed thrips, spider mites and army worms. May be used on plants as a multi-purpose spray in small gardens and for spot treatments of garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, cannas, dogwoods, English ivy, geraniums, fuchsia, geraniums, crassula, grape vines, Kentia palm, plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against whiteflies, aphids, spider and red mites, exposed thrips and army worms.

When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Be cautious of wind. Do not spray plants when temperatures exceed 90 F. Contact insects directly when spraying.