



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 27, 2024

Tim McGonegal
Director of Regulatory Affairs
Summit Chemical Co.
235 S. Kresson St.
Baltimore, MD 21224

Subject: Label Amendment – Add toxic to bees language, directions for use on dogs to sublabel B, and marketing claims and icons
Product Name: Summit Permacide P-1
EPA Registration Number: 6218-65
Application Date: 1/26/2024
Case Number: 498128

Dear Tim McGonegal:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find

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or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Kaitlin Saunders at 202-566-2890 or at Saunders.Kaitlin@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is cursive and somewhat stylized.

Elizabeth Fertich
Product Manager 4
Invertebrate-Vertebrate Branch 1
Registration Division
Office of Pesticide Programs

Enclosure

[MASTER LABEL]

[Sublabel A: Residential Use Labeling]

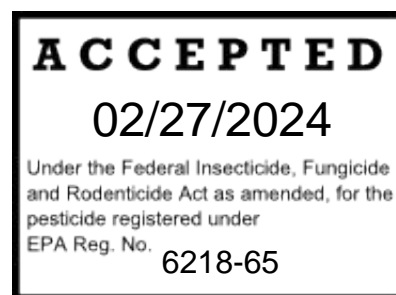
[Sublabel B: Clothing and Gear Repellent Labeling]

SUBLABEL A

SUMMIT *Responsible Solutions*

PERMACIDE® P-1

A Ready-To-Use Permethrin Emulsion



**For Residential Use Only, Both Indoors and Outdoors To Control fleas, Ticks, and
Lice On Premises and On Dogs**

ACTIVE INGREDIENTS:

*Permethrin0.50%

OTHER INGREDIENTS99.50%**TOTAL** 100.00%

*cis/trans ratio: min. 35% (+\ -) cis and max. 65% (+\ -) trans

CAUTION

KEEP OUT OF REACH OF CHILDREN

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • 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.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • 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. • Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> • 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 treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center, or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies, or pesticide incidents), you may contact the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu).	
See side panel for additional precautionary statements.	

EPA Reg. No. 6218-65
Contents: 24, 32 fluid ounces, 1 quart, 1 gallon

EPA Est. No. 6218-MD-2
Lot No. -----

Summit®

235 South Kresson Street Baltimore, MD 21224-2616
Phone: (410) 522-0661 Fax: (410) 522-0833
Toll-Free: (800) 227-8664

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

User Safety Recommendations

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Wash the outside of gloves before removing. **DO NOT USE ON CATS.** May be toxic or potentially fatal if applied to or ingested by cats. Accidental application to cats and/or grooming a recently treated dog may result in tremors and/or uncoordinated muscle movements. If this occurs, immediate veterinary care should be provided.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to aquatic organisms, including fish and invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. This pesticide is highly toxic to bees and other pollinating insects exposed to direct treatment on blooming crops and weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees or other pollinating insects are actively visiting the treatment area.

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 of sprayer to container for application. Do not transfer to another container. Application of products on pets must only be done indoors.

Use Restrictions:

- Do not apply this product in a way that will contact workers or other persons, either directly or through drift.
- Not for broadcast use.
- 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. Remove or cover exposed food and drinking water before application.
- Do not allow spray to contact food, feedstuffs or water supplies. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.
- Do not use treated article until spray has dried. Do not wet articles to point of runoff or drip.

General Precautions:

- Remove pets, birds, and cover fish aquariums before use.
- Not for use in outdoor residential misting systems.

INDOOR APPLICATION: FOR SPOT APPLICATION ONLY. Do not use as a space spray indoors. Also, treat your yard with a product registered for yard application.

SURFACE SPRAYING: To control cockroaches, waterbugs, palmetto bugs, scorpions, millipedes, centipedes, sowbugs, pillbugs, ants, silverfish, firebrats, spiders, crickets, clover moths, cheese mites, granary weevils, rice weevils, confused flour beetles, red flour beetles, drugstore beetles, meal worms, grain mites and cadelles; direct 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 applications to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving.

To control bedbugs; spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings, and floors. Allow mattresses and other articles to dry thoroughly 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, and window and door frames, and entire areas of floor and floor covering. 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 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-cleaned. Allow all treated articles to dry thoroughly before use.

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 bedbugs and mites in poultry houses; spray crevices of roosts, poles, cracks in walls, and cracks in nests where bedbugs 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.
NOTE: Do not use on animals under 12 weeks of age.

OUTDOOR APPLICATION: Do not use on edible crops. 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. 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, euonymus, fuschia geraniums, crassula, grape vines, Kentia palms, laurels, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jew and zinnias. Effective when used directly against whiteflies, aphids, spider and red mites, exposed thrips, lace bugs, Japanese beetles, pavement ants, clover mites, and armyworms. 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 contaminate water, food, or feed by storage or disposal.

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

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

If partly filled: Do not pour or dispose down-the-drain or sewer. Call your local solid waste Agency for local disposal options.

Notice: To the extent consistent with applicable law, the seller makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extends beyond the statements made on this label. To the extent consistent with applicable law, the seller shall not be liable for consequential, special or indirect damages resulting from the use, handling, application, storage or disposal of this product or for damages in the nature of penalties, and the buyer and the user waive any right that they may have to such damages.

SUBLABEL B

SUMMIT...*responsible solutions*[®]

PERMACIDE[®] P-I

Alternative Brand Name: [GREEN ARMOR[®]] [Summit Responsible Solutions[®] Green Armor[®]] [Summit[®] Green Armor[®]]
(KNIGHT SYMBOL)

Use on Clothing and Gear for Up to Six Washings of Protections From Ticks and Mosquitoes which may spread Lyme Disease, West Nile Virus, and Zika.
{ OPTIONAL MARKETING CLAIMS ON LAST PAGE }

ACTIVE INGREDIENTS:

*Permethrin	0.50%
OTHER INGREDIENTS	99.50%
TOTAL.....	100.00%

*cis/trans ratio: min. 35% (+\ -) cis and max. 65% (+\ -) trans

CAUTION

KEEP OUT OF REACH OF CHILDREN

See [back booklet] [panel] for additional precautionary statements and directions for Use

FIRST AID	
If swallowed	<ul style="list-style-type: none"> ● 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.
If on skin	<ul style="list-style-type: none"> ● Rinse skin immediately with plenty of water for 15-20 minutes. ● Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> ● 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. ● Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> ● 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 treatment advice.
HOT LINE NUMBER	
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[NOTE: The First Aid statement's grid format will be used if market label space permits; otherwise a paragraph format will be used.]

EPA Reg. No. 6218-65
 Contents: 24, 32 fluid ounces, 1 quart, 1 gallon

EPA Est. No. 6218-MD-2
 Lot No xxxxx

Summit®

235 South Kresson Street
 (410) 522-0661 Toll-Free: (800) 227-8664

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DIRECTIONS FOR USE

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DO NOT USE ON CATS

SHAKE WELL BEFORE USE. Do not transfer to another container. Application of products on pets must only be done indoors.

CLOTHING:

To repel and kill mosquitoes, chiggers, mites, and Ticks, including Deer Ticks that may carry Lyme disease and Rocky Mountain spotted fever.

This product should be applied directly to clothing, outdoor gear, and shoes and allowed to dry prior to wearing or prior to using in the field. This product must not be applied to clothing while it is being worn. Under no circumstances should this product be applied directly to humans.

- Do not spray directly on or otherwise allow to come into contact with skin, face, or eyes.
- This product is intended to be used on clothing and exterior gear only, such as backpacks, parkas, tents, or bed nets.
- Make all applications outdoors in a well-ventilated area.

For up to six-week protection against Ticks, Chiggers, mites, and mosquitoes apply the product to articles outdoors under conditions free from wind.

- Spray outer surfaces only, while either hanging or on a flat surface. Use a sweeping motion to ensure the entire surface of the fabric is covered maintaining a distance of 6-8 inches from the surface of the fabric.
- Treat the front, back, and sides of the outfit or other outdoor textile and allow to dry for at least 2 hours. It is important to concentrate on areas the pest may seek to enter your clothing such as, socks, bottoms of trousers, and cuffs. You may repeat these directions after six weeks of use.

(For 32 ounce Bottle)

One bottle will treat 7 full outfits. Use 4.5 ounces per outfit, approximately 1/7 of the bottle. The treatment should wet the fabric enough to notice a color change as if the article was wet with water.

(For 24 ounce Bottle)

One bottle will treat 5 full outfits. Use 4.5 ounces per outfit, approximately 1/5 of the bottle. The treatment should wet the fabric enough to notice a color change as if the article was wet with water.

(For 1 Gallon Bottle)

One gallon bottle will treat up to 28 full outfits. Use 4.5 ounces of product per outfit. May be used as a refill for the 32 ounce bottle or applied with your own compression or trigger sprayer. The treatment should wet the fabric enough to notice a color change as if the article was wet with water.

It has been shown through field experience that further tick and flea prevention can be achieved by sealing the bottoms of trousers using tape or by tucking into socks.

For further protection, use in conjunction with an USEPA approved insect repellent registered for direct application to the skin and utilize the following primary preventive measures. Avoid walking in areas where the pests are found, wear appropriate protective clothing (light-colored, long-sleeved shirt and long pants tucked into socks) and inspect body daily for ticks.

MOSQUITO NETS, TENTS, SLEEPING BAGS, BACKPACKS, SCREENS, CAMPING LOUNGES, SLEEPING PADS AND TENT FOOTPRINTS:

- Only treat outsides of products.
- Do not treat surfaces which come in direct contact with skin. Spray outdoors or in a well-ventilated area when wind is calm.
- Either hang or lay out gear so areas to be treated are easily accessible. Spray maintaining a distance of 6-8 inches and treat all exterior areas of fabric.
- Continue spraying until surfaces are moist and allow at least 2 hours to dry prior to use.
- Do not treat more than once every six weeks.

ON DOGS

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.

NOTE: Do not use on animals under 12 weeks of age.

STORAGE AND DISPOSAL

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

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

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

If partly filled: Do not pour or dispose down-the-drain or sewer. Call your local solid waste Agency for local disposal options.

Notice: To the extent consistent with applicable law, the seller makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extends beyond the statements made on this label. To the extent consistent with applicable law, the seller shall not be liable for consequential, special or indirect damages resulting from the use, handling, application, storage or disposal of this product or for damages in the nature of penalties, and the buyer and the user waive any right that they may have to such damages.

OPTIONAL MARKETING STATEMENTS

SUBLABEL A

- A Ready-To-Use Permethrin Stable Emulsion Insecticide
- For Indoor/Outdoor Residential Use and in Kennels
- For Control of Fleas, Ticks and Lice on Dogs
- Controls Fleas and Ticks on Dogs for 35 Days
- Aids in Control of Ticks on Dogs up to 6 Weeks

SUBLABEL B

- For Control of Ticks which may carry Lyme disease and Rocky Mountain Spotted Fever around Homes & Campsites
- Perfect For all outdoor activities such as Hunting, Fishing, Camping, & Scouting
- Insect Repellent
- OUTFITTERS SPRAY
- Permethrin for Dogs [For Use on Dogs]
- For Control of Fleas, Ticks and Lice on Dogs
- Controls Fleas and Ticks on Dogs for 35 Days
- Aids in Control of Ticks on Dogs up to 6 Weeks
- [Easy Application] Trigger Sprayer [Included]
- Treatment for Gear, Mosquito Netting, Nets, Tents, Canopies, Screen Enclosures, Sleeping Bags, Backpacks, Ground cloths, Hammocks and Camping Chairs.
- Repels & Kills Ticks, Chiggers, Mites and Mosquitoes
- Repels and Kills Ticks which may carry Lyme Disease and Rocky Mountain Spotted Fever
- Effective for 6 (six) Weeks [42 days] [Lasts up to 6 weeks] [even after washing]
- Effective through six (6) washings [Lasts up to 6 launderings]
- Effective for 42 days or 6 washings
- Odorless Permethrin

- A Treatment for Clothing [and Gear] [and Mosquito Netting, Nets, Tents, Canopies, Screen Enclosures, Sleeping Bags, Backpacks and Ground cloths]
 - Permethrin Insect Repellent
 - Repels and Kills Mosquitoes and Ticks
 - Does not harm [any] fabrics or finishes when used as directed
 - Odorless Insect Repellent
 - Do not Apply Directly to Skin
 - Apply to Fabrics, tents and gear only
 - Resealable Label Open Here for Directions and Precautions
 - CLOTHING & GEAR TREATMENT
 - Apply to Clothing and Gear – protection up to 6 weeks
 - 33% more than other’s 24oz bottles
 - Permethrin Ready-To-Use Insect Repellent
-
- Graphics and/or symbols (Green Knight)



PRODUCT FACTS

What it is:	Permethrin Insect Repellent for treating clothing, tents, sleeping bags, footwear, and other outdoor gear
Kills & Repels:	Ticks, Mosquitoes, Chiggers, Mites for up to 6 weeks, even after laundering
How to Use:	Hang or lay out clothing and gear and spray all exterior surfaces until moist, allow to dry before using
Further Protection:	Use in conjunction with an EPA registered insect repellent designed for exposed skin protection [Controls Fleas and Ticks on Dogs for 35 Days]
Coverage:	One quart bottle treats up to 7 full outfits. Contains 33% more than other's 24oz bottles

