

6218-66

11/20/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOV 20 2008

Mr. Jonathan S. Cohen
President
Summit Chemical Co.
235 S Kresson Street
Baltimore, MD 21224

RE: Notification to Update Label from PR Notice 2008-1
EPA Registration Number: 6218-66
Date of Submission: August 7, 2008

Dear Mr. Cohen:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, August 7, 2008, for the product, Permacide P Concentrate. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 6218-66	2. EPA Product Manager PM#	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Permethrin P Concentrate		
5. Name and Address of Applicant (Include ZIP Code) Summit Chemical Co. 235 S Kresson Street Baltimore, MD 21224 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION <input checked="" type="checkbox"/> EPA Reg. No. _____ NOV 20 2008 Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification letter enclosed to Update labeling from PR notice 2008-1

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name JONATHAN S. COHEN	Title PRESIDENT	Telephone No. (Include Area Code) 410-522-0661
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature Jonathan S. Cohen	3. Title PRESIDENT	C O O O O O O O O O C C C C O O C C C C O O C C C C O O C C C C O O C C C C O O C C C C O O C C C C O O C C C C O O
4. Typed Name JONATHAN S. COHEN	5. Date 8/7/08	

Summit®

...responsible solutions

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235 South Kresson Street
Baltimore, MD 21224-2616

July 9, 2008

Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Re: EPA Reg. No. 6218-66; Permacide P Concentrate
PR Notice 2008-1

Dear Gentlemen:

We are responding to the PR Notice 2008-1 and would like to use the corresponding environmental hazard statement on the product label as follows:

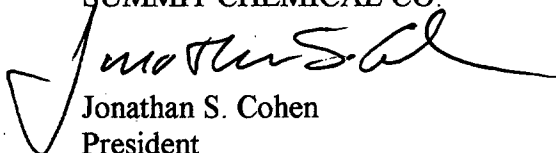
“To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinising application equipment over the treated area will help avoid run off to water bodies or drainage systems.”

Notification of label change relative to PR Notice 2008-1. This notification is consistent with the guidance in PR Notice 2008-1 and the requirments with EPA's regulations at 40 CFR 156.10, 40 CFR 156.80 and 40 CFR 152.43, and no other changes has been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the guidance of PR Notice 2008-1 And the requirments of 40 CFR 156.10, 40 CFR 156.80 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

If we can be of further assistance in this matter please contact our office.

Sincerely,

SUMMIT CHEMICAL CO.



Jonathan S. Cohen
President

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NOTIFICATION

NOV 20 2008

PERMACIDE P CONCENTRATE

For Use Outdoors and in Home and Non-Food Areas of Commercial Buildings, Institutions, Warehouses, Theaters, Office Buildings, Schools, Motels, Hotels, Restaurants, Food/Feed Processing Establishments and Kennels.
Kills Gypsy Moth Caterpillars and Japanese Beetles Outdoors
Recommended for Commercial/Agricultural Use

ACTIVE INGREDIENTS:

*Permethrin: (3-phenoxyphenyl)methyl (+/-) cis/trans
3-2(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate...10.0%

INERT INGREDIENTS.....90.0%

Contains petroleum distillates Total 100.0%

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

CAUTION-KEEP OUT OF REACH OF CHILDREN

EPA Registration No. 6218-66

EPA Est. No. 6218-MD-2

A Product of
Summit Chemical Co.
Baltimore, MD

NET CONTENTS 1 PINT

CAUTION-KEEP OUT OF REACH OF CHILDREN

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, if possible.

IF ON SKIN OR CLOTHING: Take off contaminated 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 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 poison control center or doctor, or going for treatment. You may also contact 1-888-740-8712 for emergency medical treatment information.

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

PERMACIDE P CONCENTRATE
Summit Chemical Co.

Baltimore, MD

PERMACIDE is a registered trademark of Summit Chemical Company

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin and clothing. Wash thoroughly after handling. Remove and wash clothing before reuse. Avoid contamination of food and feed.

Wear full-faced gas mask with canister type recommended for general insecticide protection when applying indoors as a space spray or fog.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface water. 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 treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

PHYSICAL HAZARDS

Do not use or store near heat or open flame.

Storage and Disposal

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

PESTICIDE STORAGE AND SPILL PROCEDURES: Store upright at room temperature. 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: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

CONTAINER DISPOSAL: Plastic Quart Containers: Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

DIRECTIONS FOR USE

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

To prepare dilutions, the concentrate should first be stirred or agitated well. Add the required amount of concentrate to water and blend thoroughly. Do not hold dilutions for more than 24 hours.

For maximum effectiveness, a combination of localized application and space treatment is recommended. Remove pets, birds and cover fish aquaria before spraying. 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.

Do not use in edible product areas of food/feed processing plants, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed. May be used in the non-food areas of USDA-inspected meat and poultry plants.

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, and storage (after canning or bottling).

INDOOR USE AREAS

BAKERIES, KENNELS, BEVERAGE PLANTS, MEAT PACKING PLANTS, CANNERIES, MOTELS, FLOUR MILLS, OFFICE BUILDINGS, FOOD PROCESSING PLANTS, RAILROAD CARS, GRAIN ELEVATORS, RESTAURANTS, GRANARIES, SCHOOLS, HOMES, SHIP'S HOLDS, HOSPITALS, SUPERMARKETS, HOTELS, TRUCK TRAILERS, INDUSTRIAL INSTALLATIONS, AND WAREHOUSES.

AS A SURFACE SPRAY: For initial clean up of sever insect infestation, dilute at a rate of 1 part concentrate in 10 parts water (13 fluid ounces per gallon). For normal dilute 1 part concentrate in 19 parts water (6.7 fluid ounces per gallon).

TO CONTROL: Cockroaches, Waterbugs, Palmetto Bugs, Ants, Silverfish, Firebrats, Spiders, Crickets, Millipedes, Centipedes, Sowbugs, Pillbugs, Clover mites, Cheese mites, Granary weevils, Rice weevils, Confused flour beetles, Rust red flour beetles, Sawtoothed grain beetles, Spider beetles, Cigarette beetles, Drugstore beetles, Mealworms, Grain mites, and Cadelles:

Use a good sprayer adjusted to deliver a coarse wet spray. Direct the spray into hiding places, cracks and crevices, under pallets, around containers of stored foods, around the base of machinery, and behind shelves and drawers. Spray bookcases for silverfish. Spray ant trails, nests and points of entry. If surface application is to be used, spray floors, walls and other surfaces applying at a rate of 1 gallon to 750 square feet of surface.

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, and localized areas of floor and floor covering. Fresh bedding should be place in animal quarters following treatment. To kill fleas and ticks on dogs, and to obtain protection against reinfestation, dilute at 1 part concentrate to 19 parts water (6.7 fluid ounces per gallon) and wet the animal by dipping or spraying. DO NOT TREAT PUPPIES LESS THAN FOUR WEEKS OLD. Wear gloves when dipping animals. Do not use this or any other pesticide on sick, old, or debilitated animals.

TO CONTROL: Carpet beetles, spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, closets and infested areas of shelving. Repeat treatment as needed.

TO CONTROL: Bedbugs, spray mattresses lightly, particularly around tucks 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. Repeat treatment as needed.

TREATMENT OF FLYING INSECTS RESTING PLACES: To Aid in control of Mosquitoes, Wasps, Gnats, Skippers, treat walls, ceilings, moldings, screens, door frames, window frames, beams, light cords and similar resting places using the above dilution of 1:19.

AS A SPACE SPRAY: Dilute at a rate of 1 part concentrate to 19 parts water (6.7 fluid ounces per gallon). Apply with mechanical or compressed air equipment (non-thermal) adjusted to deliver a fine mist. Close doors and windows and shut off ventilating systems. For rapid control of house flies, fruit flies, gnats, mosquitoes, skipper flies, wasps, hornets, bees, black flies, Angourmois grain moths and tobacco moths, direct spray at an upward angle distributing it uniformly through the entire area at a rate of 1 ounce per 1000 cubic feet of space. Keep area close for at least 10 minutes. Vacate areas after treatment and sweep up dead insects before reoccupying.

For rapid kill of exposed or accessible stages of other insects named on this label, dilute 1 part concentrate in 19 parts water (6.7 ounces per gallon). Apply using conventional mechanical or compressed air equipment (non-thermal), following directions for spaces spraying. Apply the above dilutions at a rate of 1 ounce per 1000 feet of space.

OUTDOOR USE AREAS

CORRALS, DRIVE-IN RESTAURANTS, DRIVE-IN THEATERS, FEEDLOTS, GARDENS, GOLF COURSES, PARKS, PLAYGROUNDS, RECREATIONAL AREAS, URBAN AREAS, AND ZOOS.

FOR TEMPORARY REDUCTION OF ANNOYANCE FROM: Ticks, Flies, Gnats, Mosquitos in drive-in restaurants, drive-in theaters, golf courses, urban areas, parks, playgrounds and other recreational areas. Dilute 1 part concentrate in 40 parts water (3.2 ounces per gallon of water). Direct the spray into tall grass, shrubbery and around lawns, where these pests may hover or rest. Apply while the air is still and avoid wetting foliage. Application should be dry prior to use. Repeat as necessary.

In treatment of corrals, feedlots, swine lots and zoos, cover any exposed water, drinking fountains and animal feed before application. Fill the area with mist and direct the spray into tall grass, shrubbery and around lawns where the above pests may hover or rest. Apply while the air is still and avoid wetting foliage. In zoos, prevent exposure of reptiles to the product. Repeat as necessary.

TO KILL: Gypsy moth caterpillars and adults, adult Japanese beetles, and Eastern and Forest tent caterpillars on contact, combine 3.2 fluid ounces of concentrate per 1 gallon of water. Apply to ensure thorough coverage of upper and lower surfaces. Under no conditions should open water be treated with this product. Not to be used within 100 feet(30 meters) if lakes and streams.

On Trees and Shrubs: Treat trees and shrubs as soon as insects emerge (usually late spring). Treat leaves, branches, and tree trunks evenly, making sure to penetrate dense foliage. Repeat application every 7 days as necessary for control.

On Roses and in Flower Gardens: Treat plants and flowers as insect appear. Spray plants and flowers making sure to penetrate dense foliage. Repeat application every 7 days or as necessary for control.

PERMACIDE-Registered Trademark of Summit Chemical Company

NOTIFICATION

NOV 20 2008