



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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JAN -7 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Troy Munson
Regulatory Compliance Specialist
Athea Laboratories, Inc.
P.O. Box 240014
Milwaukee, WI 53224

Subject: Amendment - Revised First Aid Statements
Permicide
EPA Registration No. 10088-95
Your submission dated March 7, 2003

Dear Mr. Munson:

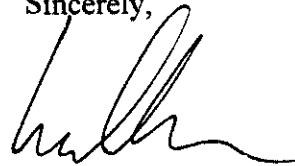
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below.

1. Under the "Precautionary Statements" section of your label, please move the statements "Avoid contamination of feed...surfaces are dry." to the "Directions for Use" section of your label.
2. Add/revise the following statements after the sentence "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."
3. Either delete the phrases "Repeat treatment as needed" and "Repeat treatment as infestations occur" or indicate a time period for retreatment based on the residual efficacy of your product.
4. Either delete the phrase "...or at intervals necessary to give continued protection." or indicate an appropriate interval for retreatment based on the residual efficacy of your product.
5. Modify the phrase "...until surface is wet" to read "...until surface is wet but not to the point of runoff."
6. Delete the statement "Retreat as necessary" under the section for "Dogs". Your label claim indicates that your product is effective in controlling fleas and ticks on dogs for 35 days.

7. Add "medicated, pregnant, or nursing" to the statement "Do not use on old, sick, or debilitated animals."
8. Add "Allow all treated articles to dry thoroughly before use" to the bedbug directions.
9. On the front panel, add "Read Entire Label Before Each Use."
10. Since the product is in Toxicity Category IV for all routes of exposure, you may remove the signal word on the front and rear panel and the statement "Hazards to Human and Domestic Animals." You may also delete the First Aid statements.

A stamped copy of the label has been enclosed for your records. 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

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS**

CAUTION

Wash thoroughly after handling and before smoking or eating. Avoid contamination of feed and feedstuffs. Remove pets and birds and cover fish aquaria before space spraying or surface applications. Do not use on humans. Vacate room after treatment and ventilate before re-occupying. Do not allow children or pets to contact treated areas until surfaces are dry.

FIRST AID

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

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378. For information on product, usage, etc., call 1-800-743-6417.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and 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 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:

CONTAINERS ONE GALLON AND SMALLER: Do not reuse container. Wrap container in several layers of newspaper and discard in trash.

CONTAINERS LARGER THAN ONE GALLON:

Metal Containers - Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved of by State and local authorities.

Plastic Containers - Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Glass Containers - Triple rinse or equivalent, then dispose of in a sanitary landfill or by other approved State and local procedures.

PERMICIDE

FOR COMMERCIAL/AGRICULTURAL USE ONLY.

A READY-TO-USE STABLE EMULSION INSECTICIDE.

FOR USE OUTDOORS, IN HOMES AND NON-FOOD AREAS OF FOOD/FEED PROCESSING ESTABLISHMENTS, KENNELS, COMMERCIAL BUILDINGS, WAREHOUSES, THEATERS, OFFICE BUILDINGS, SCHOOLS, MOTELS AND HOTELS.

FOR CONTROL OF FLEAS, BROWN DOG TICKS AND LICE ON PREMISES AND ON DOGS.

FOR CONTROL OF TICKS WHICH MAY CAUSE LYME DISEASE ON PREMISES.

CONTROLS FLEAS AND TICKS ON DOGS FOR 35 DAYS.

AIDS IN CONTROL OF TICKS ON DOGS FOR AN ADDITIONAL 2 WEEKS.

ACTIVE INGREDIENT:

* Permethrin 0.50%
INERT INGREDIENTS: 99.50%
TOTAL 100.00%

*(3-phenoxyphenyl) methyl (±) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate. Cis/trans ratio: min. 35% (±) cis and max. 65% (±) trans.

KEEP OUT OF REACH OF CHILDREN CAUTION

See Side Panel For Additional Precautionary Statements.

EPA REG. NO. 10088-95 EPA EST. NO. 10088-WI-1

NET CONTENTS: One Quart
 1 5 20 30 35 55 GALLONS

ACCEPTED
with Manufactured By:
in EPA Reg. No. 10088-95

Athea Laboratories, Inc.
JAN - 7 2004
P.O. Box 240014

Milwaukee, WI 53224

Under the Federal Insecticide, and Fungicide Act, this pesticide is registered, for the pesticide registered under EPA Reg. No.

10088-95

DIRECTIONS FOR USE

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

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climactic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

SHAKE WELL BEFORE USING.

INDOOR APPLICATION:

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. 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/feed should be covered or removed.

Nonfood/feed areas are areas such as 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).

Vacate treated areas and ventilate before reoccupying. For maximum effectiveness, a combination of spot, surface treatment and fogging is recommended.

Do not apply to classrooms while in use.

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 CADELLES: 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. Repeat treatment as needed.

TO CONTROL BEDBUGS: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as needed.

TO CONTROL FLEAS (ADULTS AND LARVAE) AND TICKS, INCLUDING TICKS WHICH MAY CARRY LYME DISEASE (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 entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. Repeat treatment as needed. Allow to dry thoroughly before allowing pets to contact treated areas.

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 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.

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*, *Gnats*, *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, distributing 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 stages of the above named crawling insects, use at 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 BEDBUGS AND MITES IN POULTRY HOUSES: Spray crevices of roost poles, cracks in walls, and cracks in nests where the 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. Make sure spray wets thoroughly, but do not saturate animal. Do not spray into eyes or face. Avoid contact with genitalia. Use protective gloves or mitts when applying product. Repeat as necessary. NOTE: Do not use on puppies less than twelve (12) weeks old. Do not use on old, sick or debilitated animals. DO NOT USE ON CATS OR KITTENS. 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.

OUTDOOR APPLICATION:

TO CONTROL TICKS, INCLUDING TICKS WHICH MAY CARRY LYME DISEASE (PERIMETER TREATMENT): Use this product as a residual treatment to control *Ticks* including the *Deer Tick (Ixodes dammini)*, *Lone Star Tick (Amblyomma americanum)*, *Brown Dog Tick (Rhipicephalus sanguineus)*, *American Dog Tick (Dermacentor variabilis)* and *Western Black-legged Tick (Ixodes pacificus)*.

For each areas listed below, apply until surface is wet (approximately 1 gallon/750-1,000 ft²).

Treat around windows and doors, porches, screens, eaves, patios, garages, under stairways and in crawl spaces where these pests may enter.

Treat a band of vegetation and leaf litter 6 to 10 feet wide around and the outside of buildings to help control ticks occurring there.

To help control ticks in outdoor activity areas, treat a band of vegetation and leaf litter 6 to 10 feet wide and adjacent to activity areas, especially where dense vegetation occurs.

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. 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, geraniums, crassula, grape vines, Kentia palms, laurels, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

EFFECTIVE WHEN USED AS DIRECTED 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.

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, but do not apply when wind speeds exceed 10 miles per hour. Treat shrubbery or vegetation where mosquitoes may rest. Apply at a rate of 2.5 pints per acre (0.9 ounce per 1000 sq. ft.) Using truck mounted conventional misting (Ultra Low Volume or ULV) equipment traveling at 5 mph to treat a 300 foot swath, calibrate equipment to deliver 0.95 gallons 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.

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

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