



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 24, 2001

Mr. Lee Tharrington
Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, FL 33762

Subject: Submission of Additional MRID Citations to Support Efficacy Claims
Unicorn .25 Permethrin WB
EPA Reg. No. 28293-261
Your Letter Dated April 2, 2001

Dear Mr. Tharrington:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

- 1) Either remove all "Repeat treatment as signs of reinfestation occur" statements from your label or qualify by stating the minimum allowable time interval between applications. This should be based on the efficacy data cited in support of your product and the duration claims currently claimed.
- 2) For all crack and crevice, baseboard, carpet and furniture treatments, please add the statement: "Spray to the point of dampness but not run-off".
- 3) Please remove all references to the application of your product to bedding. Exposure to adults and children from treated bedding has not been fully evaluated.

- 4) Unfortunately, the MRIDs provided to you by Aventis were again unacceptable. The first MRID (MRID 44858204) included active ingredients that are not part of your product. The second MRID (MRID 41851709) had been previously cited by you and had been found unacceptable (see our letter of November 24, 2000). At this point in time we will allow you to keep your flea and tick claims on your label and will pursue efficacy responsibilities with Valent Biosciences Corporation. They will need to submit or cite data that will support their efficacy claims or remove these pests from their label. If this occurs you will have to submit or cite additional data to support your claims or remove them from your label at that time.

If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

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

UNICORN

.25 PERMETHRIN WB

- ◆ For Domestic Use both Indoors and Outdoors
- ◆ A Ready-To-Use Stable Emulsion Insecticide
- ◆ Provides 180 Day (6 Months) Control of Roaches, including the German and American Cockroach.
 - ◆ For Control of Fleas, Brown Dog Ticks and Lice on Premises and on Dogs
 - ◆ Controls Fleas and Ticks on Dogs for 14 Days
 - ◆ For Control of Pests on Livestock
- ◆ Quick-Kill Formula
- ◆ Long Lasting Control
- ◆ Kills Hidden Bugs
- ◆ Water Base

Use Indoors - Spray hiding places, cracks and crevices.

Use Outdoors- Treat around windows, doors, porches, screens, patios and garages.

Product Usage: Kills nuisance insects (as listed on the label) in and around the home, fleas and ticks on dogs.

Use on: In cracks and crevices where insects hide, around windows and doors, where insects enter the home.

Amount to Use: Ready to use, no mixing required.

ACTIVE INGREDIENT:

Permethrin *0.25%

INERT INGREDIENTS:99.75%

Total:100.00%

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

Cis/trans ratio: Min. 35% (+) cis, Max. 65% (+) trans

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side/back panel for Additional Precautionary Statements.

NET CONTENTS:

Manufactured by:
Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, FL 33762
(727) 578-4545

ACCEPTED
with COMMENTS
in EPA Letter Dated
AUG 24 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
28293-261

EPA EST. NO. 62478-FL-1A
44616-MO-1B

Subscript used is first letter
of run code on container.

◆ READ ENTIRE LABEL BEFORE EACH USE.

◆ FOR PET USE - USE ONLY ON DOGS.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Wash thoroughly after handling and before smoking or eating. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fishaquaria before surface applications. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry. 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.

FIRST AID	
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 eye. • Call a poison control center or doctor for treatment advice.
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 SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • 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.
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 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.	

Environmental Hazards

This product is extremely 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.

DIRECTIONS FOR USE

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

Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container.

SHAKE WELL BEFORE USING

INDOOR APPLICATION

For spot application only. Do not use as a space spray indoors. Do not apply to classrooms while in use. 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.

Surface Spraying:

For control of **Cockroaches (180 day/6 month control), 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, Sawtoothed Grain Beetles, Spider Beetles, Cigarette Beetles, Drugstore Beetles, Darkling Beetles, Meal Worms, Grain Mites and Cadollos:** 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 signs of infestation occur.

To control **Bedbugs:** Spray mattresses lightly, particularly around tufts and seams. After mattress is dry, cover with mattress cover and sheet. Do not use mattress without cover. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as signs of infestation occur.

To control **Fleas (adults and larvae) 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 entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. Repeat treatment as signs of infestation occur. 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. After mattress is dry, cover with mattress cover and sheet. Do not use mattress without cover. 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 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. Reapply everytwo (2) weeks as needed.

NOTE: Do not use on puppies under twelve (12) weeks of age. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals or animals on medication.

DO NOT USE ON CATS OR KITTENS.

OUTDOOR APPLICATION

Not for use on plants being grown for sale or commercial seed production or for research purposes.

TO CONTROL TICKS (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 area listed below, apply until surface is wet (approximately 1 gal/750-1000 sq. ft.).

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 6-10 feet wide and adjacent to activity areas, especially where dense vegetation occurs.

FOR CONTROL OF GARDEN INSECTS:

For use on roses, dahlia, 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.

STORAGE AND DISPOSAL

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

STORAGE: Store in a cool dry area away from heat or open flame. Store above 32°F.

DISPOSAL: 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.