



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 16 2006

H.R. MCLANE, AGENT FOR CTX-CENOL, INC.
7210 Red Road, Suite 206A
Miami, Florida 33143-5321

Subject: Amendment - Addition of Clothing Treatment
Perma-Tox Insecticide E.C.
EPA Reg. No. 45385-69
Your application dated September 1, 2005

Dear Mr. McLane:

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 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.

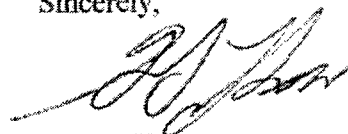
1. Delete reference to military clothing, uniforms, gear, battle dress uniform, the MSN and military specification numbers. The product you cited with these uses is for military use only. There was no information submitted authorizing use of this product for military purposes nor information stating that this product formulation meets military specifications. Thus limit the directions and use sites to "Outer Clothing and Bed Nets only.
2. Revise the mixing directions to reflect a 0.5% application rate, i.e. 1 1/3 oz in 1 quart of water. This is the maximum application rate for consumer treated clothing.
3. Delete the misuse statement under directions for outer clothing and bed nets. It already appears under Directions for Use on the left panel of the label.
4. Under Directions for use delete the statements beginning, "Keep away from food, eating utensils... and ending....contaminated with this product". These precautions pertain to military uses.
5. Following the last sentence under directions for outer clothing and bed nets add, "For further protection use in conjunction with an insect repellent registered for direct application to exposed skin".
6. Delete the first sentence under application procedure. This precaution pertains to EPA Reg. No. 63021-1.

- 7. Revise the first statement under For Clothing to read, "Dilute 1 1/3 oz into 1 quart of water in a 1 quart hand trigger sprayer". Replace the statement "Do not treat clothing a second time; one treatment is effective for life on the garment", with, "Follow standard laundering procedures. Clothing should be retreated after four weeks or after the sixth laundering to maintain adequate protection. Do not retreat clothing more than once every two weeks. Launder clothing at least once before retreating".
- 8. Note that this product is in child resistant packaging. Therefore you cannot have a separate 2 ounce bottle. The product must be mixed and diluted from the original container as indicated in comment 7 above.

Submit a formulators exemption statement and a updated data matrix that includes product chemistry and acute toxicity data. You only listed efficacy data on the matrix.

If you have any questions in regard to this letter please feel free to contact me at 703-305-6100.

Sincerely,



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

Enclosure

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.
WARNING: Causes eye irritation. Do not get in eyes. Avoid contact with skin or clothing. Harmful if swallowed. Avoid breathing vapor. Wash thoroughly after handling. For space spraying indoors wear NIOSH or MSHA approved respiratory protection device. Do not allow people or pets to enter treated areas until spray mist or fog has dissipated and treated surfaces are dry.

FIRST AID

IF SWALLOWED - 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 by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES - Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. 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 this product container or label with you when calling a poison control center, or doctor, or when going for treatment. You may also call 1-800-858-7378 for emergency medical treatment advice. *NOTE TO PHYSICIAN: Solvent presents aspiration hazard. Gastric Lavage is indicated if taken internally.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. **BEE WARNING:** This pesticide is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow drift when bees are actively visiting the treatment area. Applications should be timed to provide the maximum possible interval between treatment and the next period of bee activity.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame. Flashpoint minimum of 105°F (41°C).

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

STORAGE: Store this product in its original container in a dry, cool, secured area out of reach of children. Do not contaminate water, foodstuffs, feed, or seed by storage or disposal.

PESTICIDE DISPOSAL: As a responsible environmental practice, where possible, it is recommended that all of the contents of the container be used, carefully following label directions and precautions. Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use, according to label instructions, they must be disposed of at, or by, an Approved Waste Disposal Facility, or contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA regional office for guidance.

IF EMPTY: Do not reuse this container. Place in trash or offer for recycling if available.

IF PARTLY FILLED: Call your local waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain. **SPILL:** In case of spill, absorb liquid with absorbent material such as soil or clay etc. Place absorbed spill in a labeled container and dispose of according to PESTICIDE DISPOSAL directions above. (E7-246)

CHEM-tox[™] PERMA-TOX INSECTICIDE

AN INSECTICIDE OFFERING SPACE CONTROL OF FLYING INSECTS.

RESIDUAL KILL OF CRAWLING INSECTS FOR UP TO 4 WEEKS.

INDOORS AND OUTDOORS - FOR TREATMENT OF SPORTING and MILITARY CLOTHING, UNIFORMS, GEAR, AND BED-NETS.

KEEP OUT OF REACH OF CHILDREN WARNING

STOP: Read Label Before Use

See side panels for additional Precautionary Statements.

ACTIVE INGREDIENT:

*Permethrin CAS[52645-53-1] - - - - - 13.30%

OTHER INGREDIENTS** - - - - - 86.70%

Total 100.00%

*Cis/trans isomers ratio: min. 55%(cis) and max. 45%(trans).

**Contains Petroleum Distillate

EPA REG. NO. 45385-69 EPA EST. NO. 56-0H-01

Net Contents: 2 ounces (60 ml) - 1 pint;
1 quart - 1 Gallon / (3.785 Liters)



MSN 6840-01-334-2666

Manufactured in the U.S.A. Military Specification MIL-I-44411(1)

DIRECTIONS FOR USE ON OUTER CLOTHING & BED NETS:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply to skin or to the inside surfaces of clothing. Keep away from food, eating utensils and water supplies. Thoroughly wash any items contaminated with this product. Wear chemical resistant gloves when mixing and using. Treated garments, uniform, netting and tentage provides protection to covered areas of body from bites of mosquitoes, ticks, chiggers, and human body lice.

APPLICATION PROCEDURE: To avoid inhalation and contact, applicator must wear a respirator and chemical resistant gloves. Thoroughly clean a 1 quart hand trigger sprayer by triple rinsing with clean water.

FOR CLOTHING: Place entire contents of this 2 ounce bottle into 1 quart of clean water in a 1 quart hand trigger sprayer. Apply only to the outside surfaces of outer clothing. Do not treat the inside surface. Place each article of clothing, (sporting, bath, dress, uniform, jacket and/or trousers) on the ground and spray mist only the outside of the clothing fabric for 3 to 6 seconds. Do not spray to wet the fabric. A light spray mist is all that is required. Hang the treated garment to thoroughly dry. When dry, it is ready to wear. Mark clothing with date of treatment. Do not treat clothing a second time, since treatment is effective for life of the garment. Do not treat underwear, headgear, or the inside surfaces of the outer clothing.

FOR BED NETTING: Spread netting on the ground and spray mist at a distance of 12 to 18 inches using the trigger spray mister. Spray with a slow sweeping motion to completely cover the netting fabric without runoff. Allow to thoroughly dry and aerate before use. (E7-31-05)

WARRANTY STATEMENT Our recommendation for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice. The buyer must assume all responsibility, including injury or damages, resulting from its misuse as such, or, in combination with other materials.

DIRECTIONS FOR USE (Continued)

FOR USE IN NON-FOOD AREAS INDOORS AND OUTSIDE PREMISES OF MOTELS, HOMES, PRESCHOOLS, DAY CAMPS, HOME GREENHOUSES, SEED STORAGE HOUSES, FOOD HANDLING ESTABLISHMENTS, PACKAGING AND PROCESSING PLANTS, COMMERCIAL INDUSTRIAL OFFICES, INSTITUTIONAL AND STORAGE BUILDINGS, DAIRIES, MILK STORAGE ROOMS, EGG PROCESSING PLANTS, SUPERMARKETS, RESTAURANTS, BOTTLING PLANTS, CANNERIES, FLOUR AND FEED MILLS, BAKERIES, AND HOSPITALS. IN HOSPITALS, PATIENTS SHOULD BE REMOVED PRIOR TO TREATMENT. ALSO FOR USE IN DOG KENNELS AND HORSE STABLES. IN HORSE STABLES; NOT FOR APPLICATION IF HORSES WILL BE USED FOR FOOD. Do not use in food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas where 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. Nonfood 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). One gallon of finished spray is sufficient to treat 1580 linear feet (482 m) with a 6 inch (1 5.2 cm) spray band. For contact and residual sprays, mix PERMA-TOX with water in the following manner:

FINISHED SPRAY	CHEM-TOX PERMA-TOX
0.25%	2-23 oz. or 78 ml in 1 Gal. or 3.78 L Water
0.5%	23 oz. or 70 ml in 1 Quart or 0.95 L Water
1.25%	5-1/2 oz. or 163 ml in 1 Gal. or 3.79 L Water
0.50%	1-1/3 oz. or 39 ml in 1 Quart or 0.95 L Water

INDOOR PEST CONTROL

RESIDUAL SPRAY and contact control of cockroaches (waterbugs), crickets, silverfish, (firebrats), clover mites, millipedes, centipedes, earwigs, sowbugs (pillbugs), spiders, brown dog ticks, lone star ticks, ants, fire ants, clothes moths, carpet beetles, fleas, boxelder bugs, scorpions, spider beetle, bed bugs, grasshoppers, house flies, mosquitoes, gnats, fruit flies, cluster flies, flying moths, confused flour beetles, saw-toothed grain beetles, shiny spider beetles, grain mites, red flour beetles, Angoumois grain moth, grain weevils, Indian meal moths, Mediterranean flour moths, lesser grain borers, cigarette beetles, drug store beetles, chocolate moths.

Spray thoroughly into hiding places such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas. Spray directly on insects where possible.

FOR BED BUGS: Apply as a spot treatment to cracks and crevices, around baseboards, floorboards, bedboards and walls. First thoroughly clean and air mattresses and springs. Then spot treat only areas that may harbor bedbugs, concentrating on tufts, folds and seams. Allow all treated articles to dry thoroughly before use.

GRAIN INSECTS: To control confused flour beetles, saw-toothed grain beetles, spider beetles, shiny spider beetles, grain mites, red flour beetles, Angoumois grain moth, grain weevil, Indian meal moth, Mediterranean flour moths, lesser grain borer, cigarette beetles, drug store beetles, chocolate moths, carpet beetles - remove infested grain, cereal or flour and destroy. Avoid contamination of other food and foodstuffs in the area by removing before spraying. Spray directly on exposed stages and into crack and crevices where grain insects may be hiding. In homes, dispose of all infested products. The shelves and drawers should be cleaned and thoroughly sprayed so as to contact all pests, and covered with stiff paper after allowing shelves to dry. Any utensils that are contacted with spray should be washed before using. Repeat as necessary.

SPIDERS: Spray directly on these pests and use repeated applications to the webbing and all cracks and crevices which harbor spiders.

ANTS (Including FIRE ANTS): To kill ants, spray trails, nests and points of entry within buildings and homes. Spray directly on ants where possible. Repeat as necessary.

WASPS, HORNETS, YELLOW JACKETS, BEES: Application should be made in the late evening when insects are at rest. Spray liberally into hiding and breeding places, especially under attic rafters, contacting as many insects as possible.

FLEAS, BROWN DOG TICKS and LONE STAR TICKS: On DOGS, CATS and PETS: Lightly spray mist animals along back under legs and other areas, except scrotum and anus. Part hair to contact skin and insure good coverage. Hold sprayer 2 feet (30 cm) away while spraying. Apply until hair is thoroughly moist. Do not spray directly in eyes mouth or nose on animals. To prevent reinestations, thoroughly spray the animal bedding and other resting areas until the surface is slightly moist contacting as many insects as possible. Treat the floor areas, cracks and crevices in the floor and along baseboards at the rate of 2 seconds per linear foot (30 cm) at a distance of 12 to 18 ft - (30-45 cm). Also spray the entire surface of dog houses.

INDOOR PEST CONTROL (Continued)

CARPET BEETLES AND CLOTHES MOTHS: To treat carpets - hold container 14 - 18 inches (36 - 46 cm) from carpet. Apply spray evenly, covering the entire surface until slightly moist. Spray underside of carpet when possible. Avoid wetting or soaking. To treat garments, blankets, carpets and other fabrics before storage: Dry clean or wash before and after storage. Apply spray evenly, covering the material on both sides until slightly moist. For best results, place treated materials in plastic bags after drying, and store in dark place. Also spray floor and baseboards, closets, cracks, crevices, infested areas of shelving or wherever these insects are seen or suspected.

SPACE SPRAY FOR HOUSE FLIES, MOSQUITOES, CLUSTER FLIES, GNATS, FRUIT FLIES and FLYING MOTHS: Close off all doors and windows. Cover or remove all food, food utensils, cover furniture or bedding. Point sprayer upward. Direct spray mist to all parts of the room especially windows and other light sources which may attract these insects. Fill the room with mist then leave the treated area. Keep the room closed for at least 15 minutes. Ventilate the area when treatment is completed.

OUTDOOR PEST CONTROL

PESTS ON OUTSIDE SURFACES OF BUILDINGS: Use this product to control ants, clover mites, crickets, earwigs, millipedes, and sowbugs (pillbugs) on outside surfaces of buildings. To help prevent infestation of buildings, seal the building foundation to a height of 2 to 3 ft (0.5 to 1 m), where pests are active and many find entrance. Also, apply as a residual spray to outside surfaces of buildings, including porches, screens, window frames, eaves, patios, garages, refuse dumps, and other areas where these pests congregate or have been seen. Repeat treatments as needed.

ANTS, LONE STAR TICKS, CRICKETS, FLEAS AND EARWIGS: For treatment of localized infestations of these insects in outdoor areas where there are weeds or brushy non-crop areas, spray infested areas thoroughly. For ants, thoroughly wet hills and runways. Repeat application as infestation warrants and as reinfestation occurs.

HORNETS, YELLOW JACKETS, BEES: Application should be made in late evening when insects are at rest. Aim spray at nest openings in ground, bushes, and in cracks and crevices which may harbor nests, saturating nest openings and contacting as many insects as possible.

TO CONTROL FIRE ANTS: Dilute 2 tablespoons (30 ml) of this product in 1 gal. (3.79 L) of water. Apply 1 gal (3.79 L) of solution as a gentle rain to each Fire Ant mound using a sprinkler can. Thoroughly wet the mound and surrounding area to a 4 foot diameter (1.22 m). For best results, apply in cool weather, 65-80°F (18-27°C), or in early morning or late evening hours. Treat new mounds as they appear. Do not disturb the mound prior to treatment. If possible, treat all mounds in the vicinity, and treat all colonies which may not as yet have constructed a mound. Larger quantities of solution can be prepared for multiple mound treatments. Equipment to deliver the diluted product as a gentle rain at the rate of 1 gal (3.79 L) per mound is still required. Do not use equipment that produces a pressurized spray as pressurized sprays may disturb Fire Ants and cause migration, reducing effectiveness.

SPACE SPRAY FOR HOUSE FLIES, MOSQUITOES, BITING FLIES, CLUSTER FLIES, GNATS, FLYING MOTHS: For outdoor use as an aid in reducing annoyance from these insects. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages, and other places where these insects alight or congregate. Repeat as necessary.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAY 16, 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
it is amended, for the pesticide
registered under EPA Reg. No.
45385-69

CTX CENOL INCORPORATED
P.O. BOX 472 - TWINSBURG, OH 44087

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