

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

SEP 17 2008

Timothy Dickens, Ph.D.  
Scientific Coordination, Inc.  
Coulston Products, Inc.  
4629 Cherry Valley Drive  
Rockville, MD 20853-0030

Subject: Label Amendment

EPA Reg. No. 50404-3  
CIC Residual Insecticide No.1  
Your Submission Dated June 19, 2008


Dear Dr. Dickens:

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. 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.

- o Delete the marketing claim "*Military style clothing treatment.*" This claim could imply heightened efficacy since there are a number of application methods to treat military clothing including commercial impregnation.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,

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

Enclosure



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## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. (Depending on container used in market either a trigger, pump or other type sprayer, with instructions, will be included with the product.) Do not transfer to another container. SHAKE WELL BEFORE USING.

## INDOOR APPLICATION

For spot application only. Do not use as a space spray indoors. For home residential use only. Avoid contamination of feed and foodstuffs. 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. Remove pets and birds, and cover fish aquaria before making surface applications. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

**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, 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.

To control bedbugs: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors.

To control fleas (adults and larvae) and ticks, including Ticks which may carry Lyme disease and Rocky Mountain Spotted Fever (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. 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 spray into cracks, joints and crevices. After airing, infested articles may be treated lightly, keeping sprayer nozzle at least 18 inches 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.

Read entire label before each use. Use only on dogs.

### ON DOGS

To control fleas, ticks (including Ticks which can infect dogs with Lyme disease) and lice: Start spraying at the tail, moving the dispenser rapidly and making sure that the animals 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 and face. Avoid contact with genitalia. Wear rubber gloves or mitts when applying this product. Repeat application every 5 weeks as necessary.

Do not use on puppies under twelve weeks. Consult a veterinarian before using this product on debilitated, medicated, aged, pregnant or nursing 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. For product questions and emergency information call 800-940-4464.

### FOR CONTROL OF HOME 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 home gardens and for spot treatments of incipient insect infestations to prevent spreading in larger home 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 army worms.

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.

**(FOR 0.5, 1 AND 1.5 GALLON SIZE ONLY)**

### OUTDOOR APPLICATION

TO CONTROL TICKS, INCLUDING TICKS WHICH MAY CARRY LYME DISEASE AND ROCKY MOUNTAIN SPOTTED FEVER (PERIMETER TREATMENT AROUND HOMES & CAMPSITES):

Use this product as a residual treatment to control Ticks including Deer Tick [(a.k.a. Black-legged Tick or Western Black-legged Tick)(*Ixodes scapularis*)], Lone Star Tick (*Amblyomma americanum*), Brown Dog Tick (*Rhipicephalus sanguineus*), American Dog Tick (*Dermacentor variabilis*), and Pacific Coast Tick (*Dermacentor occidentalis*). For each area listed below, apply until surface is wet (approximately 0.5 gal./375-500 ft<sup>2</sup> or 1 gal./750-1000 ft<sup>2</sup>).

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.

**(SEPARATE PACKAGING/LABELING ONLY)**

**ON CLOTHING**

To repel & kill mosquitoes, chiggers, mites and ticks, including Ticks which carry Lyme Disease and Rocky Mountain Spotted Fever.

**This product must not be applied to clothing while it is being worn. Under no circumstances should bare skin or clothing on the body be treated.**

Do not spray directly on or otherwise allow to come in contact with skin, face, or eyes. This product is to be used as a clothing treatment only. In case of accidental spraying of skin, face or eyes, see "First Aid" on side panel. Make all applications outdoors.

[Pump and Spray Packaging Directions:] [Activate pump 5 to 10 times to spray. Completely remove pump top, use just enough repellent to cover clothing, recharging pump as needed.]



For six week protection against ticks, chiggers, mites and mosquitoes select an outdoor area protected from the wind, spray outer surfaces of clothing (while not being worn) with a slow sweeping motion to lightly moisten the surface of the fabric, holding pump at a distance of 6 to 8 inches. (A complete outfit consists of shirt, trousers, and socks.) Treat outer surfaces of each outfit, front and back, for 30 seconds on each side and allow to dry for at least 2 hours (4 hours under humid conditions). Pay particular attention to socks, trouser cuffs, and shirt cuffs.

[Directions for use "Option" to complement clothing treatment package size.]

e.g. 6 oz. net package: One pump bottle will treat one complete outfit.

e.g. 12 oz. net package: One pump bottle will treat two complete outfits. Use 1/2 of bottle for each complete outfit.

e.g. 24 oz. net package: One pump bottle will treat four complete outfits. Use 1/4 of bottle for each complete outfit.

Do not exceed recommended spraying times. Clothing should be retreated after six weeks or after the sixth laundering to maintain adequate protection. In heavily infested areas, protection from ticks will be improved by either wearing the cuffs inside footwear or taping pant cuffs around legs. Protection from mosquitoes can be further enhanced by applying an EPA approved repellent to face, hands and other exposed areas of the body.

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GEAR: MOSQUITO NETTING, NETS, TENTS, CANOPIES, SCREEN ENCLOSURES, SLEEPING BAGS, BACKPACKS AND GROUND CLOTHS: Do not treat inside of sleeping bag. Spray exterior surfaces of tent only. Select a well-ventilated outdoor area protected from wind and lay out [or hang] gear [article] to be treated. Hold pump [container] upright about 6 to 8 inches from surface of the article and spray [with a slow sweeping motion] to lightly moisten the surface of the fabric. Continue spraying over entire article, until the outer surfaces of the article are moist enough to cause a light color change [or darkening]. Hang treated gear [article] and allow to dry for at least 2 hours (4 hours under humid conditions) before using. Do not retreat gear more than once every six weeks.

(ALTERNATE APPLICATION PROCEDURE FOR CLOTHING USING RESEALABLE BAG)

#### OPTION 1: 6 OZ. /3 ARTICLES

To repel & kill mosquitoes, chiggers, mites and ticks, including Ticks which carry Lyme disease and Rocky Mountain Spotted Fever.

**This product must not be applied to clothing while it is being worn. Under no circumstances should bare skin or clothing on the body be treated.**

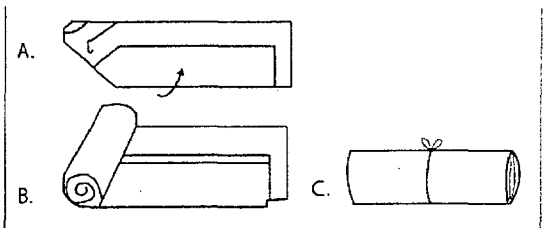
To be used for treatment of clothing and bed nets only. Make all applications outdoors. In case of accidental contact of skin, face or eyes, see "First Aid" on side panel. DO NOT TREAT UNDERWEAR, HATS, CAPS OR INNER CLOTHING.

**Components:** [zip lock] [zipper] [resealable] treatment bag, 6 oz. bottle of Permethrin solution, waterproof gloves, string

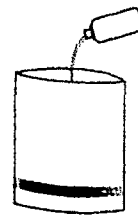
**SHAKE WELL BEFORE USING: Application Procedure:** One kit will adequately treat 1 adult shirt, 1 adult trousers and 1 bed net. Pour the entire contents of the bottle into the [zip lock] [zipper] [resealable] treatment bag provided with the kit. Fill bottle (twice) with water and pour into bag. [For bulkier garments (denim jeans, heavy cotton shirts, etc.) fill bottle three times with water.] Lay garments [articles] (shirt, trousers and bed net) flat and on top of each other. Roll firmly [tightly] and tie with string provided. Place rolled up and tied garments [articles] (shirt, trousers and bed net) into the bag and seal the [zip lock] [zipper] [resealable] closure. Shake bag to provide uniform coverage of garments [items]. Let stand 2 hours or more. Wearing the waterproof gloves provided with kit, [unzip] [open] bag, remove garments [items], untie and hang outdoors until dry (approximately 2-3 hours). When dry, garments are ready to wear [items are ready for use]. Follow standard laundering procedures. Clothing should be retreated after six weeks or after the sixth laundering to maintain adequate protection. Launder clothing at least once before retreating. [Do not dry clean.]

For further protection, use in conjunction with an insect repellent registered for direct application to the skin and utilize the following primary preventive measures. Avoid areas where pests are found, wear appropriate clothing (light-colored, long sleeved shirt and long pants tucked into socks) and inspect body daily for ticks. Pant cuffs should be worn inside socks or footwear to ensure full protection against ticks and chiggers.

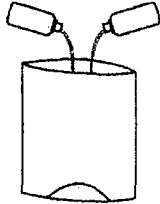
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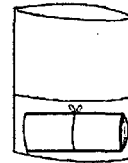
1. Lay articles (shirt, trousers or bed net) flat, fold (A) and roll tightly (B). Tie middle of roll tightly with string (C).



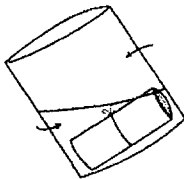
2. Pour the entire contents of the bottle into the bag.



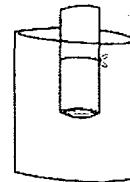
3. Fill the bottle (twice) with water and pour into the bag.



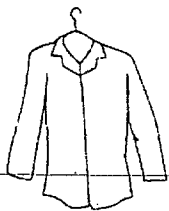
4. Place rolled items into the bag and seal the closure.



5. Shake bag to provide uniform coverage of items. Let stand 2 hours or more.



6. Wearing the waterproof gloves, open bag and remove articles.



7. Untie string and hang articles outdoors until dry (2-3 hours). When dry, items are ready to wear/use.



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

**OPTION 2: 3 OZ. /SINGLE ARTICLE**

To repel & kill mosquitoes, chiggers, mites and ticks, including Ticks which carry Lyme disease and Rocky Mountain Spotted Fever.

**This product must not be applied to clothing while it is being worn. Under no circumstances should bare skin or clothing on the body be treated.**

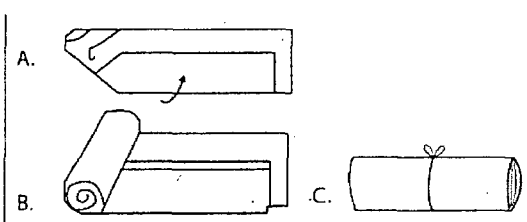
To be used for treatment of clothing or bed net only. Make all applications outdoors. In case of accidental contact of skin, face or eyes, see "First Aid" on side panel. **DO NOT TREAT UNDERWEAR, HATS, CAPS OR INNER CLOTHING.**

**Components:** [zip lock] [zipper] [resealable] treatment bag, 3 oz. bottle of Permethrin solution, waterproof gloves, string

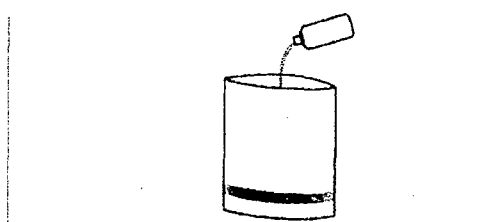
**SHAKE WELL BEFORE USING: Application Procedure:** One kit will adequately treat one of the following: 1 adult shirt, 1 adult trousers or 1 bed net. Pour the entire contents of the bottle into the [zip

lock] [zipper] [resealable] treatment bag provided with the kit. Fill bottle (twice) with water and pour into bag. [For bulkier garments [items] (denim jeans, heavy cotton shirts, etc.) fill bottle three times with water.] Lay garment [item] flat. Roll firmly [tightly] and tie with string provided. Place rolled up and tied garment [item] into the bag and seal the [zip lock] [zipper] [resealable] closure. Shake bag to provide uniform coverage of garment [article]. Let stand 2 hours or more. Wearing the waterproof gloves provided with kit, [unzip] [open] bag, remove garment [item], untie and hang outdoors until dry (approximately 2-3 hours). When dry, garment [item] is ready for use. Follow standard laundering procedures. Clothing should be retreated after six weeks or after the sixth laundering to maintain adequate protection. Launder clothing at least once before retreating. [Do not dry clean.]

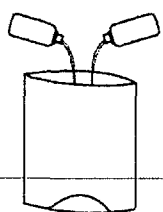
For further protection, use in conjunction with an insect repellent registered for direct application to the skin and utilize the following primary preventive measures. Avoid areas where pests are found, wear appropriate clothing (light-colored, long sleeved shirt and long pants tucked into socks) and inspect body daily for ticks. Pant cuffs should be worn inside socks or footwear to ensure full protection against ticks and chiggers.



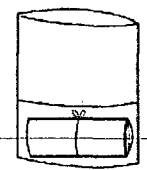
1. Lay article (shirt, trousers or bed net) flat, fold (A) and roll tightly (B). Tie middle of roll tightly with string (C).



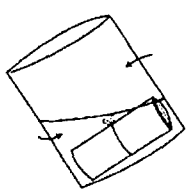
2. Pour the entire contents of the bottle into the bag.



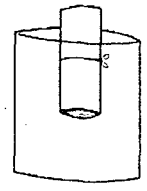
3. Fill the bottle (twice) with water and pour into the bag.



4. Place rolled item into the bag and seal the closure.



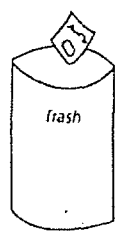
5. Shake bag to provide uniform coverage of item. Let stand 2 hours or more.



6. Wearing the waterproof gloves, open bag and remove article.



7. Untie string and hang article outdoors until dry (2-3 hours). When dry, item is ready to wear/use.



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



## STORAGE AND DISPOSAL

**Storage:** Store in a cool, dry place inaccessible to children.

**If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency [or toll free number or website] for disposal instructions. Never place unused product down any indoor or outdoor drain.

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Avoid contact with face, eyes, or skin. Avoid breathing vapors or spray mist. Harmful if swallowed. Wash thoroughly after handling and before eating or smoking. Do not use on humans.

## FIRST AID

If Swallowed	<ul style="list-style-type: none"> <li>* Call a poison control center or doctor immediately for treatment advice.</li> <li>* Have person sip a glass of water if able to swallow.</li> <li>* Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>* Do not give anything by mouth to an unconscious person.</li> </ul>
If Inhaled	<ul style="list-style-type: none"> <li>* Move person to fresh air.</li> <li>* If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>* Call a poison control center or doctor for treatment advice.</li> </ul>
If On Skin	<ul style="list-style-type: none"> <li>* Take off contaminated clothing.</li> <li>* Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>* Call a poison control center or doctor for treatment advice.</li> </ul>
If In Eyes	<ul style="list-style-type: none"> <li>* Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>* Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>* Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have product container with you when calling for help or going for treatment. [Questions?: 800-940-4464, Weekdays from 9-5 EST.]</p>	

NOTE: The First Aid statement's grid format will be used if market label space permits; otherwise a paragraph format will be used.

## ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

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

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Manufactured and Marketed By:  
Coulston Products Incorporated  
605 Seventh Ave. North  
P.O. Box 188  
Safety Harbor, FL 34695 USA

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EPA Reg. No. 50404-3      EPA Est. No. 58188-FL-1

Nomex® is a registered trademark of E.I. DuPont de Nemours and Co., Inc., Wilmington, Delaware.

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~ OPTIONAL MARKETING LANGUAGE, SYMBOLS & GRAPHICS ~

A Ready-To-Use DURANON® 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

**(FOR 0.5, 1 AND 1.5 GALLON SIZES ONLY)**

For Control of Ticks which may cause Lyme disease and Rocky Mountain Spotted Fever around Homes & Campsites

**(CLOTHING AND GEAR TREATMENT: SEPARATE PACKAGING/LABELING ONLY)**

Clothing [and Gear]

Pump-n-Spray

Easy Application Trigger Sprayer

Treatment for FR (flame resistant) and other clothing

Will (Does) not affect the protection properties of FR clothing and NOMEX® protective apparel

Will (Does) not leave flammable residue on clothing

Repels & Kills Ticks, Chiggers, Mites and Mosquitoes

Repels and Kills Ticks which may carry Lyme Disease and Rocky Mountain Spotted Fever

Soak for 2 Hours

Effective for 6 (six) Weeks

Effective through six (6) washings

Odorless Permethrin

Non-Aerosol Pump

Clothing [and Gear] Treatment Only

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A Treatment for Clothing [and Gear] [and Mosquito Netting, Nets, Tents, Canopies, Screen Enclosures, Sleeping Bags, Backpacks and Groundcloths]

Treatment for Clothing [and Gear] [and Mosquito Netting, Nets, Tents, Canopies, Screen Enclosures, Sleeping Bags, Backpacks and Groundcloths]

Insect Repellent Protective Treatment for Clothing [and Gear] Application

Military style clothing treatment

Clothing [and Gear] Treatment

DO NOT APPLY TO SKIN

The following graphics and/or symbols have been added:

