

Mr. Joe Blake
Control Solutions, Inc.
5903 Genoa Red Bluff
Pasadena, Texas 77507-1041

JUL 21 2005

Dear Mr. Blake: ~

Subject: Label Amendment- add Vegetables and Termite Uses
Permethrin 2.5% EW RTS
EPA Registration Number 53883-134
Your submissions dated May 11 and June 2, 2005

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.

2. Make the following label changes:

a) Add the specific directions for control of carpenter ants and bees on page 4 that appears on the labeling for Permethrin 2.5EW (Registration Number 53883-79).

3. Submit three (3) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

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

Enclosure

2/10

Permethrin 2.5 EW RTS

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUL 21 2005

For Use Around Residential (Home) Areas Only
(editors note: [] brackets indicate alternate/optional text)

- Up to 4 Week Control
- [• Kills [Controls] Mosquitoes, Fleas, Ticks and Ants]
- Water Based
- [• [Also] Kills Japanese Beetles, [Mosquitoes], [Fire Ants] and many other insects]
- Kills and Repels
- Kills [Deer] Ticks that [which] may carry Lyme Disease
- [Also] Stop[s] Bugs in Your [Also Use on] • Lawns • [Trees & Shrubs] [• Roses & Flowers]
- Spray Around Yard Perimeter
- 32 oz. Treats Up to 5,000 Square Feet
- Hose End Use - Always Shake Well Before Using

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 53823-134

[Contains Permethrin, a long lasting insecticide which provides contact and residual control for up to 4 weeks of many hard-to-kill sucking and chewing insects.]

[PRODUCT USAGE [FACTS]

KILLS: [Ants,] Aphids, Beetles, [Chinch Bugs, Crickets, Japanese Beetles,] [Cutworms,] [Earwigs,] [Fleas,] [Japanese Beetle Grubs,] Mealybugs, [Mites,] [Mole Crickets,] [Mosquitoes,] [Sod Webworms,] Spider Mites, [Tent Caterpillars,] [Ticks,] Whiteflies and many other[s] [garden [nuisance] pests] [more insects] as listed.

USE ON [WHERE TO USE]: Roses, Flowers, Lawns, Trees and Shrubs, [Flowers] [and as a residual spray to outside surfaces of buildings, foundations, porches, patios, window frames, and other areas where pests congregate.] [Outdoors around the home]

AMOUNT TO USE: See detailed instructions inside label.]

[PRODUCT FACTS

- KILLS • Lawn Pests: Chinch bugs, Cutworms, Mole Crickets, Japanese Beetle Grubs & Sod Webworms
- Tree, Shrub & Flower pests: Aphids, Beetles, Tent caterpillars, Mealybugs, Mites, Whiteflies & other garden pests
 - Nuisance Pests (outdoors): Ants, Earwigs, Fleas, Mosquitoes and other nuisance pests
- WHERE TO USE • On Roses, Flowers, Trees, Shrubs & Lawns
- Outdoors around the home]

(Optional text below in *italics* used when packaged in a hose-end applicator container only.)

PRODUCT USAGE

KILLS: Ants, Chinch Bugs, Crickets, Japanese Beetles, Mosquitoes, Ticks, Whiteflies, and many other insects as listed.

USE ON: Lawns, Trees, Shrubs, Roses, Flowers, and as a residual spray to outside surfaces of buildings, porches, patios, window frames, and other areas where pests congregate.

AMOUNT TO USE: No mixing required. Connect to hose and spray.

ACTIVE INGREDIENT:

Permethrin*	2.5%
INERT INGREDIENTS:	97.5%
Total	100.0%

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

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Side/Back Label Panel for Additional Precautionary Statements

NET CONTENTS:

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

Environmental Hazards

This pesticide is extremely toxic to fish. Do not apply directly to water. Drifts and runoff from treated areas may be hazardous to aquatic organisms in treated areas. Do not contaminate water when disposing of equipment washwaters. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry area away from heat or open flame.

DISPOSAL: 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 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE

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

This product kills troublesome outdoor insects which destroy lawns, roses, flowers, trees and shrubs: Ants, Bagworms, Aphids, Borers, Armyworms, Chinch Bugs, Inchworms, Spider mites, Green fruitworms, Beetles, Fleas, Cicadas, Thrips, Leafhoppers, Cutworms, Sod webworms, Leafrollers, Whiteflies, Moths, Weevils.

Also kills Alfalfa loopers, Brown dog ticks, Budworms, Cabbageworms, Citrus black flies, Cluster flies, Codling moths, Corn earworms, Crickets, Earwigs, Elm spanworms, Fall cankerworms, Gnats, Grasshoppers, House flies, Japanese beetles, Leafminers, Lone star ticks, Lygus bugs, Mealybugs, Millipedes, Mole crickets, Mosquitoes, Navy orangeworms, Scales, Sowbugs (pillbugs), Spring cankerworms, Tent caterpillars, Ticks including Deer tick (which may carry Lyme disease) Tobacco budworms and many others.

NUISANCE PESTS IN OUTDOOR AREAS

Use rate: 6-2/3 fl. oz. in 1 quart of water, treating 400 linear feet with a 6 inch spray band [this use rate to be noted on labeling if product not packaged in Hose-End applicator.]

TREATMENT AREAS	PESTS [Controlled]	REMARKS [How to Use][General Directions]
Outside surfaces of buildings	Ants (including foraging fire ants), Chiggers, Clover mites, Crickets, Earwigs, Millipedes, Sowbugs (pillbugs), Mosquitoes	To help prevent infestation of buildings, treat the building foundation to a height of 2 to 3 feet, where pests are active and may find entrance. Also, apply as a residual spray to outside surfaces of building, including porches, screens, window frames, eaves, patios, garages, refuse dumps and other areas where these pests congregate or have been seen. Repeat treatment as needed to maintain effectiveness.
Other outdoor areas	Ants (including foraging fire ants), Chiggers, Crickets, Earwigs, Fleas, Lone star ticks, Ticks, including Deer tick (which may carry Lyme disease)	For treatment of localized infestations of these insects in areas where there are weeds or bushy non-crop areas, spray infested areas thoroughly. For Ants , thoroughly wet hills and runways. Repeat application as reinfestation occurs.
	Cluster flies, Flying moths, Gnats, House Flies, Mosquitoes	For use only 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.
	Tent caterpillars	Application should be made when caterpillars are young and tents are first noticed. For best results, apply in the late afternoon or evening, when caterpillars have returned to their tents. Wet tents with spray on all sides. A few caterpillars may be seen escaping from the tent, however, they should die within several hours.

Do not spray animals. People and pets should not be allowed in treated areas until spray has dried.

[The following use directions for wood-infesting insects (including termites*) may be used on product labeling for product not packaged in hose-end applicator.]

WOOD-INFESTING INSECTS (including termites*): For Beetles (Furniture, Deathwatch, False powderpost, Longhorned, Powderpost), Carpenter Ants (and other wood-infesting ants), Carpenter bees and Termites (including dry-wood termites):

Treat outside surfaces of buildings, porches, wooden decks and patios, wooden fences, window frames, doorways, foundations, eaves, patios, garages, garbage areas and other areas where you may find these pests.

Mix 5 fl. ozs. with 1/2 gallon of water to treat 50 sq. ft. Spray infested surfaces until thoroughly wet, avoiding dripping and runoff. Apply evenly on wood surfaces. To treat small areas, apply by brushing or spraying the diluted spray. For large areas, use a coarse, low pressure spray. Do not spray into electrical outlets or utilities.

Spray infested areas and areas likely to be infested, such as wood surfaces, voids and channels in damaged wood, spaces between wooden parts of a structure, and between wood and foundations where infestation is likely to occur, also around fenceposts, wood piles (do not use on firewood) and tree stumps.

Suitable protective clothing should be worn in confined or overhead areas to prevent exposure to eyes and skin. The use of eye protection, protective head covering, chemical resistant gloves and footwear, a long-sleeved shirt and long pants or coveralls are recommended. Do not permit contact with treated surfaces until spray has dried. Treated confined areas, such as detached garages, under porches and decks, should be ventilated during and immediately following application before the areas are re-occupied.

For Termites* [including dry-wood termites]: treat as for other wood-infesting insects. This product will kill workers and winged reproductive forms of termites in the treated areas.

*The purpose of such applications of this product for termites is to kill workers or winged reproductive forms which may be present in treated channels at the time of treatment. Such applications are not a substitute for mechanical alteration, soil treatment, or foundation treatment but are merely a supplement. This product is not recommended as sole protection against termites. For active indoor termite infestations, get a professional inspection.

HOME LAWNS

THREE EASY STEPS TO MIX AND APPLY:

Step #1: For lawns measure the area to be sprayed. Calculate square feet by multiplying length by width. For all other applications, apply as a thorough cover spray.

Step #2: Use a clean sprayer. Carefully measure and mix the amount of concentrate and water as directed.

Step #3: Spray as directed. Thorough coverage is important. Flush sprayer with clean water after each use. **Make applications when insects first appear.** Repeat applications as directed. See directions for complete insect list.

Use dilution rate as indicated.

1 fl. oz. = 6 tsp. or 2 tbsp;

8 fl. oz. = ½ pint or 1 cup.

Food utensils such as teaspoons or measuring cups should not be used for food purposes after use with insecticides.

TREATMENT AREAS [Plants]	PESTS [Controlled]	REMARKS [How to Use] [General Directions]
Bent, Bermuda, Bluegrass, Dichondra, Fescue, Irish Moss, Merion, St. Augustine	Armyworms, Brown dog ticks, Chiggers, Chinch bugs, Cutworms, Fleas, Japanese beetle grubs, Mole crickets, Mosquitoes, Sod webworms, Ticks, including Deer Tick (which may carry Lyme disease)	Use 6 fl. oz. in 10 gallons of water to cover 1,000 sq. ft. [this use rate to be noted on labeling if product not packaged in Hose-End applicator.] Thoroughly wet down grass a few hours before applying. Home lawns should be no taller than 3 inches at time of application. For heavy infestations, repeat application after 2 weeks.
	Ants (including foraging fire ants), Crickets, Grasshoppers	Use 2 fl. oz. in 10 gallons of water to cover 1,000 sq. ft. [this use rate to be noted on labeling if product not packaged in Hose-End applicator.]

TREES & SHRUBS

TREATMENT AREAS [Plants]	PESTS [Controlled]	REMARKS [How to Use] [General Directions]
Arizona cypress, Azalea, Birch, Cherry, Non-bearing citrus, Conifers, Elm, English ivy, Euonymus, Weeping fig, Fir, Honeysuckle, Lilac, Mock-orange, Oak, Palm, Philodendron, Pine, Poinsettia, Tulip, Poplar, Rhododendron, Taxus	Aphids, Bagworms, Cicadas, Exposed thrips, Fall cankerworms, Inchworms, Leafminers, Leafrollers, Mealybugs, Spider mites, Whiteflies	Use 1 oz. in 1 gallon of water. [this use rate to be noted on labeling if product not packaged in Hose-End applicator.] Apply as a thorough spray, wetting leaves and branches to the dripping point. Try to penetrate dense foliage. Spray in the late afternoon or evening, when the temperature ranges from 50° to 75° F and when there is little or no wind. Spray at the first sign of insects. Repeat as necessary; use intervals of 4-8 days. Application can be made up to the day of collection.
Cherry, Honeysuckle	Fall webworms	
Conifers	Budworms	
Elm	Elm leaf beetles, Elm spanworms, Fall webworms	
Douglas and Grand firs	Tussock moths	
Non-bearing citrus	Citrus black flies	
Oak	Oakworms	
Pine	Pine beetles, Pine moths, Pine needleminers, Needle scales	

ROSES & FLOWERS

TREATMENT AREAS [Plants]	PESTS [Controlled]	REMARKS [How to Use] [General Directions]
Ageratum, Aster, Azalea, Begonia, Coleus, Common ninebark and snowberry, Exacum, Gladiolus, Gold bells, Hypoestes, Ivy, Lilac, Marigold, Mock-orange, Nannyberry, Orchid, Pansy, Pea shrub, Petunia, Poinsettia, Rhododendron, Rose, Snapdragon, Zinnia	Aphids, Bagworms, Cicadas, Exposed thrips, Fall cankerworms, Fall webworms, Inchworms, Leafminers, Leafrollers, Mealybugs, Spider mites, Whiteflies	Use 1 oz. in 1 gallon of water. [this use rate to be noted on labeling if product not packaged in Hose-End applicator.] Apply as a thorough spray, wetting the plants to the dripping point. Try to hit underside of leaves and penetrate dense foliage. Spray in the later afternoon or evening, when the temperature ranges from 50° to 75° F and when there is little or no wind. Spray at the first sign of insects. Repeat as necessary; use intervals of 4-8 days. Application can be made up to the day of collection.

VEGETABLES

TREATMENT AREAS [Vegetables]	PESTS [Controlled]	REMARKS [How to use] [General Directions]	RATES [these use rates to be noted on labeling if product not packaged in Hose-End applicator.]
Asparagus (pre-harvest)	Asparagus beetles, Cutworms	Apply as needed to ensure uniform coverage. Do not make more than 4 applications per crop. Can be applied up to 3 days prior to harvest.	1 ½ fl. oz. in 1 gallon of water to cover 1000 sq. ft.
Asparagus (post-harvest)	Larval stages of asparagus beetle, Tarnished plant bug, Lygus bugs and Adult Japanese beetle	Treat ferns or bush growth after spear harvest when insects are present.	
Celery-See Leafy Vegetables			
Cole Crops, Broccoli, Brussels Sprouts, Cabbage, Cauliflower	Beet armyworms, Cabbage Aphids and Loopers, Diamondback Moths, Imported Cabbage worms	Apply every 5 days or as needed. Can be applied up to 1 day prior to harvest. Do not make more than 8 applications on Cauliflower, Brussels Sprouts and Broccoli and 10 applications on Cabbage.	1 fl. oz. in 1 gallon of water to cover 1000 sq. ft.
Corn-See Sweet Corn			
<u>Cucurbitis:</u> Balsam pear (bitter melon), Chinese waxgourd (Chinese preserving melon), citron melon, cucumber, gerkin, edible gourds: melons, including hybrids such as Cantaloupe, Casaba, Crenshaw, Honeydew, Honey Balls, Mango melon, Muskmelon, Persian melon, Pumpkin, Summer & Winter Squash, Watermelon	Aphids, Cabbage looper, Cucumber beetle (adults), Cutworms, Leafhoppers, Leafminers, Melonworms, Pickleworm, Plant bugs, Squash bugs	Apply as needed to ensure uniform coverage. Can be applied up to the day of harvest.	3 fl. oz. in 1 gallon of water to cover 1000 sq. ft.
Eggplant	Colorado potato beetles, Vegetable leafminers	Apply as needed to ensure uniform coverage. Do not exceed 16 applications. Can be applied up to 3 days prior to harvest.	

Horseradish (Foliar application)	Imported crucifer weevils	Apply as needed. Do not exceed 3 foliar applications. Can be applied up to 22 days prior to harvest.	
<u>Leafy Vegetables:</u> Amaranth, Arrugula, Celery, Celtuce, Chervil, Corn salad, Chrysanthemum (edible leaved and garland), cress (garden and upland), Dandelion, Dock, Endive, Fennel, Lettuce (head and leaf), Okra, Parsley, Purslane (garden and winter), Rhubarb, Spinach, Swiss chard	Alfalfa looper, Aphids, Beet armyworm, Cabbage looper, Corn earworm, Cutworms, European corn borer, Fall armyworm, Green cloverworm, Southern armyworm, Tobacco budworm, Vegetable leaf miner	Apply every 5 to 10 days as needed. Do not make more than 7 applications per crop. Can be applied up to 1 day prior to harvest.	2 fl. oz. in 1 gallon of water to cover 1000 sq. ft.
Melons-See Cucurbitis			
Potatoes	Beet armyworm, Colorado potato beetle, Potato leafhopper, Potato tuberworm, Cabbage looper, Cutworms, European corn borer, Potato psyllid, Tarnish plant bug	Apply as needed. Do not make more than 12 applications. Can be applied up to 7 days prior to harvest.	1 ½ fl. oz. in 1 gallon of water to cover 1000 sq. ft.
Peppers	Vegetable leafminers, Cabbage looper, Flea beetle, Corn earworm, Pepper weevil, European corn borer	Apply as needed, but not more than 8 applications per season. Can be applied up to 3 days prior to harvest.	2 fl. oz. in 1 gallon of water to cover 1000 sq. ft.
Sweet Corn	Corn earworm, European corn borer, Fall armyworm, Southern armyworm	Apply every 5 days and when needed, but not more than 6 applications per season. Can be applied up to 1 day prior to harvest.	1 ½ fl. oz. in 1 gallon of water to cover 1000 sq. ft.
Tomatoes	Beet and southern armyworm, Tomato pinworm, Tomato fruitworm, Horn worms, Granulate cutworms, Colorado potato beetle, Cabbage looper	Apply as needed for uniform coverage. Can be applied up to day of harvest.	

HOSE END SPRAYER: Easy to Use. For Application to Lawns, Outdoor Ornamentals, Outside Surfaces of Buildings, and Other Outdoor Residential Areas. 32 oz. Treats Up to 5,000 Square Feet

1. Make sure Knob is twisted fully clockwise to OFF position. Shake well before attaching to hose.
2. Turn Product Control Button clockwise until the flat portion is flush with the lock tab, then push button all the way in. Avoid squeezing bottle.
3. Turn water on at faucet, aim nozzle toward lawn and turn knob counterclockwise to begin spraying.
4. When finished push Product Control Button to OFF position from opposite side. Return knob and faucet to OFF position. Discharge water pressure by turning knob ON and OFF again. Turn Product Control Button counterclockwise away from lock tab to prevent accidental discharge. Store out of reach of children.

(Alternate Hose End Sprayer Directions – Used in accordance with type of Hose End packaged)
HOSE END SPRAYER: Easy to Use. For Application to Lawns, Outdoor Ornamentals, Outside Surfaces of Buildings, and Other Outdoor Residential Areas.
 32 oz. Treats Up to 5,000 Square Feet.

1. Make sure knob control lever is in the **OFF** position. Shake well and attach to hose.
2. Turn water on at faucet, aim nozzle toward lawn and turn knob control lever to **ON** to begin spraying.
3. When finished turn control lever to **OFF** position. Turn faucet to **OFF** Position. Discharge residual water pressure by turning **ON** and **OFF** again. Store out of reach of children.

(Alternate Hose End Sprayer Directions – Use in accordance with type of Hose End packaged)
HOSE END SPRAYER: Easy to Use. For Application to Lawns, Outdoor Ornamentals, Outside Surfaces of Buildings, and Other Outdoor Residential Areas.
 32 oz. Treats Up to 5,000 Square Feet

INSTRUCTIONS

1. Make sure [white] Water [Control] Valve [on top of bottle] is in the OFF or back position and the red Product Mixing Valve is [pointed] in the CLOSED or upright position.
2. Shake the product well and firmly attach to garden hose.
3. Turn water on at faucet and aim nozzle toward lawn. To begin water flow, turn [white] Water Valve ON by pushing forward. To begin spraying mixture, rotate [red] Product Mixing Valve OPEN by turning it ¼ of a turn counter clockwise.
4. Walk at a steady pace spraying in a side to side arc slightly overlapping treated areas. [Refer to graduated side of container to guide coverage.]
5. To stop spraying, turn the [red] Product Mixing Valve to the CLOSED or upright position and return the [white] Water Valve to the OFF or back position.
6. For product storage, both valves should be in the CLOSED/OFF position.

(Editors Note: The following two sets of alternate hose end sprayer directions are for specific customer packaging and used only by that customer on their final printed labels.)

(Alternate Hose End Sprayer Directions – Use in accordance with type of Hose End packaged)
[FOR USE WITH THE Lock 'N Spray® SYSTEM
 Lock 'N Spray makes lawn and garden care easy. Simply attach this cartridge to the Lock 'N Spray sprayer (sold separately). Eliminates mixing, measuring and messy clean up. Automatically mixes the right amount of product and water.]

HOW TO USE THE Lock 'N Spray® SYSTEM	
CONNECT	Connect sprayer to hose.
	Attach cartridge to sprayer. Turn cartridge until it clicks into place.
SPRAY	To begin spraying, rotate sprayer nozzle tip to direct spray up or down, or remove for a 20 to 25 ft. jet spray. Turn on water and squeeze trigger.

FINISH	• To stop spraying, release trigger, unlock cartridge and remove from sprayer. (No need to turn off water.)
	• To clean sprayer, flush with water, squeezing and releasing trigger in 2 short bursts. Turn off water.
	• To disconnect sprayer, relieve water pressure by squeezing trigger.
Cartridge reseals itself automatically – No spills, no leaks!	

(Alternate Hose End Sprayer Directions – Use in accordance with type of Hose End packaged)

HOW TO USE THE Ready-Spray® SYSTEM

CONNECT:

1. Shake well before using.
2. Connect sprayer to hose. Be sure larger green ON/OFF switch located at hose end is set to "OFF"
3. Turn on water.
4. Activate smaller green switch at sprayer opening to "OPEN" position. (Coin or key may be needed to activate switch.)

SPRAY:

1. To begin spraying, point nozzle in the direction you want to spray.
2. Turn larger green ON/OFF switch at hose end counterclockwise to on position.
3. Spray evenly over measured area.

FINISH:

1. To stop spraying, turn larger green ON/OFF switch clockwise to "OFF".
2. Deactivate smaller green switch at sprayer opening to "CLOSED" position.
3. Turn off water.
4. Relieve water pressure by turning larger green ON/OFF switch counterclockwise to on position until water slows to a drip. Then, turn same ON/OFF switch back to "OFF".
5. Disconnect sprayer from hose.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Control Solutions, Inc.
 5903 Genoa-Red Bluff
 Pasadena, TX 77507-1041
 EPA Reg. No. 53883 – 134
 EPA Est. No. 53883-TX-002