

5-6783-1

4/25/1996

1/5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

3415539502
3495504350
2/9

25 APR 1996

Mr. Alexander Kovel
EcoHealth, Inc.
33 Mt. Vernon St.
Boston, MA 02108

Dear Mr. Kovel:

Subject: Labeling on Existing Stocks and Updated Labeling
Damminix
EPA Registration No. 56783-1
Your Submissions Dated March 15, March 22, 1996

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the labeling changes listed below before your release the product for shipment bearing the amended labeling:

1. On the tubelabel replace the "Keep Out of Reach of Children" with "Do not allow Children or Pets to Handle or Play with this Product." Note that this change is for the tube label only. This was also brought to your attention in previous correspondence.
2. A review of our files does not indicate approval (stamped label) of the paragraph beginning How Damminix Tick Tubes Kill Ticks... Therefore we agree with New York State that this passage must be deleted or overstickered until we have had the opportunity to review this language against the data submitted. We will notify you when review is complete but it may take several months.

With respect to your request for an extension of time to use existing labeling we agree to allow the marketing of the old box and tube labels (without stickers) submitted September 1, 1992 through August 31, 1996. It is understood that this permission is for 500 boxes of 24 tubes and 160 boxes of 96 tubes for shipment to Fire Island only. It is understood that all product packaged and shipped after August 31, 1996 will carry the labeling submitted with the subject letter plus above comments.

CONCURRENCES							
SYMBOL							
SURNAME	<i>Kovel</i>						
DATE							

2/5

2

Submit three copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

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

DAMMINIX®
A TICK TOXICANT

Tick
Tube

ACTIVE INGREDIENT:	Permethrin, 7.4%
INERT INGREDIENTS:	92.6%
Total	100.0%

+ (S)-hexa-(phenyl) methyl (+/-) cis/trans 3-(2,2-dichloroethoxy) 2,2-dimethylpropane carboxylate.
* Cis/trans ratio: Min. 95% (+/-) cis and max. 65% (+/-) trans.

CAUTION: KEEP OUT OF REACH OF CHILDREN

See outer carton for complete directions and precautions.

Net Contents: 4.5 grams

EPA Reg. (No. 56783-1) EPA Est. No. 5693 MA 1 U.S. Patent (No. 4,662,104)

ECOHEALTH, INC. BOSTON, MA 02106-2147

ACCEPTED
with COMMENTS
in EPA Letter Dated

25 APR 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
56783-1

DAMMINIX[®]
A TICK TOXICANT

USE AS AN AID
IN THE CONTROL
OF LYME DISEASE
CARRYING TICKS.



Tubes

USE AS AN AID IN THE CONTROL OF
LYME DISEASE CARRYING TICKS.



TICK
Tubes

TICK
Tubes

DAMMINIX[®]
A TICK TOXICANT

USE AS AN AID
IN THE CONTROL
OF LYME DISEASE
CARRYING TICKS.

TREATS APPROXIMATELY
5,500 SQUARE FEET

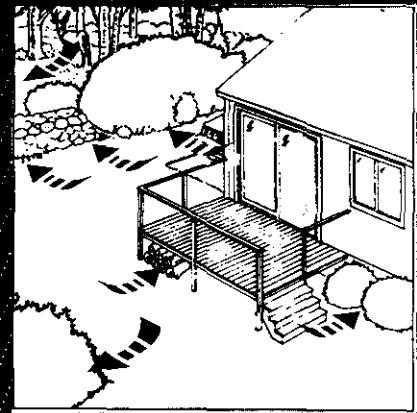
6 TUBES • TREATS APPROXIMATELY 5,500 SQ. FT.

DAVITA, INC. • 1000 W. 100TH ST. • SUITE 300 • WESTLAKE, OHIO 44190 • (216) 338-8000 • FAX (216) 338-8001
EPA REG. NO. 100-5718-1001 • U.S. PATENT NO. 5,119,410 • HOME DEPOT • 25000 ROUTE 1 • WILMINGTON, MA 01897 • 508-653-5678 • 508-653-5678 • 508-653-5678

WBE
5/5

USE AS AN AID IN THE CONTROL OF
LYME DISEASE CARRYING TICKS.

Tubes



Tubes



-TREATS APPROXIMATELY
5,500 SQUARE FEET

USE AS AN AID IN THE CONTROL OF
LYME DISEASE CARRYING TICKS.

DAMMINIX™ A TICK TOXICANT As an aid in the control of ticks that may carry Lyme Disease that infest mice and nests of mice found around yards, play areas, parks, brush paths, and in woodlands, or open grasslands. Tubes should be positioned so that mice have access to the open ends. Product works best if not covered by leaves or other material.

EPA Reg. No. 56783-1	EPA Est. No. 5693 MAI
ACTIVE INGREDIENT	
+* Permethrin	7.4%
INERT INGREDIENTS	92.6%
	Total 100.0%

* (Deltamethrin 0.0001%, Cyfluthrin 0.0001%, Deltamethrin 0.0001%, Cyfluthrin 0.0001%, Deltamethrin 0.0001%, Cyfluthrin 0.0001%)
† In Massachusetts, Mfr. 251, and in other states, 55X, 118885

CAUTION: KEEP OUT OF REACH OF CHILDREN
Statement of Practical Treatment
IF SWALLOWED - Contact a physician or Poison Control Center immediately.
IF ON SKIN - Remove contaminated clothing, and wash affected areas with soap and water.
IF IN EYES - Flush with plenty of water. Call a physician if irritation persists.

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

FOR OUTDOOR APPLICATION ONLY: For the reduction of ticks associated with the mice that serve as reservoirs for pathogenic strains of Lyme disease and tularemia. Ticks feeding on these animals become infested and transmit the ticks to humans, dogs, and horses. For best results, place tubes flat on the ground in open brush, over the wooded areas to be treated. The maximum distance between tubes should not exceed 10 yards in any direction. Treatment should be limited to areas inhabited by mice and their nests include mown lawns

or open grasslands. Tubes should be positioned so that mice have access to the open ends. Product works best if not covered by leaves or other material.

FOR TREATMENT AROUND YARDS: Place tubes within 1 yard of the edge of mown lawns, in flower gardens, under bushes and along fences, wherever mice may reside. For complete coverage, all brush-covered or wooded areas within 50 yards surrounding the yard area to be protected should be treated.

FOR TREATMENT OF WOODLOTS: Tubes should be placed in a contiguous array, such as a "20ft design" with no more than 10 yards between tubes in any direction. For complete coverage, apply tubes up to the brush-covered edge surrounding the woodland. Tubes placed over thickets or rotting logs within the woodland will be more effective than those placed in more open woodland terrain.

Tubes may be applied anytime between April 1 and mid-September, but should be applied at least twice a year. For best results, apply just prior to the feeding activity periods for nymphal (June-June) and larval (August-September) ticks. Tubes may also be replaced when nesting material is completely removed.

STORAGE AND DISPOSAL:
Store at room temperature. Do not contaminate water, food or feed by storage and disposal. Do not reuse empty tubes. The tubes and uncoated cotton are biodegradable and may be left at the application site. If disposal is desired, wrap tube and put in trash collection.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
Avoid contact with eyes and skin. Contact with skin may result in temporary numbness and tingling sensations. Wash thoroughly with soap after handling.

ENVIRONMENTAL HAZARDS
This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by disposal of wastes or equipment washwaters.

© 1986, ECHOHEALTH, INC. P.O. BOX 2147, BOSTON, MASSACHUSETTS 02106-2147 617-742-2400 CONTENTS 10 Damminix Tubes, each containing 4.5 grams

25 APR 1996
56783-1