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DEC 12 1996

Mr. Joseph E. Dyer
PM Resources, Inc.
13001 St. Charles Rock Road
Bridgeton, MO 64044

Dear Mr. Dyer:

Subject: Amendment: Update Label/Change Product Name
Pyrethroid W.B. Concentrate
EPA Registration Number 67517-60
Your submission dated August 6, 1996

This 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 labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. The bullet "recommended for agricultural/ commercial use" should be revised to read "For Agricultural/ Commercial Use Only" and placed beneath the product name.

b. Revise the Precautionary Statements section by deleting "Harmful if swallowed or absorbed through the skin. Avoid contact with skin.". These statements are not required based upon the results of the acute toxicity results.

c. Under Precautionary Statements delete the "If In Eyes" section and the "If inhaled" section. Likewise these statements are not required based upon acute toxicity results.

d. Following the site aircraft add in parenthesis (cargo area only.

e. Revise the sentence under Hose End Sprayer to read "Spray Walls and surfaces thoroughly but do not allow run-off to occur."

The comment that CRP is required for this product in our April 10, 1996 letter was in error. As you correctly state the results of the toxicity data do not trigger the requirements for CRP.

3. Submit two (2) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

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,

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

Enclosure

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**PYRETHROID W.B. CONCENTRATE
MULTI-PURPOSE 5.7% E.C.**

EPA Reg. 67517-60
EPA Est. No. 67517-MO-1

- *Water base product*
- *Contains Bitrex*
- *Recommended for agricultural / commercial use*
- *Broad spectrum multi-use insecticide*
- *Quick knockdown*
- *For use outdoors and in homes, kennel, and non-food areas of commercial buildings, institutions, warehouses, theaters, offices buildings, schools, motels, hotels, restaurants, and food/feed processing establishments.*
- *For control of fleas, brown dog ticks on premises and on dogs*
- *Residually controls fleas and ticks on dogs for 35 days*
- *Aids in control of ticks on dogs for an additional 2 weeks.*

ACTIVE INGREDIENT:

* Permethrin: (3-phenoxyphenyl) methyl(+/-) cis/trans
3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate 5.7%

INERT INGREDIENTS..... 94.3%
100.0%

- * Cis/trans ratio: Max. 65% (+/-) trans and min. 35% (+/-) cis.
- * Contains 0.478 lbs. permethrin per gal. (54 grams permethrin per quart)

KEEP OUT OF REACH OF CHILDREN

CAUTION

**SEE SIDE/BACK PANEL FOR
ADDITIONAL PRECAUTIONARY STATEMENTS**

NET 32 FL. OZ.

Manufactured by:
PM RESOURCES, INC.
13001 St. Charles Rock Road
Bridgeton, MO. 63044

ACCEPTED
with COMMENTS
in EPA Letter Dated

12 DEC 1996

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

67517-60

DRAFT LABEL
BACK/SIDE PANEL

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, absorbed through the skin or inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. May cause eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Wear full-faced gas mask with canister type recommended for general insecticide protection for applying indoors as a space spray or fog.

STATEMENT OF PRACTICAL TREATMENT

- If On Skin:** Wash with plenty of soap and water. Get medical attention.
- If Inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.
- If Swallowed:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger, or if available by administering syrup of ipecac. **IF PERSON IS UNCONSCIOUS, DO NOT GIVE ANYTHING BY MOUTH AND DO NOT INDUCE VOMITING.**
- If In Eyes:** Flush eyes with plenty of water. Call a physician if irritation persists.

NOTE TO PHYSICIAN: Do not administer or instill milk, cream or other substances containing vegetable or animal fats which enhance absorption of lipophilic substances.

ENVIRONMENTAL HAZARD

This pesticide is highly toxic to fish. 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 apply where run-off is likely to occur. Do not apply when wind speeds exceed 10 mph. Do not contaminate water when disposing of equipment washwaters. Shrimp and crab may be killed if application rates recommended on this label are exceeded. Use with caution where these are important resources. This pesticide is highly toxic to bees exposed to direct treatment or to residues remaining on the treated area. 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.

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DRAFT LABEL
BACK/SIDE PANEL

PHYSICAL CHEMICAL HAZARDS

Do not use or store near heat or open flame. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

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

To prepare dilutions, the concentrate should first be stirred or agitated well. Add the required amount of concentrate to water or oil and blend thoroughly. Do not hold dilutions for more than 24 hours.

For maximum effectiveness, a combination of localized application and space treatment is recommended. Remove pets, birds and cover fish aquaria before spraying.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared food is served such as dining rooms but excluding areas where foods may be prepared or held. 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.

NON FOOD/FEED AREAS including (but not limited to) 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).

Do not apply to classrooms when in use. Do not apply this product in patient rooms or in any rooms when occupied by the elderly or infirm.

Do not allow spray treatment to contaminate pasture land, cropland, poultry ranges or water supplies. Do not use on crops used for food, forage or pasture.

INDOOR USE AREAS

Aircraft ✓	Grain Elevators	Kennels	Ships' Holds
Bakeries	Granaries	Meat Packing Plants	Supermarkets
Beverage Plants	Homes	Motels	Truck Trailers ✓
Canneries	Hospitals (non-patient areas)	Office Buildings	Warehouses
Flour Mills	Hotels	Railroad Cars ✓	
Food Processing Plants	Industrial Installations	Schools	

See Following Tables for Use Directions

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APPLICATIONS SITES	PESTS CONTROLLED	USE DIRECTIONS	DILUENT	DILUTION RATE	APPLICATION RATE	DOSE RATE
<u>AS A SURFACE SPRAY</u> Aircraft, Bakeries, Beverage Plants, Canneries, Flour Mills, Food Processing Plants, Grain Elevators, Granaries, Homes, Hospitals, Hotels, Industrial Installations, Kennels, Meat Packing Plants, Motels, Office Buildings, Railroad Cars, Restaurants, Schools, Ships' Holds, Supermarkets, Truck Trailers, and Warehouses.	Cockroaches, Waterbugs, Palmetto Bugs, Ants, Silverfish, Fireboats, Spiders, Crickets, Millipedes, Centipedes, Sowbugs, Pillbugs, Clover Mites, Cheese Mites, Granary Weevils, Rice Weevils, Confused Flour Beetles, Red Rust Flour Beetles, Sawtoothed Grain Beetles, Spider Beetles, Cigarette Beetles, Drugstore Beetles, Mealworms, Grain Mites, and Cadellies	For initial clean up of severe insect infestations: Use a good sprayer adjusted to deliver a coarse wet spray. Direct the spray into hiding places cracks and crevices, under pallets, around containers of stored foods, around the base of machinery and behind shelves and drawers. Spray bookcases for Silverfish. Spray ant trails, nests and points of entry.	Water	1 part concentrate in 7 parts water (18 fl. ounces per gallon)	1 gallon to 750 square feet of surface	
		For normal infestations: Use a good sprayer adjusted to deliver a coarse wet spray. Direct the spray into hiding places, cracks and crevices, under pallets, around containers of stored foods, around the base of machinery and behind shelves and drawers. Spray bookcases for Silverfish. Spray ant trails, nests and points of entry.	Water	From 1 to 2 parts concentrate to 28 parts water (4.5 - 9 fl. ounces per gallon)	1 gallon to 750 square feet of surface	
	Carpet Beetles	Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, closets and infested area of shelving. Repeat treatment as necessary.	Water	1 part concentrate to 14 parts water (9 fl. ounces per gallon)		
	Bedbugs	Spray mattresses lightly particularly around tufts and seams. Take beds apart and spray in all joints. Treat Baseboards, molding and floors. Allow all treated articles to thoroughly dry before use. Repeat treatment as needed.	Water	1 part concentrate in 14 parts water (9 fl. ounce per gallon)		
	Fleas 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 localized areas of floor and floor covering. Fresh bedding should be placed in animals quarters following treatment.	Water	From 1 to 2 parts concentrate to 28 parts water (4.5 - 9 fl. ounces per gallon)		
<u>ON DOGS</u>	Fleas and Ticks	<u>ON DOGS: To control fleas, ticks</u> <u>AS A SPRAY</u> - Start spraying diluted product 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 wets thoroughly. Do not spray into eyes and face. Avoid contact with genitalia. Repeat as necessary. Do not use on old, sick or debilitated animals. <u>AS A DIP</u> - Wet the dog with water before treatment. Sponge, dip or pour diluted product on the dog until its fur and skin are thoroughly wet, making sure that the animal's entire body is treated, including the legs and underbody. Do not treat the dog's face. NOTE: NOT RECOMMENDED FOR USE ON	Water	1 to 1.5 parts concentrate in 64 parts water (2 to 3 fl. ounces per gallon)		

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APPLICATIONS SITES	PESTS CONTROLLED	PUPPIES LESS THAN FOUR WEEKS OLD.	DILUENT	DILUTION RATE	APPLICATION RATE	DOSE RATE
		USE DIRECTIONS				
Walls, ceilings, moldings, screens, door frames, beams, light cords, and similar resting places.	Mosquitoes, Wasps, Gnats, Skippers	Treat surfaces using coarse wet spray. Spray to run off.	Water	1 part concentrate in 14 parts of water (9 fl. ounces per 1 gallon water)		
LIVESTOCK SPRAY: Dairy & Beef Cattle, Sheep, Goats, Swine, Horses and Poultry. (For swine, do not ship animals for slaughter within 5 days of last treatment)	Horn Flies, House flies, Mosquitoes and Gnats	Apply to wet the hair thoroughly, with particular attention to topline, underline, flanks, withers, and other infested areas. Repeat treatment at intervals of 5 to 12 days for small insect populations or as needed when flies are emerging in large numbers.	Water	1 part concentrate in 68 parts water (1.0 pt. per 8.5 gallon water)		
BEST AVAILABLE COPY	Stables Flies, Horse Flies and Deer Flies	Apply a quart per adult animal to wet the hair thoroughly with particular attention to the legs, flanks, barrel, topline and other body areas commonly attacked by the flies. Repeat treatment as needed.	Water	1 part concentrate in 68 parts water (1.0 pint per 8.5 gallon water)		
	Face Flies	Apply using spray which produces large wetting droplets. Apply to the face of the animal before releasing to pasture. Apply sufficiently to wet the face but not more than 1.5 ounces per animal. Repeat daily as needed.	Water	1 part concentrate in 68 parts water (1.0 pint per 8.5 gallon water)		
	Lice (including Poultry Lice), Northern Fowl Mites, Mange	Spray roost, walls and nests or cages thoroughly. This should be followed by spraying of the birds with a fine mist. For swine, thoroughly spray animal including ears. Retreat at 14 days for mange. Treat walls and bedding.	Water	1 part concentrate in 68 parts water (1.0 pint per 8.5 gallon water)		1 gal per 100 birds
	Bedbugs and Mites in poultry hives	Spray crevices of roost, poles, cracks in walls and cracks in nests where the bedbugs and mites hide	Water	1 part concentrate in 120 parts water (1 pint per 8.5 gal. water)		
	Sheep "lick" or ked	Thoroughly wet all parts of the body by dipping or by spraying with sufficient pressure and with a nozzle adjustment to give penetration of the wool. Treat at a rate sufficient to wet the animal	Water	1 part concentrate in 120 parts water (1 pint per 8.5 gal. water)		
	Fleas on livestock (to kill and to protect against reinfestation)	Wet the animal by dipping or spraying	Water	1 part concentrate in 14 parts water (1 pint per 7 qts. water)		
AS A SPACE SPRAY LIVESTOCK PREMISES: Barns, Milking Parlors, Milk, Rooms, Dairies, Poultry Houses, Swine and Livestock Housing	Flies, Mosquitoes and Gnats	Apply as a fog or fine mist, directing the spray toward the ceiling and upper corners until the area is filled with mist, using about 2 ounces per 1000 cubic feet of space. For best results, close doors and windows before spraying and keep them closed for ten to fifteen minutes. Ventilate area before entering.	Water	1 part concentrate in 14 parts water (1 pint per 7 qts. water)		

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APPLICATIONS SITES	PESTS CONTROLLED	USE DIRECTIONS	DILUENT	DILUTION RATE	APPLICATION RATE	DOSE RATE
Bakeries, Beverage Plants, Canneries, Flour Mills, Food Processing Plants, Granaries, Homes Hospitals, Hotels, Industrial Installations, Kennels, Meat Packaging Plants, Motels, Office Buildings, Railroad Cars, Restaurants, Schools, Ships' Holds, Supermarkets, Truck Trailers, Warehouses	House Flies, Fruit Flies, Gnats, Mosquitoes, Skipper Flies, Wasps, Hornets, Bees, Black Flies, Small Flying Moths.	<p>Apply with mechanical or compressed air equipment (non-thermal) adjusted to deliver a fine mist. Close doors and windows and shut off ventilating systems. When using an oil dilution for space spraying, extinguish all flames and pilot lights when applying.</p> <p>For rapid control of House Flies, Fruit Flies, Gnats, Mosquitoes, Skipper Flies, Wasps, Hornets, Bees, Black Flies, Small Flying Moths, direct spray at an upward angle distributing it uniformly through the entire area at a rate of 1 ounce per 1,000 cubic feet of space. Keep area closed for at least 10 minutes. Vacate areas after treatment and ventilate and sweep up dead insects before reoccupying.</p> <p>For rapid kill of exposed or accessible stage of other insects named on this label, apply using conventional, mechanical or compressed air equipment (non-thermal) following direction for space spraying.</p>	Water	1 part concentrate in 14 parts water (9 fl ounces per gallon)	1 ounce per 1,000 cubic feet	
Animal House, Corrals	Mosquitoes, Gnats, biting and non-biting Midges, Black Flies, and other biting Flies.	<p>Apply using vehicle mounted ULV equipment to create an insecticidal swath. For best results apply when there is a light breeze (i.e. about 5 mph) and apply in direction of breeze to obtain maximum swath and better distribution. Do not apply if winds exceed 10 mph.</p> <p>The target dose rate to be applied is up to 0.007 lb a.i. per acre. This can be achieved under different conditions by altering the flow of insecticide from the equipment and/or the speed of the vehicle. Apply 3.5 to 7.0 fluid ounces per minute at vehicle speeds of 5-10 miles per hour using swath widths of 150-300 feet as appropriate to local conditions.</p> <p>At higher vehicle speeds flow rates should be increased proportionately to achieve the target dose rate.</p> <p>Not to be used within 100 feet (30 meters) of lakes and streams.</p> <p>In treatment of corrals, feed lots, swine lots and zoos, cover any exposed drinking water, drinking fountains and animal feed before application.</p> <p>Allow 24 hours before retreating. Do not apply more than once in a 24 hour period.</p>	Oil or Water	2 parts concentrate with 1 part suitable oil solvent, or at proportional oil dilutions calculated on the basis of vehicle speed and swath width to achieve the target dose.	Dependent on swath width, flow rate and speed of vehicle	up to 0.007 lbs. of active ingredient per acre.

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APPLICATIONS SITES	PESTS CONTROLLED	USE DIRECTIONS	DILUENT	DILUTION RATE	APPLICATION RATE	DOSE RATE
BARRIER SPRAY Perimeter of residential yards, public facilities, paths, and recreational areas.	As an aid in reducing mosquito annoyance. To kill and control biting and non-biting midges, deer flies and other biting flies.	Apply when walking at a speed of approximately 2 mph or a swath of 50 feet treating approximately 0.2 acre/ minute.	Oil or Water	2 parts concentrate with 1 part suitable oil solvent, or at proportional oil dilutions calculated on the basis of vehicle speed and swath width to achieve the target dose		

HOSE-END SPRAYER: To control listed insects, shake well before applying. Connect nozzle to hose; remove cap, insert dip tube and screw bottle onto nozzle. Turn on water at the tap. When ready to treat, place finger over the hole on right side of nozzle and the liquid will mix automatically at the proper ratio. Depending on type of sprayer used, follow dilution directions shown on sprayer. Apply to surfaces in dairies, barns, feed lots, stables, poultry houses, swine and livestock housing; to control House Flies, and other manure breeding flies. Also aids in control of Cockroaches, Ants, Spiders, Mosquitoes, Crickets, and Face Flies. Walk and spray at a steady pace. Spray walls and surfaces to the point of run-off. Treat no more than once every two weeks. Do not contaminate animals feed or water by spray.

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STORAGE AND DISPOSAL

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

Pesticide Storage and Spill Procedures:	Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste
Pesticide Disposal:	Pesticide spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.
Container Disposal:	Triple rinse (or equivalent) then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.
CONTAINERS ONE GALLON AND SMALLER:	Do not reuse container. Wrap container in several layers of newspaper and discard in trash.
CONTAINERS LARGER THAN ONE GALLON:	Metal Containers - Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities. Plastic Containers - Triple rinse or equivalent, then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, if allowed by State and local authorities, by burning. If burned, stay out of smoke. Glass Containers- Triple rinse or equivalent, then dispose of in a sanitary landfill or by other approved State and local procedures.

NOTICE OF WARRANTY

PM RESOURCES, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORD WITH THE STATEMENTS MADE ON THIS LABEL.

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