



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 29 2000

Ms. Kim Davis
Consultant for Contract Packaging, Inc
RegWest Company
30856 Rocky Road
Greeley, CO 80631-9375

Subject: Amendment to Label - Response to a Variety of PRN
R&M Permethrin .25% Spray
EPA Reg. No. 67572-42
Your Submission Dated October 13, 2000

Dear Ms. Davis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable, provided you make the labeling changes indicated below prior to release for shipment of the product bearing the amended labeling:

1. The retreatment statements should include a maximum frequency of application, such as: "... but not more than ___ times per ___."
2. Retain the asterix by the ingredient statement and indicate the associated cis/trans ratio.

Submit two copies of your final printed labeling before you release this product for shipment. A stamped copy of the labeling is enclosed for your records. If you require any further correspondence on this matter, please contact Linda Werrell Gerber (703-308-8033) of my staff.

Sincerely

A handwritten signature in cursive script, appearing to read "George T. LaRocca".

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

Enclosure

R & M PERMETHRIN .25% SPRAY

For Domestic Use Both Indoors and Outdoors

A Stable, Ready-to-Use Permethrin Emulsion Insecticide

Provides 90 Days [Three Months] Control of Roaches, Including the German and American Cockroaches

Keeps Killing Roaches up to 90 Days [3 Months]

For Control of Fleas, Brown Dog Ticks and Lice on Premises and on Dogs

Controls Fleas and Ticks on Dogs for 35 Days

Aids in Control of Ticks on Dogs for an Additional Two Weeks

Also for Use on Livestock: Cattle (Beef and Dairy), Goats, Hogs, Horses and Sheep

ACTIVE INGREDIENT:	
Permethrin (CAS No. 52645-53-1)	0.25%
OTHER INGREDIENTS	99.75%
Total	100.00%

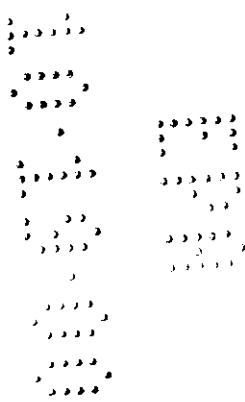
Keep Out of Reach of Children
CAUTION
See back panel for additional precautionary statements.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
NOV 29 2000
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
this pesticide is registered for the pesticide
registered under EPA Reg. No.
67572-42

EPA Reg. No. 67572-42 EPA Est. 67572-GA-1

Net Contents: ____ fl. oz.

Manufactured by:
CONTRACT PACKAGING, INC.
P.O. Box 1508
Covington, GA 30015-1508



{The following presents the entire text of the label when both domestic pet (dog) and non-domestic animal use directions will appear on the labeling:}

READ ENTIRE LABEL BEFORE EACH USE

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 in a cool, dry (preferably locked) place inaccessible to children and pets and away from heat or open flame. Store above 32°F. **Disposal:** Do not reuse empty container; wrap and put in trash.

Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container.

SHAKE WELL BEFORE USING

INDOOR APPLICATION

Only for spot application. Do not use as a space spray indoors. Do not apply to classrooms while in use. In the home, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food/feed.

Surface Spraying

For 90 days [three months] control of ants, cadelles, centipedes, cheese mites, cigarette beetles, clover mites, cockroaches, confused flour beetles, crickets, darkling beetles, drugstore beetles, firebrats, grain mites, granary weevils, meal worms, millipedes, palmetto bugs, pillbugs, rice weevils, rust red flour beetles, saw-toothed grain beetles, silverfish, scorpions, sowbugs, spiders, spider beetles and waterbugs: Use a good sprayer adjusted to a coarse wet spray. Direct the spray into hiding places, cracks and crevices, under pallets, around the base of machinery and 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. Repeat treatment as needed.

To control bedbugs: Lightly spray mattresses, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as needed.

To control fleas (adults and larvae) and ticks: 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. Place fresh bedding in animal quarters following treatment. Allow treated areas to thoroughly dry before allowing people or pets to contact them. Repeat treatment as needed.

To control clothes moths: Remove any infested articles from storage, thoroughly brush and air for several hours in sunlight if possible. Liberally apply spray to empty chests, closets, joints and crevices. After airing, lightly treat infested articles, keeping nozzle at least three feet 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 thoroughly dry before use.

Livestock

To protect cattle (beef and dairy), goats, hogs, horses and sheep from gnats, faceflies, horn flies, house flies and mosquitoes: Apply a light mist sufficient to wet the surface of the hair. For face flies, spray face and head, but do not spray into eyes.

To control deer flies, horse flies and stable flies: Apply at a rate of 2 ounces per adult animal, sufficient to thoroughly wet the hair. Repeat treatment daily or at intervals necessary to give continued protection.

To control blood-sucking lice: Apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

To control poultry lice: Thoroughly spray roosts, walls and nests or cages then spray a fine mist over the birds.

To control bedbugs and mites in poultry houses: Spray crevices of roost poles, cracks in walls and cracks in nests where the bedbugs and mites hide.

USE ONLY ON DOGS

Do Not Use on Cats or Kittens

To control fleas, ticks and lice: Use protective gloves or mitts when applying product. Start spraying 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 will penetrate to the skin. Make sure spray thoroughly wets hair, but do not saturate animal. Do not spray into the eyes or face. Avoid contact with genitalia. Do not reapply treatment for one month. Do not use on puppies under 12 weeks. Consult a veterinarian before using this product on debilitated, medicated, aged, pregnant or nursing animals.

OUTDOOR APPLICATION

To control ticks (perimeter treatment): Use this product as a residual treatment to control ticks, including Deer Tick (*Ixodes dammini*), Lone Star Tick (*Amblyomma americanum*), Brown Dog Tick (*Rhipicephalus sanguineus*), American Dog Tick (*Dermacentor variabilis*) and Western Black-legged Tick (*Ixodes pacificus*). For each area listed, apply until surface is wet (approximately 1 gal. per 750-1000 sq. ft.). 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 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 to 10 feet wide and adjacent to activity areas, especially where dense vegetation occurs.

FOR CONTROL OF GARDEN INSECTS

For use on asters, dahlias, roses and other ornamentals to kill Japanese beetles, aphids, exposed thrips, leafminers, red mites, spiders and whiteflies. Contact insects directly whenever possible. May be used on plants as a multipurpose spray in small gardens and for spot treatments of incipient insect infestations in large garden areas to prevent spreading. May also be used on other plants such as African violets, azaleas, begonias, camellias, carnations, chrysanthemums, crassula, dahlias, delphiniums, dogwoods, English ivy, eunonymus, fuschia, geraniums, grape vines, Kentia palms, laurels, marigolds, rhododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

Effective when used as directed against aphids, army worms, exposed thrips, Japanese beetles, clover mites, lace bugs, pavement ants, red and spider mites and whiteflies. When spraying plants, do not operate closer than 18 inches. Use a 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. Repeat treatment as infestations occur.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Humans: Thoroughly wash with soap and water after use and before smoking or eating. Avoid contamination of feed and foodstuffs. When used indoors remove pets and birds and cover fish aquariums before surface applications. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry. **Animals:** 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, immediately consult a veterinarian.

First Aid

If Swallowed	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor 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.
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Immediately rinse skin with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.	

Environmental Hazards

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

Buyer assumes all risk of use, storage or handling of this product no in strict accordance with this label.

To obtain additional information or in case of an emergency call 770-787-1977.

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

{The following verbiage will be utilized on labels bearing no domestic pet (dog) use directions:}

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 in a cool, dry (preferably locked) place inaccessible to children and pets and away from heat or open flame. Store above 32°F. **Disposal:** Do not reuse empty container; wrap and put in trash.

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Surface Spraying

For 90 days [three months] control of ants, cadelles, centipedes, cheese mites, cigarette beetles, clover mites, cockroaches, confused flour beetles, crickets, darkling beetles, drugstore beetles, firebrats, grain mites, granary weevils, meal worms, millipedes, palmetto bugs, pillbugs, rice weevils, rust red flour beetles, saw-toothed grain beetles, silverfish, scorpions, sowbugs, spiders, spider beetles and waterbugs: Use a good sprayer adjusted to a coarse wet spray. Direct the spray into hiding places, cracks and crevices, under pallets, around the base of machinery and 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. Repeat treatment as needed.

To control bedbugs: Lightly spray mattresses, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as needed.

To control fleas (adults and larvae) and ticks: 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. Place fresh bedding in animal quarters following treatment. Allow treated areas to thoroughly dry before allowing people or pets to contact them. Repeat treatment as needed.

To control clothes moths: Remove any infested articles from storage, thoroughly brush and air for several hours in sunlight if possible. Liberally apply spray to empty chests, closets, joints and crevices. After airing, lightly treat infested articles, keeping nozzle at least three feet from fabric to avoid staining.

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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 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 to 10 feet wide and adjacent to activity areas, especially where dense vegetation occurs.

FOR CONTROL OF GARDEN INSECTS

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PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION: Thoroughly wash with soap and water after use and before smoking or eating. Avoid contamination of feed and foodstuffs. When used indoors remove pets and birds and cover fish aquariums before surface applications. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry.

First Aid

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Environmental Hazards

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

Buyer assumes all risk of use, storage or handling of this product no in strict accordance with this label.

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}

{The following verbiage will be utilized on labels bearing only domestic pet (dog) use directions:}

READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS
Do not use on Cats or Kittens

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 in a cool, dry (preferably locked) place inaccessible to children and pets and away from heat or open flame. Store above 32°F. **Disposal:** Do not reuse empty container; wrap and put in trash.

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