

67572-51

6-30-2004

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

United States Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number EPA Reg. No. 67572-51	2. EPA Product Manager George T. LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) R & M Synergized Permethrin Powder #1	PM #	
5. Name and Address of Applicant (Include ZIP Code) Contract Packaging, Inc. c/o RegWest Company, LLC 30856 Rocky Road Greeley, CO 80631-9375 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section – II

<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.	NOTIFICATION JUN 30 2004
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Submit notification of label revision (PR Notice 2001-6) per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR § 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR § 152.46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section – III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
*Certification must be submitted	If "Yes" Unit Packaging Wgt.	No. Per Container	If "Yes" Packaging Wgt.	No. Per Container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					<input type="checkbox"/> Other (Specify): _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph	<input type="checkbox"/> Stenciled		
		<input type="checkbox"/> Paper glued	<input type="checkbox"/> Other _____		


Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).		
Name Kim Davis, CC, APC, Manager	Title Consultant/Agent	Telephone No. (Include Area Code) (970) 353-0611 / kim@regwest.com

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)
.....

2. Signature 	3. Title Consultant/Agent
4. Typed Name Kim Davis, CC, APC, Manager	5. Date June 15, 2004

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R & M Synergized Permethrin Powder #1

Recommended Only for Commercial/Agricultural Use

**A Broad Spectrum Ready-to-Use Insecticide Highly Effective Against
Ants, Bees, Carpenter Ants, Carpet Beetles, Centipedes, Cockroaches, Crickets, Earwigs, Firebrats,
Fleas, Flour Beetles, Grain Beetles, Ground Beetles, Millipedes, Mole Crickets, Moths, Pillbugs,
Scorpions, Silverfish, Sowbugs, Spiders, Termites, Ticks, Wasps
And Other Pests as Listed on Back Panel**

Provides Quick Killing Action and Residual Control of Fleas and Ticks on Dogs for up to 14 Days

Mild Fresh Citrus
[or other description]
Scent

Non-Staining Formulation

Active Ingredients:

Piperonyl Butoxide, Technical (CAS No. 51-03-6)	1.00%
*Permethrin (CAS No. 52645-53-1)	0.25%
Other Ingredients	98.75%
Total	100.00%

*(3-phenoxyphenyl) methyl (±) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethyl-cyclopropanecarboxylate. Cis/trans ratio: Min. 35% (±) cis and max. 65% (±) trans.

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

EPA Reg. No. 67572-51

EPA Est. 67572-GA-1

Net Contents: ____ oz. [lb.]

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

NOTIFICATION
JUN 30 2004

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READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS
Do not Use on Cats

DIRECTIONS FOR USE

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

Storage and Disposal

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

Pesticide Storage and Spill Procedures: Store in a cool, dry (preferably locked) place inaccessible to children and pets. Keep away from moisture. Sweep up and dispose of with chemical waste. **Pesticide Disposal:** Pesticide that cannot be used according to label instructions must be disposed of at or by an approved waste disposal facility.

Container Disposal: Completely empty container [bag] by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of container [bag] in a sanitary landfill or by incineration if allowed by state and local authorities.

{Containers for domestic use of one pound and smaller:}

Storage: Store in a cool, dry (preferably locked) place inaccessible to children and pets. Keep away from moisture.

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.

This powder provides effective control of pests in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include but are not limited to: private residences, apartment buildings, mausoleums, laboratories, buses and the non-food/feed areas of stores, warehouses, hotels, industrial buildings, schools, nursing homes and hospitals (non-occupied patient areas), restaurants, food/feed manufacturing, processing and servicing establishments, vessels, rail cars, aircraft (only in cargo areas), trucks and trailers.

This powder provides quick killing action and long lasting control of fleas and ticks on dogs.

This powder is intended for application using hand or power duster or by other suitable means, to hiding and runway areas and those places where pests are found. For application directly into cracks and crevices, a bulbous duster or other suitable equipment may be used. Apply lightly and uniformly to infested areas. Pay particular attention to: cracks and crevices; service ducts; around electrical and telephone fittings and equipment; around water and sewer pipes; under and behind cabinets, refrigerators and sinks; around window and door frames; and along baseboards. A power duster is recommended for application to larger areas such as: false floors and ceilings; wall voids; and in attics and crawl spaces. The amount to be applied will vary with the site but should be in the range of 3 to 6 ounces of powder per 100 square feet. Control of insect pests (i.e., flying insects, insects in areas where visible dust deposits are undesirable, etc.) is frequently best achieved by using the powder in combination with spray treatments of one of the liquid products currently available. Repeat treatments as infestation warrants, but not more often than once per week.

Indoor Use

Ants, cockroaches (including adult and immature stages of both non-resistant and organophosphate and carbamate-resistant strains), crickets, firebrats and silverfish: Thoroughly apply at a rate of 3 to 6 ounces per 100 square feet to all areas where these pests crawl and hide, especially in cracks and crevices, and hidden surfaces around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves and in attics and crawl spaces. For **ants**, sprinkle freely around ant trails, doors and windows, and other places where ants enter premises, and around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and scatter powder freely on and around debris. Repeat treatment as infestation warrants, but not more often than once per week.

Carpenter ants: For effective control, locate and treat nests and surrounding areas at a rate of 3 ounces per 100 square feet. Apply around doors and windows and other places where ants enter premises and where they crawl and hide. Also force dust into infested wood through existing openings or newly drilled small holes.

Termites: Apply the powder at a rate of 3 to 6 ounces per 100 square feet to voids or channels in damaged wooden members of a structure, or to cracks, spaces or bearing joints between wooden members of a structure or between such members and the foundations, in locations vulnerable to termite attack. Drilling may be necessary prior to applying the powder to voids, cracks or joint spaces in vulnerable locations and to channeled sections of wood, but it must be

recognized that such drilling and treating of a timber in place may not result in satisfactory coverage of infested and vulnerable voids or galleries.

The purpose of such applications of this product is to kill workers or winged reproductive forms that may be present in the treated channels and spaces at the time of treatment. Such applications are not a substitute for mechanical alteration or soil/foundation treatment, but merely a supplement, particularly where use of other insecticides may pose an odor problem.

Spiders: Apply at a rate of 3 to 6 ounces per 100 square feet along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and other areas over which these pests may crawl.

Centipedes, Earwigs, Ground beetles, Millipedes, Pillbugs, Scorpions and Sowbugs: Apply at a rate of 3 to 6 ounces per 100 square feet around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

Brown dog ticks and fleas in buildings: Apply powder at a rate of 3 to 6 ounces per 100 square feet to infested areas such as pet beds and resting quarters, nearby cracks and crevices, under the edges of rugs and floor coverings, between and under cushions of upholstered furniture and other areas where these pests may be present. Remove and replace old pet bedding with clean, fresh bedding after treatment of pet areas.

Fleas and ticks on dogs: Liberally apply powder over the entire body. Work dust into hair by rubbing against the lay of the hair and around the feet, pads and between the toes until dust penetrates to skin. Contact ticks with powder. Take care not to get the powder in animal's eyes, nose or mouth. Do not reapply for 2 weeks. Do not use on puppies under 12 weeks. Consult a veterinarian before using this product on debilitated, medicated, aged, pregnant or nursing animals. Regularly dust bedding, kennel, sleeping areas, carpeting and furniture used by infested animals, applying at a rate of 3 to 6 ounces per 100 square feet. Repeat treatment as infestation warrants, but not more often than once per week.

Bees and wasps: It is generally advisable to treat bee and wasp nests in the evening when the insects are less active and have returned to the nest. Wear protective clothing if deemed necessary to avoid stings. Using hand or power duster or other suitable means, with extension tubes if necessary, thoroughly dust nest and entrance and surrounding areas where insects light. Nests in wall voids can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in, and reseal. For ground wasps, dust entrance and surrounding areas. For best results, carefully check nests one or two days after treatment to ensure satisfactory kill, then remove and destroy nest to prevent emergence of newly hatched insects. If removal is not feasible, retreat the nest, if necessary. Do not use this product to treat overhead nests.

Pantry Pests: drugstore beetles, flour beetles (confused and red), grain beetles (merchant, rusty and saw-toothed), lesser grain borers, rice weevils, spider beetles and tobacco moths: Treat exposed stages. For residual control apply dust at a rate of 3 to 6 ounces per 100 square feet in cracks and crevices behind and under cupboards and cabinets. Do not apply directly on food/feed, utensils or food/feed storage areas.

Carpet Beetles (black, furniture and varied): Dust at a rate of 6 ounces per 100 square feet on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Bedbugs: Dust mattresses at a rate of 3 ounces per 100 square feet, particularly around tufts and seams. Take beds apart and dust into all joints. Treat baseboards, moldings and floors. Repeat treatment if necessary.

Webbing clothes moths: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on the clothes. Do not apply to clothing.

Food/Feed Handling Establishments (places other than private residences in which food/feed is held, processed, prepared or served): NOT FOR USE IN FEDERALLY INSPECTED MEAT AND POULTRY PLANTS.

Non-food/feed areas: This powder may be used as a crack and crevice treatment or as a spot application in non-food/feed areas. All areas where insects hide or through which insects may enter should be treated. Do not use in the 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/feed is exposed or facility is in operation. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held. In the home, cover all food/feed processing surfaces and utensils during treatment or thoroughly washed before use. Cover or remove exposed food/feed. Non-food/feed areas are areas such as garbage rooms, lavatories, floor drains (to sewers) entries, vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, closets and storage (after canning or bottling).

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OUTDOOR USE

Perimeter Treatment: Use this powder as a residual treatment for control of **ants, bees, brown dog ticks, centipedes, cockroaches, crickets, earwigs, firebrats, fleas, ground beetles, millipedes, pillbugs, scorpions, silverfish, sowbugs, spiders, ticks and wasps.** Make a residual treatment around windows and doors, porches, screens, eaves, patios, garages, under stairways and in crawl spaces and other areas where pests hide. To help prevent invasion of buildings and structures by the above pests, treat a band of soil and vegetation 6 to 10 feet wide around and adjacent to the building or structure at a rate of 3 to 6 ounces per 100 square feet. Also treat the building foundation and crawl spaces where pests are active and may find entrance. Thoroughly and uniformly apply to the band area. Pay particular attention to ant hills and wasp nests in the band area. Wasp and bee nests in trees and shrubs may be treated as noted above.

Cockroaches in Sewers: Apply 6 ounces of powder per manhole using a power duster for knockdown and short-term population suppression. Where longer residual control (30 days) is desired, apply 10 ounces of powder per manhole.

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals

CAUTION: Humans: Harmful if inhaled, swallowed or absorbed through skin. Avoid breathing dust. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Thoroughly wash with soap and water after use. Remove contaminated clothing and wash before reuse. Do not apply this product in occupied patient rooms or in any rooms while occupied by the elderly or infirm. Do not apply to classrooms when in use. **Animals:** Do not apply product directly in/on eyes, mouth or genitalia of 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 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 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 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.

{Note: The First Aid statements' 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 aquatic organisms. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift 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.

This container is sold by weight, not by volume. You can be assured of the proper weight even though some settling of contents normally occurs during transportation and handling.

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.

June 15, 2004



Ms. Sherada Hobgood
Document Processing Desk – **NOTIF**
Office of Pesticide Programs – **7504C**
U.S. Environmental Protection Agency
1921 Jefferson Davis Highway
Crystal Mall #2, Room 266A
Arlington, VA 22202-4501

Dear Ms. Hobgood:

Subject: Contract Packaging, Inc.
R & M Synergized Permethrin Powder #1
EPA Reg. No. 67572-51

On behalf of its client **Contract Packaging, Inc.**, RegWest Company, LLC is submitting the attached materials as notification of label revision for subject product. RegWest Company, LLC will act as sole agent in this endeavor.

Attached are the following:

- 1. Application for Pesticide: Other
- 2. One **Reference Label** (illustrates the label revisions)
- 3. Two **New Labels** (incorporates the label revisions)

We are updating the disposal directions per PR Notice 2001-6. No other changes are being made to the label at this time. Because Contract Packaging does not market this product themselves, final printed labeling is not available.

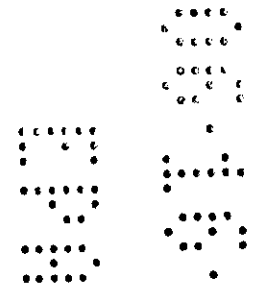
Please contact me at (970) 353-0611 or kim@regwest.com if you have any questions concerning this submission or require additional information.

Regards,
RegWest Company, LLC

Kim Davis, CC, APC, Manager
Consultant/Agent

Attachments

pc: CPI – Hacker, S.



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Greeley, CO 80631-9375
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Kim@regwest.com