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DEC 20 2000

Robert G. Butz, Ph.D.
ChemReg International, LLC
2239-H Tacketts Mill Drive
Lake Ridge, Virginia 22192-3026

SUBJECT: Amendment - Add Crop Uses to Technical Product
Product Name: Permethrin Technical
EPA Registration Number: 70506-4
Your Submission Dated December 8, 2000

Dear Dr. Butz:

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comments listed below:

1. Following Environmental Hazards add the following heading and statement:

Physical or Chemical Hazards
Do Not Use or Store Near Heat or Open Flame.

2. Revise the first statement under environmental hazards to read:

This product is extremely toxic to fish.

3. Is it your intention to exclude ULV mosquito control? If so qualify Mosquito Control on back of panel by adding "excluding ULV application." This would be consistent with the limitation under Non-Crop.

4. Add the following limitations under the heading "Note"

Not for Use to formulate products to be used:

- In warehouses where raw or cured tobacco is stored.
- In warehouses where raw agricultural commodities for food or feed are stored.
- In greenhouses where crops for food or feed are grown.
- For Mosquito Control (ULV) products.

5. Under Indoors qualify greenhouse with "(non-food crops)."

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

Submit two (2) 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 Branch
Registration Division (7505C)

Permethrin Technical

For Formulation Use only in the production of insecticide/termiticide products

EPA Reg. No. 70506-4

EPA Est. No.

Active Ingredient

Permethrin*	94.0%
Other Ingredients	6.0%
TOTAL	100.0%

*cis/trans ratio: Max. 42% (±) cis and min. 58% (±) trans

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION

Harmful if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID:	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
IF SWALLOWED	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor • Do not induce vomiting unless told to do so by a poison control center or doctor • Do not give any liquid to the person. • 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 • Rinse skin immediately 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

**FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL
1-800-F-A-S-T-M-E-D (327-8633)**

NOTE TO PHYSICIAN: Treatment is controlled removal of exposure followed by symptomatic and supportive care.

United Phosphorus Inc.
 1209 Orange Street
 Wilmington, DE 19801

ACCEPTED
with COMMENTS
in EPA Letter Dated

Net Contents:
 DEC 20 2000

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the product registered under EPA Reg. No. 70506-4

**FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call
CHEMTREC 1-800-424-9300**

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, birds, and other wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other bodies of waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or the Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS.

STORAGE AND DISPOSAL

PROHIBITIONS

Do not contaminate water, food or feed by storage, disposal or cleaning of equipment. Open dumping is prohibited.

STORAGE

Keep pesticide in original container.
Store in cool, dry place. Protect from excessive heat.
Do not contaminate food or foodstuffs.
Do not store or transport near feed or food.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

Triple rinse (or equivalent). Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or dispose of by other procedures allowed by State and local authorities.

This product is intended only for use in the formulation of other permethrin

insecticide/termiticide products. Products formulated using Permethrin Technical will require registration with the Environmental Protection Agency.

Only for formulation of Insecticide/Termiticide products intended for the following uses:

Indoors: Wood and wood structure protection (against termites, beetles, etc.) and general insect pest control in buildings, structures, transports and their immediate surroundings, including but not limited to: agricultural (exterior surfaces of non-poultry facilities; interior and exterior surfaces of poultry houses), industrial and commercial buildings, houses, apartment buildings, laboratories, buses, greenhouses and the non-food/feed areas of stores, warehouses, vessels, railcars, trucks, trailers, aircraft, schools, nursing homes, hospitals (non-patient areas), restaurants, hotels, food manufacturing, processing and servicing establishments, and plantscapes in interior gardens.

Terrestrial Outdoor (Non-Food) Uses: Ornaments including non-bearing fruit and nut trees grown for ornamental purpose, evergreens, ornamental trees, shrubs, vines, ground covers, lawn and turfgrass grown around industrial and commercial buildings, private homes, duplexes, townhouses, condominiums, house trailers, apartment complexes, carports, garages, sport fields and complexes, tennis courts, fence lines, storage sheds, barns, and their structures (fences, posts, slabs, crawlspaces, foundations, porches, window frames, eaves, patios, garages) and refuse dumps.

Greenhouse: Indoor and outdoor (shade house) grown floral and foliage plants (non-food uses).

Domestic Indoor/Outdoor (non-commercial homeowner) Uses: Yards, lawns, turf, domestic ornamental plantings (trees, shrubs, flowers), ornamental fruit and nut trees around residential sites, porches, patios, foundations, steps, eaves, buildings (for termites, beetles, ticks, including ticks which carry Lyme disease and Rocky Mountain Spotted Fever, and directed pest control for ants, cockroaches, spiders and other nuisance insect pests).

Non-Crop: Non-food producing areas such as, farmyards, fuel storage areas, fence rows, rights-of-way (highway, railroad, utility), airports, recreation areas (fair grounds, race tracks, tennis courts, fence rows, hedgerows, non-agricultural areas for directed pest control to pests (beehives, bee nests, ant mounds, termite hills/nests) (excluding mosquito control (ULV) products).

Terrestrial Food:

Alfalfa	Lettuce, Head
Almond	Melons, cantaloupe
Amaranth, Chinese	Mushrooms
Apple	Onion
Artichoke	Orach (mountain spinach)
Asparagus	Papaya
Avocado	Parsley
Broccoli	Peach
Broccoli, Chinese	Pear
Cabbage	Peppers(bell, chili, sweet)
Cauliflower	Pistachio
Celery	Potato
Celtuce	Pumpkin
Chard, Swiss	Range, Grasses
Cherry	Rhubarb
Chervil	Roquette (arrugula)
Chrysanthemum, garland	Soybeans
Collards	Spinach
Corn, Field	Spinach (New Zealand)
Corn, Pop	Squash (winter)
Corn, Sweet	Sunflower
Cotton	Tomato
Cress, Garden	Turnip
Cress, Upland	Walnut
Cress, Water	Winter Purslane
Cucurbit Vegetable Group	
Dandelions	
Dock (sorrel)	
Eggplant	
Endive (escarole)	
Fennel	
Filbert (hazelnut)	
Garden Purslane	
Garlic	
Grasses Group	
Horseradish	
Kiwi fruit	
Leafy Vegetables	

Domestic Farm Animals

- Cattle
- Horses
- Swine
- Poultry

Companion Animals

General Outdoor Insect Control

Domestic Outdoor - Wood or Wood Structure Protection Treatments

Mosquito Control

Fiber Product Protection

Human Articles and Materials

Other Uses

1. Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
2. Uses for experimental purposes that are in compliance with US EPA requirements.

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LIMITED WARRANTY:

United Phosphorus, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for use under average conditions when used strictly in accordance with the directions on the labeling. United Phosphorus does not make nor authorizes any agent or representative to make, any other warranty, guarantee or representations, express or implied, concerning this product. Specifically, **"NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE IS MADE"**.

Critical and unforeseeable factors beyond United Phosphorus' control prevent it from eliminating all risks in connection with the use of this product. Such risks include, but are limited to, damage to plants and crops to which product is applied, lack of complete control over the handling and application of this product, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit under average conditions for the use stated on the labeling and even though label directions are assumed by United Phosphorus as stated above, resulting from handling, storage and use of the product.

Precautions stated on the labeling should be followed to avoid hazardous exposure to the product.

08/18/2000