

Ms. Rebecca A. Clemmer
United Phosphorus, Inc.
423 Riverview Plaza
Trenton, NJ 08611

Dear Ms. Clemmer::

Subject: Label Amendment- First Aid Statement and Warranty
Statement
Permethrin Technical
EPA Registration Number 70506-4
Your submission dated February 7, 2006

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable with the following comments:

1. Either replace the warranty statement section with the one approved by the Agency in your label dated August 23, 2003 or revise the proposed one as follows.

The following portions of the warranty statement need to be deleted or revised: a) "that at the time of delivery", b) "in the Directions for Use", c) "under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lieu or encumbrance". With respect to item (c) the Agency does not understand what this means. You can restate this and submit it for reevaluation but as currently written it appears to be confusing and misleading to the consumer.

A stamped copy of the label is enclosed for your records.

Sincerely,

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

Enclosure

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PERMETHRIN TECHNICAL

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

ACTIVE INGREDIENT:

Permethrin* 94.0%

INERT INGREDIENTS 6.0%

TOTAL 100.0%

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

ACCEPTED
WASH CO. INCORPORATED
10101 Lister Blvd

MAR 23 2006

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
EPA Reg. No. 70506-4
70506-4

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND 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 with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED:	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a 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. • Rinse skin immediately with plenty of water for 15 to 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 to 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 CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident, call CHEMTREC at 1-800-424-9300.

See other panels for additional precautionary statements.



United Phosphorus, Inc.
423 Riverview Plaza
Trenton, NJ 08611
1-800-247-1557
www.upi-usa.com

EPA Reg. No. 70506-4
EPA Establishment No. 41876-IY-001
Net Contents: 200 kg

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other bodies of water 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.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near open heat or open flame.

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.

PESTICIDE STORAGE

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

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed 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 (non-food crops) 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 serving establishments, and landscapes in interior gardens.

Terrestrial Outdoor (Non-Food) Uses: Ornamentals including non-bearing fruit and nut trees grown for ornamental purposes, 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, slabs, crawlspaces, foundations, porches, window frames, eaves, patios, garages) and refuse dumps.

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

Domestic Indoor/Outdoor (noncommercial 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 pesticide control for ants, cockroaches, spiders and 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 (fairgrounds, race tracks, tennis courts, fence rows, hedgerows, non-agricultural areas for directed pest control to pests (beehives, ant mounds, termite hills/nests).

Terrestrial Food: Alfalfa, Almond, Apple, Artichoke, Avocado, Broccoli, Cabbage, Cauliflower, Celery, Celtuce, Cherry, Chervil, Chinese Amaranth, Chinese Broccoli, Collards, Corn (Field, Pop and Sweet), Cucurbit Vegetable Group, Dandelion, Dock (sorrel), Eggplant, Endive (escarole), Fennel, Filbert, (hazelnut), Garden Purslane, Garden Cress, Garlic, Garland Chrysanthemum, Head Lettuce, Horseradish, Leafy Vegetables, Melons (Cantaloupe), Mushrooms, Onion, Orach (mountain spinach), Papaya (FL only), Parsley, Peach, Pear, Peppers (bell), Pistachio, Potato, Pumpkin, Range Grasses (NM only), Rhubarb, Roquette (arrugula), Soybeans, Spinach, Spinach (New Zealand), Squash (winter), Swiss Chard, Tomato, Turnip, Upland Cress, Walnut, Water Cress, Winter Purslane.

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 registrations.
2. Uses for experimental purposes that are in compliance with US EPA requirements.

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.

**CONDITIONS OF SALE
AND LIMITATION OF WARRANTY AND LIABILITY**

United Phosphorus, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it is reasonably fit for the purposes referred to in the Directions for use, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. UNITED PHOSPHORUS, INC. EXPRESSLY DISCLAIMS ANY

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IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.

EPA Approved 8/23/01

Rev. 2/6/06