

Mr. Lawrence A. Miller
Agent for LG Life Sciences Ltd.
115 Obtuse Hill
Brookfield, Connecticut 06804

JUL 27 2005

Dear Mr. Miller:

Subject: Amendment- designate use over crops with tolerances
LG Permethrin Technical PH Insecticide
EPA Registration Number 71532-7
Your submission dated May 5, 2005

The 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) Delete "In No event shall LG Life Sciences, Ltd. or seller be liable for any incidental, consequential or special damages resulting from use or handling of this product." This statement is overly broad and implies buyer has no legal right to recover damages from manufacturer and is unacceptable under statutory and regulatory standards. we recommend revising it to read "To the fullest extent permitted by law LG Life Sciences, Ltd., Inc or Seller shall not be liable for any ... etc." or " It is LG Life Sciences, Ltd. intent that in no case shall LG Life Sciences, Ltd. or Seller be liable... etc."

3. Submit three (3) copies of your final printed labeling before you release the product for shipment.

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 Branch
Registration Division (7505C)

Enclosure

ACCEPTED
with COMMENTS
in EPA Letter Dated
JUL 27 2005

LG PERMETHRIN TECHNICAL PH INSECTICIDE

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
71532-7

AN INSECTICIDE FOR FORMULATING USE ONLY FOR FORMULATION OF MOSQUITO CONTROL PRODUCTS AND ULV MOSQUITO CONTROL AGENTS.

ACTIVE INGREDIENT:

*Permethrin.....	95.2%
OTHER INGREDIENTS:.....	4.8%
Total	100.0%

*(3-Phenoxyphenyl)methyl(±) cis,trans-3-(2,2dichloroethenyl)-
2,2-dimethylcyclopropanecarboxylate
cis/trans ratio: min. 35% (±) cis and max. 65% (±) trans.

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back Panel For Additional Precautions

Manufactured by:
LG Life Sciences, Ltd.
20 Yoido-dong
Youngdungpo-gu
Seoul, Korea

EPA Reg #71532-7
EPA Est. #71532-KOR-1

Net Contents: 110 lbs.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly after handling.

Environmental Hazards

This product is extremely toxic to fish. Keep out of lakes, streams, ponds, tidal marshes or estuaries. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other 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 Regional Office of the EPA.

Physical and Chemical Hazards

Do not use or store near heat or open flame.

First Aid

If Swallowed: Call a 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on Skin or Clothing: 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: 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.

User Safety Recommendations

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

Storage: Keep container closed when not in use. Do not store near food or feed. Protect from freezing. In case of spill or leak on floor or paved surfaces, soak up with sand, earth or synthetic absorbent. Remove to chemical waste area.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

Container Disposal: 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.

Formulators using this product are responsible for obtaining EPA registration for their formulated product which may be labeled for the use patterns as found listed on this label.

ONLY FOR FORMULATION INTO AN INSECTICIDE FOR THE FOLLOWING USES:
TERRESTRIAL NON-FOOD USE* AND DOMESTIC OUTDOORS.
FOR THE CONTROL OF MOSQUITOES, GNATS, BITING AND NON-BITING MIDGES, BLACKFLIES,
DEERFLIES AND OTHER BITING FLIES.

* EXCEPTION: This product may be used to formulate mosquito control products that are labeled for application over growing crops and range grasses that have established tolerances for permethrin.

~~Do not use this product to formulate products intended for Terrestrial Food Crops, Aquatic Uses, Greenhouse Uses, Forestry or Indoor Uses.~~

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying and using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of LG Life Sciences, Ltd. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold LG Life Sciences, Ltd. and Seller harmless for any claims relating to such factors.

LG Life Sciences, Ltd. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or LG Life Sciences, Ltd. and Buyer and User assume the risk of any such use. To the extent permitted by law, LG Life Sciences, Ltd. **MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

In no event shall LG Life Sciences, Ltd. or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF LG Life Sciences, Ltd. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF LG Life Sciences, Ltd. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

LG Life Sciences, Ltd. and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty of liability, which may not be modified except by written agreement signed by a duly authorized representative of LG Life Sciences, Ltd.