



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

March 2, 2004

Janice K. Sharp
Valent BioSciences Corporation
870 Technology Way
Libertyville, IL 60048

Subject: Label Amendment - Updating First Aid Statement per PR Notice 2001-1
Permanone Dusting Powder
EPA Reg. No. 73049-309
Your Submission Dated September 11, 2003


Dear Ms. Sharp:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Revise the Precautionary Statements as follows:
 - a. Replace "Wash thoroughly with soap and water after handling." with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."
 - b. Move second paragraph beginning "Do not apply product directly in/on eyes, mouth" and ending with "....consult a veterinarian immediately" to the Directions for Use, On Dogs section.
2. Re-instate "***cis/trans ratio: min. 35% (+) cis and max 65% (+) trans under the Ingredients Statement.

- 3. Replace "Not for Use in USDA Meat and Poultry Plants" with "Not for use in Federally Inspected Meat and Poultry Plants".
- 4. Following the heading Termites add in parenthesis (Localized Treatment). Also in same section delete the phrase "..... and to impart a temporary residual control of these places to termite attack which may aid in the prevention of immediate reinfestation of termites". This statement is not supported with data.
- 5. Following the last sentence under Bedbugs add: "Cover mattresses before use."
- 6. Revise Pesticide disposal to read "Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility."

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

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

PERMANONE® DUSTING POWDER

- RECOMMENDED FOR COMMERCIAL/AGRICULTURAL USE ONLY
- CONTAINS PERMANONE® AND BUTACIDE®
- PROVIDES QUICK KILLING ACTION AND RESIDUAL CONTROL OF FLEAS, AND TICKS ON DOGS FOR UP TO 14 DAYS.
- A BROAD SPECTRUM READY-TO-USE INSECTICIDE HIGHLY EFFECTIVE AGAINST ANTS, CARPENTER ANTS, BEES, 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 SIDE PANEL.
- ODORLESS, NON-STAINING FORMULATION

ACTIVE INGREDIENTS:

Piperonyl Butoxide* 2.0 %
 Permethrin** 0.5 %

OTHER INGREDIENTS: 97.5 %
 100.0 %

*Equivalent to 1.6% (butylcarbityl)(6-propylpiperonyl) ether and 0.4% related compounds.
 **Cis/trans ratio: max. 55% (+/-) cis and min. 45% (+/-) trans.

**ACCEPTED
 with COMMENTS
 In EPA Letter Dated
 MAR 2 2004**
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
73049-309

PRECAUCION AL CONSUMIDOR: Si usted no lee Ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.
(TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

EPA REG. NO. 73049-309

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • 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 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. • 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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of Medical emergencies or health and safety inquiries or in case of fire, leaking or damaged containers, information may be obtained by calling 1-877-315-9819.	

See Side Panel For Additional
 Precautionary Statements

NET CONTENTS:

4/16

**READ ENTIRE LABEL BEFORE EACH USE
PET USE APPLIES TO USE ONLY ON DOGS**

**PRECAUTIONARY STATEMENTS
Hazards To Humans & Domestic Animals**

CAUTION

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

Do not apply product directly in/on eyes, mouth or genitalia of animals. Do not use on dogs under 12 weeks. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing 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, consult a veterinarian immediately.

Environmental Hazards

This product is extremely toxic to fish and aquatic organisms. Do not apply directly to water. Drift and runoff from treated areas may be hazardous to aquatic organisms in treated areas. Do not contaminate water when disposing of equipment washwaters or rinsate. 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.

DIRECTIONS FOR USE

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

Do not apply this product in patient rooms or in any rooms while occupied by the elderly or infirm. Do not apply to classrooms when in use.

Permanone Dusting 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, stores, warehouses, hotels, industrial buildings, apartment buildings, mausoleums, laboratories, schools, non-patient areas of nursing homes and hospitals, and in nonfood areas of: restaurants, food manufacturing, processing and servicing establishments, and on: vessels, rail cars, aircraft (cargo areas only), buses, trucks and trailers.

Permanone Dusting Powder provides quick killing action and long lasting control of fleas and ticks on dogs.

Permanone Dusting 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; 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 Permanone® Dusting 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 Permanone Dusting Powder in combination with spray treatments of one of the liquid Permanone or Pyrenone® products currently available.

INDOOR USE

Cockroaches (Including Adult and Immature Stages of Both Non-resistant and Organophosphate and Carbamate Resistant Strains), Ants, Crickets, Silverfish and Firebrats: Apply thoroughly 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 around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and scatter powder freely on and around debris.

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 Permanone Dusting 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 Permanone Dusting 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 complete coverage of infested and vulnerable voids or galleries.

The purpose of such applications of this product is to kill workers or winged reproductive forms which may be present in the treated channels and spaces at the time of treatment and to impart a temporary residual control at these places to termite attack which may aid in the prevention of immediate reinfestation of termites. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but merely a supplement, particularly where use of other insecticides may pose an odor problem.

Brown Dog Ticks and Fleas IN BUILDINGS: Apply dust 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. Old bedding of pets should be removed and replaced with clean fresh bedding after treatment of pet areas.

Fleas and Ticks ON DOGS: Apply powder liberally over the entire body. Work dust into hair and around the feet, pads and between the toes by rubbing against the lay of the hair until dust penetrates to skin. Contact ticks with powder. Take care not to get the powder in animal's eyes, nose or mouth. Dust bedding, kennel, sleeping areas, carpeting and furniture used by infested animals regularly, applying at a rate of 3 to 6 ounces per 100 square feet. Repeat application every one to two weeks, if necessary.

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.

Sowbugs, Pillbugs, Ground Beetles, Earwigs, Millipedes, Centipedes and Scorpions: 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.

Wasps and Bees: It is generally advisable to treat wasp and bee 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 check nests carefully one or two days after treatment to ensure complete 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 - Grain Beetles (Rusty, Merchant and Sawtoothed), Flour Beetles (Red and Confused), Drugstore Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths: Treat exposed stages. Apply dust at a rate of 3 to 6 ounces per 100 square feet in cracks and crevices behind and under cupboards and cabinets for residual control. Do not apply directly on food, utensils or food 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.

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 HANDLING ESTABLISHMENTS - Places other than private residences in which food is held, processed, prepared or served.

NON-FOOD AREAS: Permanone Dusting Powder may be used as a crack and crevice treatment or as a spot application in non-food areas. All areas where insects hide or through which insects may enter should be treated.

Not for Use in USDA Meat and Poultry Plants.

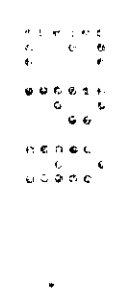
Do not use in the food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

OUTDOOR USE

PERIMETER TREATMENT: Use Permanone Dusting 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. Apply thoroughly and uniformly to the band area. Pay particular attention to anthills and wasp nests in the band area.

Wasp and Bee nests in trees and shrubs: It is generally advisable to treat wasp and bee 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.

For best results check nests carefully one or two days after treatment to ensure complete 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.

Cockroaches IN SEWERS: Apply 6 oz. of Permanone Dusting Powder per manhole using a power duster for knockdown and short-term population suppression. Where longer residual control (30 days) is desired, apply 10 oz. of Permanone Dusting Powder per manhole.

STORAGE AND DISPOSAL

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

Pesticide Storage And Spill Procedures: Store upright at room temperature. Keep away from moisture. Sweep up and dispose of with chemical waste.

Pesticide Disposal: Pesticide that cannot be used according to label instructions ~~must~~ may be disposed of on site or by an approved waste disposal facility.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose in same manner.

CONTAINERS ONE POUND AND SMALLER: **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.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Valent BioSciences Corporation. All such risks shall be assumed by the user or buyer.

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List No. 73049309

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