



74843-1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OCT 2 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Buzz Off Insect Shield, LLC
c/o Ms. Elizabeth Anne Brown
ChemReg International, LLC
1990 Old Bridge Road, Suite 201
Lake Ridge, VA 22192

- Subject: I. Amendment to Comply with the Agency's Email of June 30, 2003
Buzz Off Insect Shield Concentrate
EPA Reg. No.: 74843-1
Your Submission Dated July 9, 2003
- II. Label Concern Raised by a State Official
Buzz Off Insect Shield Apparel
EPA Reg. No.: 74843-2

Dear Ms. Brown:

I. Amendment to Comply with the Agency's Email of June 30, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the label is enclosed for your records. Please correct the following typographical error in the final printed label before you release the product for shipment:

- Delete the extraneous period (".") between the last two sentences of the "Application Procedure" paragraph.

II. Label Concern Raised by a State Official

Recently, a State official raised a concern about the lack of a general misuse statement ("It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.") on the Buzz Off Insect Shield Apparel label. After reconsideration, we have concluded that the label should include the general misuse statement as required by the regulations at 40 CFR §156.10 for all pesticide products. Accordingly, you must add this statement to the "Hang Tag" label at the next label printing. It is not necessary to include this statement on the garment label due to its small size.

If you have any questions regarding these actions, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,



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

Enclosure

BUZZ OFF INSECT SHIELD CONCENTRATE
INDUSTRIAL TREATMENT FOR MANUFACTURE/FORMULATION OF
END-USE PESTICIDES:
APPAREL AND CONSTRUCTED FABRICS ONLY

EPA Reg. No. 74843-1

EPA Est. No. 74843-NC-001

ACTIVE INGREDIENT:

Permethrin*	40.00%
INERT INGREDIENTS**	60.00%
TOTAL	100.00%

*(3-phenoxyphenyl) methyl (+)cis-trans-3-(2,2-dichloroethenyl)-2,2-dimethyl-cyclopropanecarboxylate; cis/trans isomers ratio: min 35% (+)cis and max 65% (+)trans

** Contains petroleum distillates

NET CONTENTS: 30 gallons (114 liters)

DANGER
KEEP OUT OF REACH OF CHILDREN

FIRST AID: Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
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
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
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL 1-800-222-1222	
NOTE TO PHYSICIAN: This product contains a pyrethroid and a petroleum solvent. The possibility of aspiration pneumonia must be considered. The product can cause severe eye damage; ophthalmology consultation recommended. Probable mucosal damage may contraindicate the use of gastric lavage.	

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

Produced and Packaged For:

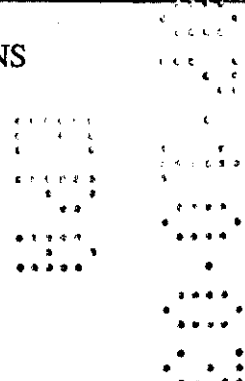
BUZZ OFF INSECT SHIELD
701 GREEN VALLEY ROAD, SUITE 302
GREENSBORO, NORTH CAROLINA 27408

ACCEPTED
with COMMENTS
In EPA Letter Dated:

OCT 2 2003

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

74843-1



PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. Harmful if swallowed. Avoid contact with skin. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and other aquatic organisms. 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.

DIRECTIONS FOR USE

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

Only for formulation into an insecticide for the following uses: Treated outer apparel and constructed fabric products (such as, netting, tents, shelters, awnings, truck covers, hunting blinds, backpacks, sleeping bag shells) to repel mosquitoes, ticks, ants, fleas, flies, spiders, and other flying and crawling insects. For use on outer apparel and constructed fabrics (tents, awnings, nettings, etc) only. DO NOT APPLY TO UNDERWEAR.

Application Procedure: Apply to outer apparel and constructed fabrics at the rate of 1.3% by weight of garment of Buzz Off Insect Shield Concentrate using the Buzz Off Insect Shield Process. Use goggles or face shield and protective gloves when handling in-process items. Do not exceed an application rate equivalent to 1.25 grams of active ingredient per square meter of fabric.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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 instruction, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at 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 approved state and local procedures.