

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JAN 8 2010

Mrs. Elizabeth Anne Brown, Ph.D. Steptoe & Johnson, LLP Authorized Agent 1330 Connecticut Avenue NW Washington, DC 20036-1795

RE: Notification of Alternate Brand Name: "Insect Shield Concentrate 14D"

EPA Registration Number: 74843-3 Date of Submission: October 29, 2009

Dear Dr. Brown:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, October 29, 2009, for the above mentioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader Registration Division (7505P) Office of Pesticide Programs

Please read instructions on revers	Fo			0, Approval expires 5-31-98			
	Unit	ed States		Registrati		OPP Identifier Number	
<b>♦EPA</b>	Environmental	Protection Ag	jency	Amendme	ent		
	Washing	ton, DC 20460		X Other			
Application for Pesticide – Section I							
Company/Product Number     74843-3			EPA Product M     George LaRocca	lanager	3. Propos	ed Classification	
Company/Product (Name)     Buzz Off Insect Shield Concent	strate 14D		PM#		X Non	e Restricted	
5. Name and Address of Appli			6. Expedited Review. In accordance with FIFRA Section 3(c)(3)				
Insect Shield, LLC P.O. Box 10129			(b)(i), my product is similar or identical in composition and labeling to:				
Greensboro, NC 27404			EPA Reg No.				
Check if this Is a new address			Product Name				
		Secti	on - II				
Amendment - Explain be	elow	W. H		d labels in respon	se to		
Resubmission in response to Agency letter dated			Agency letter dated "Me Too" Application NOTIFICATION				
X Notification – Explain below JAN – 8 2010					010		
Explanation: Use additional r	page(s) if necessary. (Fo	r Section I and Sec	ction II.)				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)  Notification of Labeling Change (Alternate Brand Name) per PR Notice 98-10, Section II A							
This notification is consistent w	ith the provisions of PR	Notice 98-10 and F	PA regulations at 40	CER 152 46 and	l no other c	hannes have heen made	
to the labeling or the confident	ial statement of formula o	of this product. I ur	nderstand that it is a	violation of 18 U.S	C. Sec. 10	01 to willfully make any	
false statement to EPA. I furth product may be in violation of f							
		Soot	ion III				
Material This Product Will b	e Packaged in:	3600	IOR III				
Child-Resistant Packaging	Unit Packaging	Wa	iter Soluble Packagir	ng		of Container	
Yes	Yes X No	x	Yes No			tal – epoxy lined stic	
X No	If "Yes"		Yes"	No. per	Gla		
*Certification must be submitted	Unit Packaging wgt.	1	ckage wgt	container		ner (Specify)	
Location of Net Contents In	formation	4. Size(s) Retail	Container	15 10	ration of lab	el directions	
X Label	Container	30, 55 gallon	Container	[ ] (	On Label		
6. Manner in Which Label is A	ffixed to Product	Lithograph		Other	On Label ac	companying product	
O. Waliner in Winch Laber is A	illived for Loddor	X Paper glue		Other			
Stenciled Stenciled							
Section IV  1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)							
Name	_			clude Area Code)			
Elizabeth Anne Brown		Authorized	Johnson, LLP agent	202-4	19-5166		
Certification			rata ara trua acaura	te and complete	6.	Date Application Received	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.  I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law							
2. Signature		3. Title	· ·			(Stamped)	
Heijasich ane Br	1 '	Authorized agent			0000 0 0000		
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Typed Name     Elizabeth Anne Brown		5. Date	2000		ودودادر	رو ر. د د ر ر	
Firsquetti Villie Dinmit		October 29	, 2003		, , ,		
					((),	`	

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

White - EPA File Copy (Original) Yellow - Applicant Copy

WRITER'S DIRECT DIAL 202.419.5166

1330 Connecticut Avenue, NW Washington, DC 20036-1795 Tel 202.429.3000 Fax 202.429.3902 steptoe.com

October 29, 2009

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Attention:

Ms. Joyce Edwards (PM Team 13)

Subject:

BUZZ OFF Insect Shield Concentrate 14D, EPA Reg. No. 74843-3

Notification of Alternate Brand Name per PR 98-10

Dear Joyce:

On behalf of our client, Insect Shield, LLC, enclosed please find a notification for Buzz Off Insect Shield Concentrate 14D (EPA Reg. No. 74843-3) to add an alternate brand name, "Insect Shield Concentrate 14D." Enclosed with this application, please find EPA Form 8750-1 and a copy of the label with changes highlighted. This notification is consistent with PR 98-10.

Sincerely,

Hijawel dree Brown

Elizabeth Anne Brown, Ph.D. Technical and Regulatory Analyst eabrown@steptoe.com

cc:

Insect Shield, LLC

# INSECT SHIELD CONCENTRATE-14D

INDUSTRIAL TREATMENT FOR MANUFACTURE/FORMULATION OF END-USE PESTICIDES:

#### APPAREL AND CONSTRUCTED FABRICS ONLY

<b>EPA</b>	Reg.	No.	74843-3
			, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,

NOTIFICATION

EPA Est. No.

Lot No.

IAN - 8 2010

ACTIVE INGREDIENT:

\*(3-phenoxyphenyl) methyl (±)cis-trans-3-(2,2-dichloroethenyl)-2,2-dimethyl-cyclopropanecarboxylate; cis/trans isomers ratio: max 55% (±)cis and min 45% (±)trans

\*\* Contains petroleum distillates

**NET CONTENTS:** 

# KEEP OUT OF REACH OF CHILDREN

## **DANGER**

FIRST AID:			
Have the product co treatment.	ontainer or label with you when calling a poison control center or doctor, or going for		
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		
IF	Immediately call a poison control center or doctor		
SWALLOWED	Do not induct 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; opthalmology consultation recommended. Probable mucosal damage may contraindicate the use of gastric lavage.

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

Produced and Packaged For:

INSECT SHIELD P.O. Box 10129

GREENSBORO, NORTH CAROLINA 27404

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#### 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

Combustible. 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 requirments 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 1.48% by weight of garment of Insect Shield Concentrate 14D using the 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. Nonrefillable container. Do not use or refill this container.

**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 cccc guidance.

CONTAINER DISPOSAL: Triple rinse (or equivalent) then offer for recycling of reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

Nontication 10/29/2009, page 3

#### 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 Insect Shield, LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: INSECT SHIELD, LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Insect Shield, LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent permitted by law Insect Shield, LLC shall not be liable for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT INSECT SHIELD, LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

[ESL: 08-16-2004]