

74843-4

1-25-2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

January 25, 2008

Elizabeth Anne Brown, Ph.D.
Authorized Agent for
BUZZ OFF Insect Shield Insect Concentrate
Steptoe & Johnson, LLP
1330 Connecticut Ave., NW
Washington, DC 20036-1795

NOTIFICATION

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Dr. Brown:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated December 14, 2007, for:

EPA Registration 74843-3
EPA Registration 74843-4

BUZZ OFF Insect Shield Insect Concentrate 14D
BUZZ OFF Insect Shield Insect Concentrate 15D

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identify the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Nicole Williams of my staff at 703-308-5551.

Sincerely,

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

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STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

WRITER'S DIRECT DIAL
202.419.5166

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

December 27, 2007

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: George LaRocca (PM 13)

Subject: BUZZ OFF Insect Shield Insect Concentrate 15D, EPA Reg. No. 74843-4
Notification of Labeling Changes per PR Notice 2007-4

Dear George:

On behalf of our client, Buzz Off Insect Shield, LLC, enclosed please find a notification for Buzz Off Insect Shield Concentrate 15D (EPA Reg. No. 74843-4) to add statements required by PR Notice 2007-4. Enclosed with this application, please find EPA Form 8570-1 and a copy of the label with changes highlighted.

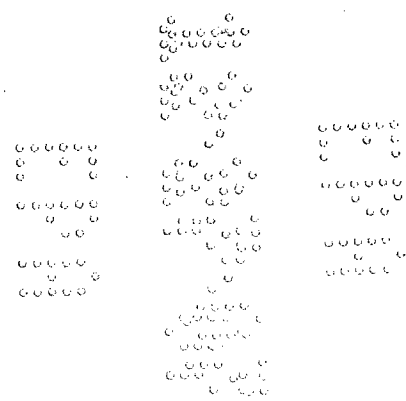
Please contact me immediately if there are any questions.

Sincerely,

Elizabeth Anne Brown

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

cc: Buzz Off Insect Shield, LLC



Please read instructions on reverse before completing form

Form Approved, OMB No. 2070-0060, Approval expires 5-31-98



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 74843-4	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Buzz Off Insect Shield Concentrate 15D	PM # 13	
5. Name and Address of Applicant (Include ZIP Code) Buzz Off Insect Shield, LLC 814 West Market Street Greensboro, NC 27401 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION EPA Reg No. Product Name JAN 25 2008	

Section - II

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of Label Change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material This Product Will be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal - epoxy lined	
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 30, 55 gallon		5. Location of label directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product			<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	<input type="checkbox"/> Other _____	

Section IV

1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Elizabeth Anne Brown		Title Steptoe & Johnson, LLP Authorized agent		Telephone No. (Include Area Code) 202-419-5166	
Certification 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.				6. Date Application Received (Stamped)	
2. Signature <i>Elizabeth Anne Brown</i>		3. Title Steptoe & Johnson, LLP Authorized agent			
4. Typed Name Elizabeth Anne Brown		5. Date Dec 27, 2007			

BUZZ OFF INSECT SHIELD CONCENTRATE 15D
INDUSTRIAL TREATMENT FOR MANUFACTURE/FORMULATION OF
END-USE PESTICIDES:
APPAREL AND CONSTRUCTED FABRICS ONLY

EPA Reg. No. 74843-4

EPA Est. No.
Lot No.

ACTIVE INGREDIENT:

Permethrin*	35.00%
INERT INGREDIENTS**	65.00%
TOTAL	100.00%

*(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 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

P.O. Box 10129

GREENSBORO, NORTH CAROLINA 27404

NOTIFICATION

JAN 25 2008

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 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 1.48% by weight of garment of Buzz Off Insect Shield Concentrate 15D using the Buzz Off Insect Shield Process. Use goggles or face shield and protective gloves when handling in-process items.

STORAGE AND DISPOSAL

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

Nonrefillable container. Do not reuse 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 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.

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

DISCLAIMER OF WARRANTIES: BUZZ OFF 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 Buzz Off 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 Buzz Off 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 BUZZ OFF INSECT SHIELD, LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

ESL: 8/16/2005

