

82392-1

01/10/2007

116



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 10 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Henry Jacoby
6709 Ilex Court
New Market, MD 21774

Subject: Label Amendment – Add Additional Sites

EPA Registration No. 82392-1
Perimeter Insect Guard, Insect Repellent Fabric, Tenting, Netting, and Apparel
Your submissions dated June 5, 2006 & September 15, 2006

Dear Mr. Jacoby:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 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.

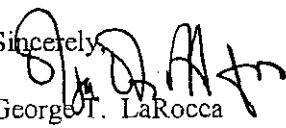
1. Delete hang-tag placed outside of treated article for items other than apparel. Use of hand tag placed outside the treated apparel was permitted due to the nature of the article i.e., clothing that is worn. For items other than clothing the complete label must be affixed to the gear or item that is treated i.e., tents, shelters, truck covers, awnings, etc. If there is an overwrap over the gear or item then the full label must also appear on the outside of the packaging.
2. Replace "fabric" with "gear" on the front panel. The term fabric is too generic a term.
3. Replace the repellency duration claims as follows:
 - a. Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washables items i.e. tents, shelters, truck covers, awnings, hunting blinds, kennel/stall coverings.
 - b. Repellency remains effective for 25 washings for washable items i.e., outer wear garments, apparel, pet bedding, blankets, netting.
4. Revise the first sentence of the disposal statements to read "Discard *clothing and other treated articles when worn out.*"
5. Change "Treated article label to be sewn into..." to read "Treated garment label to be sewn into a seam of treated garment." Also change "article designation" to "garment designation."

- 6. Delete "Also for use in/on fabrics for carpeting as a repellent against dust mites." We do not have data from impregnation to support this claim.
- 7. You have indicated that the additional articles will be treated after construction, similar to how apparel is treated. If not, then the establishment that performs the final construction of the article is considered a pesticide manufacturer. Such establishments must either obtain their own registrations or be under contract with the basic registrant to manufacture the final treated articles.
- 8. Delete one of the entries for "ants" in the 2nd bullet of the front panel. Also delete "and other flying and crawling insects" on pages 1 and 3 of the label.

The CSF refers to apparel fabric only. Since other articles are being constructed from the permethrin treated cloth, the CSF should be revised to reflect this change.

Please note that a notice of availability of EPA's reregistration eligibility document (RED) for products containing permethrin was published in the FR on June 28, 2006 (Vol 71 no. 124 pg. 36788). Additional data and/or labeling changes may be required for products containing permethrin.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,

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

Enclosure

Draft new use label
4-24-2006

Hang-tag placed outside of [treated article*] (removable by consumer)
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

PERIMETER INSECT GUARD

INSECT REPELLANT FABRIC, TENTING, NETTING, AND APPAREL*

- THIS ARTICLE HAS BEEN TREATED WITH PERMANONE (PERMETHRIN) INSECT REPELLENT
- REPELS MOSQUITOES, TICKS, ANTS, SPIDERS, FLEAS, FLIES, CHIGGERS, MIDGES, ANTS, AND OTHER FLYING AND CRAWLING INSECTS. >
- DRYCLEANING REMOVES ACTIVE INGREDIENT. DO NOT DRYCLEAN.
- REPELLENCY REMAINS EFFECTIVE FOR 25 WASHINGS
- DO NOT RE-TREAT ARTICLE WITH OTHER PERMETHRIN INSECT REPELLANT PRODUCTS.
- FOR PROTECTION OF EXPOSED SKIN, USE IN CONJUNCTION WITH AN INSECT REPELLENT REGISTERED FOR DIRECT SKIN APPLICATION.
- WASH TREATED ARTICLE SEPARATELY FROM OTHER ARTICLES OR CLOTHING.

EPA Reg. No. 82392-1
EPA Est. No. 82392-MS-1

ACCEPTED
with COMMENTS
in EPA Letter Dated
JAN 10 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
82392-1

Active Ingredient	
Permethrin.....	0.52%
Other Ingredients*.....	99.48%
*(identify the treated article)	100.00%

Manufactured by PineBelt Processing, Inc.
Stonewall, MS 39636

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal
Disposal: Discard in trash when clothing is worn out. Do not reuse clothing for other purposes than as a garment.

Draft new use label
4-24-2006

Treated article label to be sewn into a seam of treated article – 2 7/8" x 3 1/4" as care label material

PERIMETER INSECT GUARD

Insect Repellant Treated (see attachment)

• Refer to tag for more information.

(article designation will go here)

PERMETHRIN CONTRACT No.: (only for military contract)
PINEBELT PROCESSING, INC.
PERIMETER INSECT GUARD
EPA REG. NO. 82392-1
EPA EST. NO. 82392-MS-

-----fold line-----

- Do Not Dry Clean, Dry Cleaning removes active ingredient.
- Wash separately from other clothing.
- Do Not Re-treat with a permethrin product.
- Dispose of garment in trash.

Repels mosquitoes, ticks, ants, flies, chiggers, and midges.

Repellancy remains effective for 23 washings

ACTIVE INGREDIENT:	%W/W
Permethrin.....	0.52%
OTHER INGREDIENTS: (GARMENT).....	99.48%
TOTAL.....	100.00%

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

Retain hangtag for future reference on proper handling of this garment

Draft new use label
4-24-2006

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS TREATED ARTICLE. THIS TAG IS NOT TO BE REMOVED EXCEPT BY CONSUMER.

* Because of the different markets, the label will reflect the type of article treated. That is "Insect repellent horse blanket" or "Insect repellent garment" or "Insect repellent tent."

Treating articles may be the following: tents, shelters, truck covers, awnings, hunting blinds and netting; outer wear garments or field clothing (i.e., coats, jackets, coveralls, gaiters, chaps, hat bands, bibs and vests; and domestic animal [dogs, cats, horses] care products (such as pet bedding, blankets, rugs, netting and kennel/stall coverings) as a repellent against ticks, mosquitoes, spiders, ants, fleas, flies and other flying and crawling insects; Also for use in/on fabrics for carpeting as a repellent against dust mites.

Carton label
4-24-2006

6/6

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

PERIMETER INSECT GUARD

Insect Treated (type of article goes here)

EPA Reg. No. 82392-1
EPA Est. No. 82392-MS-

Active Ingredient	
Permethrin.....	0.52%
Other Ingredients (Garment).....	<u>99.48%</u>
	100.00%

Manufactured by PineBelt Processing, Inc.
Stonewall, MS 39636

STORAGE AND DISPOSAL

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

Disposal: Discard in trash when clothing is worn out. Do not reuse clothing for other purposes than as a garment.

See label on Individual Garment for Additional Information

Net Contents: (x) treated (*type of article goes here*)