

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

JUL 10 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Deb Anderson
International Textile Group, Inc.
804 Green Valley Road, Suite 300
Greensboro, NC 27408

Subject: Label Amendment to Add Use on Gear Articles

EPA Registration No. 83588-1
No FLY Zone

Your submissions dated December 13, 2007 and April 11, 2008


Dear Ms Anderson:

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 "*long lasting*" from the marketing claims. Marketing claims that imply protection will extend for an indefinite period are not acceptable.
2. Either delete the sentence beginning, "*Neither manufacturer of No Fly Zone garment nor gear...etc.*" or revise to read, "*International Textile Group Inc. cannot guarantee complete protection from insects, insect's bites...*"
3. The following sites of application have not been previously assessed in conjunction with fabric/garments impregnated with permethrin and must be deleted: "*logos, patches, duffle bags, pouches, protective covers (unqualified), washable protective covers (unqualified), military gear (unqualified), other shelter applications (unqualified), protective and military gear (unqualified), insect screens, litters, gurneys, camping gear (unqualified) protective drapes, floor coverings (this is for dust mites), barrier materials, and protective seating.*"
4. Change "*sleeping bags*" to "*sleeping bag covers*" and "*outdoor furniture fabrics*" to "*outdoor furniture covers*". Qualify domestic animal care products by adding in parenthesis "(pet beddings, blankets)".

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

Enclosure

**Master Registration Label/Hang Tag Draft
Name of Product Brand: No Fly Zone™
Garments/Gear That Repels Insects**

EPA Registration No: 83588-1

Establishment No:

- **The fabric in this garment has been treated with the active ingredient Permethrin.**
- **Permethrin in this garment or gear is bound to the fabric and remains effective for 25 washings, for washable garments. Including: sleeping bags, covers, backpacks, bed netting, long lasting, insecticide netting, tent netting, logos, patches, duffle bags, pouches, protective covers, domestic animal care products, pet bedding, blankets and washable protective covers, shoes and socks. Other items will include military gear, tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers, other shelter applications, protective gear, and military gear, insect screens, awnings, cots, litters, gurneys, tarps and camping gear, protective drapes, floor coverings, and barrier materials, protective seating, outdoor furniture fabrics.**
- **Permethrin repels mosquitoes, ants, ticks, chiggers, flies and midges.**
- **Wash this and other No Fly Zone™ treated garments together.**
- **Wash separately from other textiles.**
- **DO NOT DRY CLEAN GARMENT (dry cleaning removes the Permethrin active ingredient)**
- **Storage and Disposal**
 - **Do not contaminate water, food or feed by storage or disposal.**
 - **Disposal: discard in trash when garment /gear is worn out.**
 - **Do not reuse gear for purposes other than originally intended.**

Neither manufacturer of No Fly Zone™ garment nor gear nor any other insect repellent product can guarantee complete protection from insects, insect bites, or related diseases or reactions.

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

Active Ingredient:	% by weight
Permethrin	0.52%
Inactive Ingredient: Garment/Gear	99.48%

Total	100.00%

Manufactured by International Textile Group, Inc., Greensboro, North Carolina USA.

Hang Tag must not be removed, except by consumer, after purchase.

Keep this hangtag for future reference on how to properly handle this garment.

ACCEPTED
with **COMMENTS**
In EPA Letter Dated
JUL 10 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
83588-1



NO FLY ZONE™

Gear that repels insects

Contains
Permethrin (0.52%)
that repels mosquitoes,
ants, ticks, chiggers,
flies and midges.

Active ingredient remains
effective for 25 washings.

DO NOT DRY CLEAN

Wash garments separately
from other textiles.
Dispose of worn out
garment in trash.

EPA Reg. No. 83588-1
EPA Est. No. 82689

Refer to hangtag for
detailed information.

**THIS TAG MUST NOT
BE REMOVED**