

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. Micah T. Reynolds Technology Science Group Inc. 1150 18th Street, Suite 1000 Washington, DC 20036:

SEP 12 2013

Subject: Label Notification(s) for Pesticide Registration Notice 98-10

Dear Mr. Reynolds:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated September 5, 2013 for the following product(s):

"NFZ"

Alternate Brand Name

"Vamoose"

"Amigo Bug Buster"

"Rambo Fly Buster"

The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

No Fly Zone™

EPA Reg. No. 83588-1

If you have any questions, please contact Linda A. DeLuise at 703-305-5428.

Sincerely,

Richard J. Gebken Product Manager Insecticide Branch

Registration Division (7504P)

Please read instructions on re-	verse side before completing	g form.		Form	Approved	I. OMB	No. 2070-0	060. Approval expires 05-31-98	
≎EPA	Washington, DC 20				Registration Amendment Other			OPP Identifier Number	
		Applicat	ion for F	Pesticide - Sec					
1. Company/Product Number 83588-1				2. EPA Product Manager Richard Gebken			٠ L.	3. Proposed Classification	
4. Company/Product (Name) No Fly Zone TM				PM# None Restricted					
5. Name And Address Of Applicant (Include ZIP Code) International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 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 SEP 1 2 2013					
			Sec	ction II					
Amendment – Explain below. Resubmission in response to Agency letter dated August Notification – Explain below.				Final Printed labels in response to					
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of Label Notification to add Alternate Brand Names, optional marketing statements, and logo to the product master label. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of 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 this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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. Please confirm receipt with Micah Revnolds: mrevnolds@tsqusa.com. via phone (202) 828-8967. or via fax (202) 872-0745. Section III									
1. Material This Product W	ill Be Packaged In:								
Child Resistant Packaging Yes* No * Certification must	uging Unit Packaging Yes No			Water Soluble Packaging Yes No If "Yes" No. per			2. Type of Container Metal Plastic Glass		
be submitted	Unit Packaging wgt.	Container	Unit Pa	ackaging wgt. Co	ntainer		Paper ✓ Other	(Specify) treated fabric	
3. Location of Net Contents	Information ontainer		Size(S) Retail Container Impregnated/Treated Fabric			Directions			
6. Manner in Which Label is Affixed to Product Lithogra Pager g Stencile			lued Other Hallg rag						
			Sec	tion IV				E C	
1. Contact Point (Complete	items directly below for	identification			necessarv	, to pro	cess this an	oplication.) Cocci	
Name Micah T. Reynolds, Technology Sciences Group, Inc.			Title Telephot				é No. (Incluse Area Code)		
Certificati I certify that the statements I have made on this form and I acknowledge that any knowingly false or misleading sta both under applicable law.				nd all attachments thereto are true, accurate and complete.					
2. Signature Missell Rau			3. Title Regulatory Consultant to International Textile Group, Inc.						
4. Typed Name Micah T. Reynolds			5. Date September 5, 2013						



Technology Sciences Group Inc.

1150 18th Street, Suite 1000 Washington, DC 20036 Direct: (202) 828-8967 Fax: (202) 872-0745

E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds Senior Regulatory Consultant

September 5, 2013

International Textile Group, Inc. **Submission of Label Notification for** No Fly Zone; EPA Reg. No. 83588-1

Mr. Richard Gebken (PM-10) Insecticide Branch/Registration Division (NOTIF) Office of Pesticide Programs (7505P) U.S. Environmental Protection Agency **Document Processing Center** Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202

Dear Mr. Gebken:

Technology Sciences Group, Inc., on behalf of International Textile Group, Inc. (ITG), is submitting the enclosed label notification to add several alternate brand names. "NFZ". "Vamoose", "Amigo Bug Buster", and "Rambo Fly Buster", to the above-referenced product label. A customer seeking to make horse products intends to use one or more of the new alternate brand names. Further, select optional marketing statements have been added that a new customer wishes to use; all are consistent with statements and claims already approved in the master label. Lastly, a new product name logo has been added that ITG may utilize in the future. Note that this notification submission is being made in response to the Agency's August 15, 2013 letter denying the previously submitted label notification for this product. Please find enclosed the following documents supporting this notification:

- 1) EPA Notification Form (EPA Form 8570-1);
- 2) One copy of the revised label with changes highlighted;
- 3) Three clean copies of the revised label.

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely.

Regulatory Consultant to

International Textile Group, Inc.

CC: M. Garlick (ITG); D. Beusse (ITG); N. Bebo (ITG); R. Robinson (ITG)

No Fly Zone™

(MASTER LABEL)

Sublabel A: Permethrin-Treated Fabric uses for Garments

Sublabel B: Permethrin-Treated Fabric uses for Gear

Sublabel C: Permethrin-Treated Fabric uses for Dog & Horse

Products/Gear

Sublabel D: Affixed Tag/Label - ALL Garments, Gear, or Dog/Horse

Products

Optional Label Claims

EPA Reg. No.: 83588-1

EPA Establishment No.: TBD

Manufactured [by] [for]:

International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA

NOTIFICATION

SEP 1 2 2013



(SUBLABEL A: MASTER LABEL - GARMENT)

(Note to Reviewer: the following garments may be made from No Fly ZoneTM fabric: men's and women's shirts, pants, shorts, cargo shorts, hats, jackets, pullovers, scarves, bandanas, socks, shoe coverings, and vests. Their names may be used in place of the word "garment" in the text of the marketplace label.)



(Alternate Brand Names: Mity-Tex, Mity Tex, Insect Defense System, NFZ)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]: International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin	0.52%
Other Ingredient (Garment)	<u>99.48%</u>
TOTAL	

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

- The fabric in this [garment] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [garment] is bound to the fabric and remains effective for 70 washings [for washable garments].
- For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Cocc Hangtag must not be removed, except by consumer after purchase. Keep this that get ag for future reference on how to properly handle this [garment]. DO NOT DRY CLEAN [GARMENT] (dry coccaning removes the Permethrin active ingredient). DO NOT ADD OTHER PERMETHRING INSECT REPELLENT PRODUCTS TO THIS [GARMENT].

International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [garment] is worn out.
- Do not use or reuse [garment] for purposes other than originally intended.

(SUBLABEL B: MASTER LABEL - GEAR)

(Note to Reviewer: the following gear articles may be made from No Fly Zone™ fabric: tents, tent mesh, tent netting, tent liner, umbrella, bivouac sack, bivy sack, bivvy bag, bivi bag, bivi, sleeping bag covers, backpacks, tarps, tent ground cloths, outdoor furniture covers, outdoor furniture cushion covers, camping chairs, patio umbrella covers. Their names may be used in place of the word "gear" in the text of the marketplace label.)



(Alternate Brand Names: Mity-Tex, Mity Tex, Insect Defense System, NFZ)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]: International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin	0.52%
Other Ingredient (Gear fabric)	<u>99.48%</u>
TOTAL	100.00%

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

- The fabric in this [gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [gear] is bound to the fabric and remains effective for 70 washings [for washable gear].
- For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [gear]. DO NOT DRY CLEAN [GEAR] (dry cleaning consumer after purchase. Keep this hangtag for future reference on how to properly handle this [gear]. DO NOT DRY CLEAN [GEAR] (dry cleaning consumer after purchase. Keep this handle for future reference on how to properly handle this [gear]. DO NOT DRY CLEAN [GEAR] (dry cleaning consumer after purchase. Keep this handle for future reference on how to properly handle this [gear]. DO NOT DRY CLEAN [GEAR] (dry cleaning consumer after purchase. Keep this handle for future reference on how to properly handle this [gear]. DO NOT DRY CLEAN [GEAR] (dry cleaning consumer after purchase. Keep this handle for future reference on how to properly handle this [gear]. DO NOT DRY CLEAN [GEAR] (dry cleaning consumer after purchase.)

International Textile Group, Inc. cannot guarantee complete protection from insects insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [gear] is worn out.
- Do not use or reuse [gear] for purposes other than originally intended.

(SUBLABEL C: MASTER LABEL – DOG & HORSE PRODUCTS/GEAR)

(Note to Reviewer: the following dog/horse products/gear may be made from No Fly ZoneTM fabric: dog bedding, kennel covers, horse blankets, stall covers, dog shirts, dog hats, dog bandanas, dog collars, garment(s). Their names may be used in place of the word "dog/horse product/gear" in the text of the marketplace label.)



(Alternate Brand Names: Mity-Tex, Mity Tex, Insect Defense System, NFZ, Vamoose, Rambo Fly Buster, Amigo Bug Buster)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]: International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin	0.52%
Other Ingredient [(Dog/Horse Product/G	Gear)]. <u>99.48%</u>
TOTAL	100.00%

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

- The fabric in this [dog/horse product/gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [dog/horse product/gear] is bound to the fabric and remains effective for 70 washings [for washable dog/horse products/gear].

Directions for Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Law to use this product in a manner inconsistent with its labeling. Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [dog/horse product/gear]. DO NOT DRY CLEAN [dog/product/gear]. OTHER PERMETHRIN INSECT REPELLENT PRODUCTS TO THIS [dog/horse-product/gear].

International Textile Group, Inc. cannot guarantee complete protection free ກໍ່insects, insect bites, related diseases or reactions.

STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [dog/horse product/gear] is worn out.
- Do not use or reuse [dog/horse product/gear] for purposes other than originally intended.

(SUBLABEL D: MASTER LABEL – AFFIXED GARMENT, GEAR, or DOG/HORSE PRODUCT/GEAR TAG)

No Fly Zone™

(Alternate Brand Names: Mity-Tex, Mity Tex, Insect Defense System, NFZ, Vamoose, Rambo Fly Buster, Amigo Fly Buster)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Contains Permethrin (0.52%) that repels mosquitoes, ants, ticks, chiggers, flies and midges. Active ingredient remains effective for 70 washings [for washable gear] [for washable garments] [for washable dog/horse products/gear].

Do Not Dry Clean.

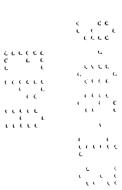
Dispose of worn out [gear] [garment] [dog/horse product/gear] in trash.

EPA Reg. No. 83588-1

EPA Est. No.

Refer to hangtag for detailed information.

THIS TAG MUST NOT BE REMOVED.



Optional Label Claims and Marketing Statements for Garment, Gear, or Dog/Horse Product/Gear Hang Tags AND/OR Tag affixed to Garment, Gear Article, or Dog/Horse Product:

- Apparel that repels insects
- Garments that repel insects
- Garment that repels insects
- Gear that repels insects
- Insect repellent clothing
- Insect repellent apparel
- Insect repellent gear
- Clothing that repels insects
- Insect repellent protection [in a] [clothing] [garment] [jacket] [shirt] [pair of pants] [pair of shorts] [hat]
- Repels mosquitoes
- Repels ticks
- Built-in insect repellent technology [that lasts through 70 washes]
- Insect Defense System
- Insect Defense
- [Tents] [Tent mesh] [Tent liner] [Umbrella] [Bivouac sack] [Bivy Sack] [Bivvy Bag] [Bivi Bag] [Bivy] [Sleeping bag cover] [Backpack] [Outdoor furniture] that repels insects
- No-Fly Zone™ Technology converts [gear] [garments] into long-lasting effective and convenient insect protection.
- Proven to repel mosquitoes, ants, ticks, chiggers, flies and midges.
- Treated with the active ingredient Permethrin for [long-lasting] [effective] fly, mosquitto, ant, tick, chigger, and midge protection.
- No-Fly Zone™ remains effective for 70 washings.
- Fly protection for a calm and happy horse

- Odorless [and] Invisible [Protection]
- © 2010 International Textile Group, Inc. No Fly Zone™, and Burlington® are registered trademarks owned or held under license by International Textile Group, Inc.

Optional Logos and Pictograms for Hang Tag:

- Pictogram(s) of target insects (mosquito, ant, tick, chigger, fly, and/or midge)
- Burlington Labs logo

