

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 16, 2014

Amy Plato Roberts
Senior regulatory Consultants
Technology Sciences Group Inc.
1150 18th St., NW, Suite 1000
Washington D.C. 20036

Authorized agent for:
Orange Guard, Inc.
3340 Paul Davis Drive, Suite A
Marina, CA 93933

Subject: Label Amendment – Change primary brand name to Orange Guard Spot Treatment, add use for crown gall control, add two alternate brand names
Product Name: Orange Guard For Fire Ant Control
EPA Registration Number: 61887-2
Application Date: July 2, 2014
Decision Number: 493521

Dear Ms. Roberts:


The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Rita Kumar by phone at (703) 308-8291, or via email at kumar.rita@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'MS' followed by a horizontal line and the word 'for'.

Mark Suarez, Product Manager 7
Invertebrate and Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

MASTER LABEL with

Sublabel A: Fire Ant Use

Sublabel B: Crown Gall Use

Orange Guard Spot Treatment

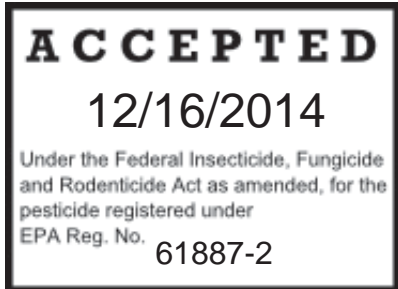
ACTIVE INGREDIENT: d-Limonene (orange peel extract).....5.8%

OTHER INGREDIENTS:94.2%

TOTAL: 100.0%

(Contains 0.46 Lb. Technical d-Limonene per gallon)

EPA Reg. No.: 61887-2
EPA Est. No.: 61887-CA-001



Sublabel A: Fire Ant Use

Orange Guard Spot Treatment

(Alternate Brand Name: "Orange Guard Fire Ant Control")

Fire Ant Control
Water Based Formula
May be used around food, humans and pets
Indoor-Outdoor
Kills Fire Ants through Contact
For Institutional, Commercial, and Domestic Use

ACTIVE INGREDIENT: d-Limonene (orange peel extract).....5.8%
OTHER INGREDIENTS:94.2%
TOTAL: 100.0%
(Contains 0.46 Lb. Technical d-Limonene per gallon)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back (Panel) for Additional Precautionary Statements.

EPA Reg. No.: 61887-2
EPA Est. No.: 61887-CA-001
Net Contents: (128 fl. oz.) (55 Gallons)

Orange Guard Inc.
3340 Paul Davis Drive, Suite A
Marina, CA 93933
www.orangeguard.com

FIRST AID

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 five minutes, then continue rinsing eye. Call a poison control center or doctor immediately for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS: This product may be hazardous to aquatic invertebrates. Do not apply directly to water.

DIRECTIONS FOR USE

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

FOR FIRE ANT CONTROL: Use Orange Guard Spot Treatment full strength or dilute 1 part with 3 parts water. Mounds are treated using a drench and puncture method. Each mound is drenched with a half gallon using a pressurized sprayer. Start spraying around the edge of the mound, stand back and puncture with a 5 ft broom handle ½" in diameter to a depth of 6" to 12". Make sure Orange Guard Spot Treatment penetrates into the punctures in the soil. Saturate ant trails and around the base of trees and shrubs.

FOR STRUCTURE PERIMETER TREATMENT: Spray perimeter of structure generously (full strength). Spray doorways, cracks, window frames- anywhere ants may enter. Saturate until visibly wet. In kitchens, pantries, or any infested areas spray from 8" to 12" directly on ants. Saturate, wait 3 minutes and wipe excess with damp cloth.

(For institutional and commercial use containers)

STORAGE AND DISPOSAL

Do Not Contaminate Water, Food, or Feed By Storage or Disposal.

Pesticide Storage: Store in a dry place no lower in temperature than 50°F or higher than 120°F.

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 instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling For Less Than or Equal to 5 Gallons: Non refillable container. Do not reuse or refill container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat procedure two more times.

Container Handling For Greater than 5 gallons: Non refillable container. Do not reuse or refill container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

(For domestic use containers)

STORAGE AND DISPOSAL

Do Not Contaminate Water, Food, or Feed By Storage or Disposal.

Pesticide Storage: Store in a dry place no lower in temperature than 50°F or higher than 120°F.

Pesticide Disposal and Container Handling: If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Patent Pending

To the extent consistent with applicable law, Gall Busters, LLC will not accept liability for damage or injury resulting from the misuse of this product.

Sublabel B: Crown Gall Use

Orange Guard Spot Treatment

(Alternate Brand Name: "Gall Buster")

(Controls) (Spot treatment for) Crown Gall disease on trees.

ACTIVE INGREDIENT: d-Limonene (orange peel extract).....5.8%

OTHER INGREDIENTS:94.2%

TOTAL: 100.0%

(Contains 0.46 Lb. Technical d-Limonene per gallon)

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back (Panel) for Additional Precautionary Statements.

EPA Reg. No.: 61887-2
EPA Est. No.: 61887-CA-001
Net Contents: (1 Gallon) (55 Gallons)

Orange Guard Inc.
3340 Paul Davis Drive, Suite A
Marina, CA 93933
www.orange-guard.com

FIRST AID

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 five minutes, then continue rinsing eye. Call a poison control center or doctor immediately for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS: This product may be hazardous to aquatic invertebrates. Do not apply directly to water.

DIRECTIONS FOR USE

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

GENERAL INFORMATION: Crown Gall is caused by a bacterium, *Agrobacterium tumefaciens*, which survives in the soil and gall tissue. Crown galls appear as rough, abnormal galls at or below the soil surface on roots and trunks of growing trees. (Product name) kills gall cells but does not harm healthy bark or tissue.

APPLICATION DIRECTIONS: To treat crown galls, apply when trees come out of dormancy in the spring and end when trees start dormancy in the late fall. Only treat the affected gall site. Do not treat foliage, canopy, blossoms or fruits or nuts on trees.

- First remove soil away from the gall until it is fully exposed. Additional galls might be found on the lower crown and on roots. Be sure to expose them when soil is removed.
- Soil can be removed with a shovel or an air compressor. The hole around the crown can be as deep as 12 to 24 inches, and continue around the circumference of the tree, or along the roots, as more gall is exposed.
- Remove as much of the gall tissue as possible by chopping or chiseling gall tissue of the trunk and roots with a hand ax, chainsaw or air chisel.
- When removing the gall, be certain to remove the cambium (bark) or root sheath 1-2 inches beyond the outer edges of the attached gall. This will reduce the chance of gall re-growth along the outer perimeter and interior of an affected area. If galls are found above the crown on a tree trunk, on scaffolding limbs, or at graft sites, carefully remove the galls until healthy trunk tissue is reached at the gall site and around the perimeter of the gall site.
- Use caution when treating trees with a gall encompassing, or almost encompassing, trunks, limbs, or roots. In removing this gall, cutting through the cambium and root sheath, thereby girdling them, can lead to death of the tree, limb

or root. Instead of removing gall tissue drill multiple holes with a 3/8 inch bit approximately 1/2 inch apart into the gall, but not through the gall.

- Apply (product name) at full strength.
- Using a hand-held sprayer, apply (product name) to the point of saturation around the gall site and 3 to 4 inches above the gall site wound. For galls with drilled holes, fill all holes. Spray all areas where the gall has been removed and any location with tissue damage from the removal process.
- Keep gall site open, do not replace the removed soil.
- Do not irrigate for 5 – 7 days or longer after application of (product name) to ensure maximum effect. Do not apply if rain is likely within 5 – 7 days.
- Recheck the gall site wound in 6 to 9 months for reinfection. If any new galls have formed, retreat the live galls. Leave the hole open so it is possible to check for reinfection. If there is no reinfection after a year, the removed dirt can be replaced.

STORAGE AND DISPOSAL

Do Not Contaminate Water, Food, or Feed By Storage or Disposal.

Pesticide Storage: Store in a dry place no lower in temperature than 50°F or higher than 120°F.

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 instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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Container Handling For Greater than 5 gallons: Non refillable container. Do not reuse or refill container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Go to www.gallbusters.com for “Frequently Asked Questions about Crown Gall”

Patent Pending

To the extent consistent with applicable law, Gall Busters, LLC will not accept liability for damage or injury resulting from the misuse of this product.