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OCT 12 1990

Mr. Wallace Tharp
Universal Diatoms Inc.
410 12th NW
Albuquerque, NM 87102

Dear Mr. Tharp:

Subject: Amendment - Label Revisions/Confidential Statement of
Formula/Material Safety Data Sheets
Perma-Guard Household Insecticide D-20
EPA Registration No. 6330-1
Perma-Guard Garden and Plant Insecticide D-21
EPA Registration No. 6330-9
Perma-Guard Pet and Animal Insecticide D-20
EPA Registration No. 6330-32
Your Letter Dated April 23, 1990

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. The words **ACTIVE INGREDIENTS** and **INERT INGREDIENTS** must be printed in type of the same size and be given equal prominence.
2. Based on the current Confidential Statement of Formulas (CSFs) dated July 18, 1989 for the subject products will not meet the label claim for the active ingredients, diatomaceous earth. As stated in our letter, dated February 28, 1990, the lower limit of the active ingredient (column 14b) must be the same as the label claim. The purity of diatomaceous earth (EPA Reg. No. 59910-1) has been reevaluated to be 100% pure active. Therefore the percentage of diatomaceous earth should be $100\% \times 87.9 = 87.9\%$ or 88% for EPA Reg. No. 6330-1 and EPA Reg. No. 6330-32 and $100\% \times 88.5\% = 88.5\%$ for EPA Reg. No. 6330-9 as it appears on the label claim. Please revise the CSFs to agree with the label claim.

CGA

Submit five copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,

George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

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M PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Avoid contact with eyes and skin. In case of contact immediately flush eyes and skin with water. Get medical attention if irritation persists. Use in adequate ventilation and avoid breathing of dust. Use dust mask for prolonged periods of use. Wash hands thoroughly after using and before smoking or eating.

In the home, all food processing surfaces and utensils should be covered during treatment, or thoroughly washed before use. Do not apply directly to food.

Cover fish aquariums before dusting.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to lakes, streams, ponds or public waters. Do not contaminate water by cleaning equipment or disposal of equipment washwastes. Apply this product only as specified on the label.

PERMA-GUARD HOUSEHOLD INSECTICIDE D-20

For control of: roaches, silverfish, ants, bedbugs, houseflies, fleas, box elder bugs, and crickets

ACTIVE INGREDIENTS:

Pyrethrins	0.2%
Technical Piperonyl Butoxide*	1.0%
Diatomaceous Earth	88.0%
Inert Ingredients	10.8%
Total	100.0%

* Equivalent to 0.8% (butylcarbityl) (5-propylpiperonyl) ether and 0.2% related compounds.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Call a physician or Poison Control Center immediately. DO NOT INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

If inhaled - Remove person to fresh air.

If on skin - Remove contaminated clothing and wash affected areas with soap and water.

If in eyes - Flush eyes with plenty of water. Call a physician immediately, if irritation persists.

SEE SIDE PANEL FOR
ADDITIONAL PRECAUTIONARY STATEMENT

DIRECTIONS

It is violation of Federal a product in a manner incon PERMA-GUARD HOUSEHOL for application with hand duste suitable means, to hiding and where pests are found. To appl HOLD INSECTICIDE into crack duster or other suitable equipme in treatment area. The amount t site, but should usually be 8 t treatment as necessary to ROACHES and SILVERFISH: attention to cracks and hidden s and moldings. ANTS, CRICKE Dust lightly areas around wind where pests may enter premise baseboards, moldings, cracks, mattress. FLEAS: Lightly work animal, down to the skin. Use l down to the skin. Pay strict at animal cannot reach, such as th animal with care. Dust the anima the animal sleeps, as well as cra them. Repeat once a month or a observed on the animal should b FLIES: Lightly coat window fra will contact dust.

STORAGE AND

Do not contaminate water age or dis

Storage - Store in a cool, c Keep container closed.

Pesticide Disposal - Waste this product may be disposo proved waste disposal facilit

Container Disposal - Triple offer for recycling or recondi sanitary landfill, or by other procedures.

WARRANTY S

Seller warrants that this product con on the label. Since conditions of us with other chemicals, and conditio vary, seller makes no claims other

BATCH NUMBER _____

NET WT. _____



ACCEPTED
with COMMENTS
in EPA Letter Dated:

Manufactured for:
UNIVERSAL DIATOMS INC
P. O. Box 25282
ALBUQUERQUE, NEW MEXICO 87125-0282
(505) 247-3999

EPA Registration No. 6330-1
EPA Establishment No. 33691-AZ-1

Under the Federal Insecticide, Fungicide, and Rodenticide Act, amended, for the purpose of registered under EPA Reg. No. 6330-1