

FEB 28 1990

345/250109
18/1

Mr. Wallace Tharp
 Universal Diatoms Inc.
 410 12th Street
 P.O. Box 25282
 Albuquerque, NM 87102-0282

Dear Mr. Tharp:

Subject: Amendment - Update Labeling/Confidential Statement of Formula/Add
 Uses
 Perma-Guard Garden and Plant Insecticide
 EPA Registration No. 6330-9
 Your Application Dated July 18, 1989 and February 15, 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. Delete the heading "First Aid" and the paragraph beneath this heading since this information already appears on the front panel.
2. The paragraph under "Environmental Hazards" should read:

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 washwaters. Apply this product only as specified on the label.
3. You can delete the paragraph beginning "This product is toxic to fish. Do not apply ..." under the heading CAUTION since this information already appears under Environmental Hazards.
4. The upper and lower certified limits in the confidential statement of formula must be based on the pure active ingredients in the source products. Also the lower limit of the active ingredient (column 14b) must be the same as the label claim. Pyrethrum Extract under EPA Reg. No. 4816-17 is 20% pure. So $20\% \times 1.05\% = 0.21\%$ which should be reported under column 14b. Likewise diatomaceous earth (EPA Reg. No. 59918-1) is 95% pure. So $95\% \times 88.42\% = 83.99\%$ or 84%. Column 14b and the label must agree. Please revise the label or the CSP to the information agreed.
5. Active ingredients and Inert ingredients must be aligned to the same

margin and be of equal prominence.

6. Delete the statement, "When used as directed allowable tolerance levels will not be exceeded".
7. Change "On Growing Crops" to "On the Following Crops" under Directions for Use. Likewise the first sentence should be changed to read:

This dust may be used on the following crops growing outdoors or in greenhouses, up to and including the day of harvest.

8. Delete the sentence, " This material may be used as a post-harvest dust." Complete directions must be given for post-harvest use. Also only those commodities that have tolerances can be listed.
9. Add the following footnote to the label ingredient statements "** Equivalent to 0.8% (butylcarbityl)(6-propylpiperonyl)ether and 0.2% related compounds.

Please verify the 1 to 3lb per acre application rate. How was this rate calculated for a per acre basis? What equipment was used?

The subject product file does not contain complete product chemistry information as required under section 158.120 of the Product Chemistry Guidelines. Refer to the attachment regarding the information requested.

Submit five (5) 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 yours

George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (H7503C)

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.

This product is toxic to fish. Do not apply directly to lakes, streams, ponds or public waters. Do not apply outdoors when weather conditions favor drift from the treatment area. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply this product only as specified on this label.

FIRST AID

If swallowed: Do not induce vomiting. Get immediate medical attention. Avoid contact with skin and eyes. In case of contact, immediately flush eyes or skin with plenty of water. Obtain medical attention if irritation persists.

Do not apply directly to food. In commercial food handling facilities, cover or remove any food and food processing equipment during application. Do not apply while food processing is underway. After space dusting food processing plants, thoroughly wash all equipment, benches, shelving, etc., where exposed food will be handled, with an effective cleaning compound followed by a potable water rinse.

In the home, all food processing surfaces and utensils should be covered during treatment, or thoroughly washed before use.

Cover fish aquariums before dusting.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams, or ponds. Do not contaminate water by cleaning equipment or disposal of wastes. Apply this product only as specified on the label.

**PERMA-GUARD
GARDEN and PLANT
INSECTICIDE
D-21**

ACTIVE INGREDIENTS:

| | |
|------------------------------------|--------|
| Pyrethrins | 0.1% |
| Technical Piperonyl Butoxide | 1.0% |
| Diatomaceous Earth | 88.5% |
| INERT INGREDIENTS: | 10.4% |
| TOTAL: | 100.0% |

**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 STATEMENTS**

ACCEPTED

with COMMENTS

BATCH NUMBER in EPA Letter Dated:

NET WT. EB 28

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 6330-9
UNIVERSAL DIATOMS INC.
P. O. Box 23282

ALBUQUERQUE, NEW MEXICO 87125-0282
(505) 247-3888

It is a v... product
The component Diatomaceous will not be ex...
ON GROWING outdoors or in g... material may be... use, cautions, INSECTICIDE applying this d... This material sh... leaf surfaces a... thickness, but PERMA-GUAR this label. For la... in better covera...

Storage - Sto... closed.
Pesticide Dis... be disposed o...
Container Dis... or recondition... approved Stat...

ASPARAGUS: A Mexican Bean Be...
BRUSSELS SP... worm, Diamond...
bageworm, Stink...
Tlar. CORN: Corn...
worm. CRANBER...
Colorado Potato...
Berley, Oats, Sor...
Cabbage Looper...
Cabbage Worm...
ported Cabbage...
PASTURE GRAS...
pillers. PEANUTS...
PECANS: Pecan...
PEPPERS: Green...
Fla Beets, Leaf...
Beets. SOY BEA...
SPINACH: Aphid...
Flies. TOMATO...
Fla Beets. ORN...
Carnifera, Carn...
Gallfly, Aphid...