

JAN 15 1992

300-5409205
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Mr. Sam Ginsberg
Perma-Ganic
202 Turnpike
Dallas, TX 75208

Dear Mr. Ginsberg:

Subject: Amendment - Revised Labeling
Insectaside d.e.
EPA Registration No. 56194-1
Your Letter Dated December 11, 1991

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. We note the product names "Insectaside d.e." and "Diastroy d.e.". The name Diastroy is not acceptable because it implies destroy. Terms with state or imply total eradication of pest are not acceptable. The product name "Insectaside d.e." is acceptable and will be considered as the basic product name.
2. The words, **ACTIVE INGREDIENTS** and **INERT INGREDIENTS**, must be printed in type of the same size, be given equal prominence, and be aligned in the same margin. Also the ingredient statement must appear on the front panel.
3. Add a subheading beneath the Precautionary Statement titled **Hazards to Humans and Domestic Animals**. This appeared on previously accepted labeling.
4. Add specific instructions on how to apply product as it appeared on previously accepted labeling (see attached label).
5. Delete the statement "contains no chemicals or other additives" since this is a implied safety claim and unacceptable. The front panel statement " Kills by physical, not chemical action" is an acceptable description of the mode of action of this chemical.

- 6. Please identify the correct company name on the product label, i.e., Safe Organic Environment, Inc or Safe Environment, Inc.

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

4.5oz

Insect-aside d.e.

Safe Organic Environment, Inc.
Roach Killer (Diatomaceous Earth)

Kills by physical, not chemical action

WHAT IS IT:

Diatomaceous earth is made up of fossilized deposits of algae called diatoms. Diatoms weave tiny shells out of the silica they extract from water. As they die, their shells become fossilized into diatomaceous earth (D.E.) or diatomite.

HOW DOES IT WORK:

The microscopic sharp shells of diatomite scratch the wax coating of the insect's skeleton causing the insect to lose moisture and die. D.E. does not kill instantly. Death by dehydration takes about 12 hours.

KEEP OUT OF REACH OF CHILDREN
See precautionary statement on back
NET WT 4.5 OZ (128 g)

Insect-aside d.e.

DIRECTIONS FOR USE:

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

Apply dust in cracks, crevices, around baseboard, places where roaches hide. Apply behind cabinets, sinks, appliances, furniture and in waste containers.

PRECAUTIONARY STATEMENTS:

Avoid breathing the dust. If in eyes, flush with water. Call a physician if irritation persists.

DISPOSAL:

Do not reuse empty container. Wrap container and place in trash collection.

INGREDIENTS:

Silicon Dioxide, from diatomaceous earth
Other Ingredients, including moisture
Contains no chemicals or other additives.

Manufactured by:
Safe Environment, Inc.
309 Ridgewood
Richardson, Texas 75080
(214) 690-1075

EPA Registration No.
56194-1
EPA Establishment No.
56194-001

UPC CO
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