UNITED STATES ENVIRONMENTAL PROTECTION . ENCY

FEB 5

301 541037

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 January 24, 1992

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. As indicated in comment 2 of our January 15, 1992 letter, revise the ingredient statement as follows:

ACTIVE INGREDIENTS

Silicon Dioxide, from diatomaceous earth..... 85%

INERT INGREDIENTS (including moisture)..... 15%
100%

2. Revised the heading for the Precautionary Statements as follows:

Precautionary Statements

Hazards to Humans and Domestic Animals

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

3. The signal word CAUTION must appear on the front panel of the label above the KEEP GUT OF REACH OF CHILDREN.

CONCURRENCES						
SYMBOL						
SURNAME CA		*********	*************	'	** *	************
DATE 113192						
EPA Form 1320-1A (1/9C)	Printed on Recycled Paper				OFFICIAL FILE COPY	

We not the change in active ingredient from 85% to 99%. We cannot accept this change until you submit specific analysis data identifying by percentage all of the chemical components in your new source of diatomaceous earth.

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.

As per our conversation on January 30, I am enclosing year a copy of PR Notice 86-5, which gives details as to how data should be submitted to the Agency, along with answers to the most common questions asked about the Notice. Also enclosed is the Federal Register (Vol. 54, No. 158, Thurs. 8/17/89) on Good Laboratory Practice Standards.

If you have any questions regarding the enclosed information on data formatting, please contact Maureen Sherrill or Teresa Downs of the Information Services Branch on (703) 305-5240.

Sincerely,

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

Enclosure

WHY CHANGE OF THE

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Feb 5 1992

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BEST AVAILABLE COP'S

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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 diatomile 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.

INGREDIENTS:

KEEP OUT OF REACH OF CHILDREN See precautionary statement on back

NET WT 4.5 OZ (128 g)

nsec

DIRECTIONS FOR USE It is a violation of federail: that is inconsistent with its

Apply dust in cracks, crevice places where roaches his cabinets, sinks, appliance waste containers.

PRECAUTIONARY STAT Avoid breathing the dust. I Call a physician it imitation

DISPOSAL:

Do not reuse empty contain place in trash collection

INGREDIENTS: Silicon Dioxide, from diato Other Ingredients, including Contains no chemicals of

TRACKICS OF SAFE Sale Environment, Inc. 309 Ridgewood Richardson, Texas 75080 (214) 690-1075

EPA Registration No SATMAT EPA Establishment No 56194-10-001