

OCT 4 2005

PERMA CHINK SYSTEMS
17635 N.E. Systems, Inc.
Redmond, WA 98052

Dear Mr. Talarek:

Subject: Label Revisions
EPA Registration No. 59905-6
Product Name: SHELL GUARD
Application Date: April 1, 2005

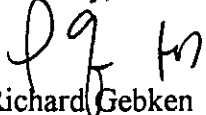
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comment listed below.

a) The Personal Protection Equipment statement must be included in the PRECAUTIONARY STATEMENT Section of the labeling as follows: Avoid inhalation of spray mist. In confined spaces wear a mist respirator, protective eye wear such as goggles, face shield or safety glasses, long sleeve shirt and gloves, long pants and shoes plus socks.

Enclosed is a copy of your stamped label "Accepted with Comments". Submit four (4) copies of the final printed labeling before you release the product for shipment.

To expedite handling, please return a copy of this letter with (4) copies of the revised final printed labeling for review. If you have any questions regarding this letter, contact Ms Pat Quarles @ (703) 305-7876.

Sincerely,


Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505

enclosure

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SHELL-GUARD

Termiticide, Insecticide and Fungicide Concentrate
For all Wood

For the PROTECTION and PREVENTIVE TREATMENT OF WOOD AGAINST TERMITES, CARPENTER ANTS, WOOD DESTROYING BEETLES and WOOD DECAY FUNGI, and for REMEDIAL CONTROL of such PESTS in INFESTED WOOD or WOOD FOAM COMPOSITES

- Use on above ground wood surfaces including logs, timbers, dimensional lumber, decks, siding, wood foam composites, etc.
- For REMEDIAL TREATMENT of wood destroying organisms
- For PREVENTATIVE TREATMENT of wood in existing structures
- For PRE-TREATMENT of wood during construction
- Non-staining, no unpleasant odor
- Simply mix with equal part warm water for application

ACTIVE INGREDIENT:

Disodium Octaborate Tetrahydrate (Na₂B₈O₁₃·4H₂O)..... 25.31% by weight

OTHER INGREDIENTS: 74.69% by weight

TOTAL 100.00% by weight

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for first aid and additional precautionary statements

EPA Registration No. 59905-6

EPA Establishment No. 59905-TN-1

Perma-Chink Systems, Inc.
17635 N.E. 67th Court
Redmond, WA 98052

NET CONTENTS: 25.76 lbs. (11.71 kg) 2.5 gals. (9.47 liters)

Made in the USA

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**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

OCT 4 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

59905-6

h/c

Personal Protective Equipment (PPE)
Use a

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed. Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food or feed. Do not leave container where children or animals may gain access. Avoid inhalation of spray mist. ~~Use~~ Using a mist respirator in confined spaces. Use of gloves, protective clothing (long sleeves and shoes) and eye protection is recommended.

ENVIRONMENTAL HAZARDS

SHELL-GUARD® solutions carelessly spilled or applied to cropland or growing plants, including trees and shrubs, may kill or seriously retard plant growth. Do not contaminate water when disposing of equipment wash-waters. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark.

FIRST AID

If swallowed	<ul style="list-style-type: none"> - Call a poison control center or doctor immediately for treatment advice. - Have person sip a glass of water if able to swallow. - Do not induce vomiting unless told to by a poison control center or doctor. - Do not give anything to an unconscious person.
If in eyes	<ul style="list-style-type: none"> - 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. - Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> - Move person to fresh air. - If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. - Call a poison control center or doctor for further treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> - Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes. - Call a poison control center or doctor 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 1-800-424-9300 for emergency medical treatment information.

GENERAL INFORMATION

SHELL-GUARD® is a water-soluble inorganic borate salt containing compound with insecticidal, termiticidal and fungicidal properties.

DIRECTIONS FOR USE

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

SURFACE PREPARATION

Wood must be clean and bare: free of dirt, wax, and surface finishes. Remove all previous coatings or sealants. Remove mold or mildew prior to applying **SHELL-GUARD®**. Do not apply to frozen wood. Surface temperature must be between 40°F and 90°F.

PREPARATION OF TREATMENT SOLUTION

An aqueous solution is used for treatment. To prepare solution, stir an equal amount by volume of **SHELL-GUARD®** into warm clean water. Stir or agitate while adding until **SHELL-GUARD®** is completely dissolved in the water. Use the mixture within 24 hours as settling of concentrate may occur. Mix in separate container; do not mix in spray applicator.

REMEDIAL AND PREVENTIVE TREATMENT

For remedial and preventive control of organisms attacking wood, apply the diluted solution of **SHELL-GUARD®** by brush, spray or dipping until surface is thoroughly wet (1 gal. per 108 sq. ft.). Thoroughly soak cut ends. Application may also be made by drilling and then injecting the solution under pressure into sound wood or until run-off is observed from entry/exit holes of infested wood. Treatment methods as described yield an approximate retention level of .24 lbs. per cubic ft. boric acid equivalent (BAE) in the outer 3/4" of the wood. To minimize borate leaching, apply a water resistant sealer AFTER THE SURFACE IS DRY TO THE TOUCH - in low temperature and high humidity locations this may take 1-4 weeks.

CLEANUP

Clean up tools and equipment with water. Rinse well and allow to dry.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Do not freeze. Do not store where children or animals may gain access.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

NOTICE

Because of many varying conditions affecting use and application, manufacturer warns buyer that these may impair or vary the results or effects of the use of this product. In any event, complete prevention of decay by fungi or other organisms is not guaranteed. Neither manufacturer nor seller shall be liable in respect to any injury or damages suffered by reason of use of this product for a purpose not indicated by the label, or when used contrary to the directions or instructions hereon, nor with respect to breach of any warranty not expressly specified herein. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling, except when used or handled in accordance with this label. There are no express or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. Manufacturer shall not be liable for any consequential damages based on the use of this product.

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Seller makes no warranty expressed or implied concerning the use of this product, other than as indicated on the label. Buyer assumes all risk of use and/or handling of this material when use and/or handling is contrary to label instructions.

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