

SEP 28 2001

Mr. Terry Hofrichter
Perma-Chink Systems
17635 NE 67th CT
Redmond, WA 98052

Subject: Label Amendment
Armor-Guard
EPA File Number: 59905-9
Application Dated: June 20, 2001

Dear Mr. Hofrichter:

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

1. In accordance with PR Notice 2001-1, revise your First Aid Statement to read as follows:

IF SWALLOWED: 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 do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN
or Clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center for treatment advice.

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IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

2. Add the following statement to your labeling, so that it is prominently displayed in the Directions of Use.

This product is not a substitute for mechanical alternation, soil treatment or foundation treatment but merely a supplement. For active infestations, get a professional inspection.

3. You must submit the efficacy data, for the Agency's files that support the following application rates and uses, within six months from the date of this letter.

a. **Under the subheading "Powder":** Alternatively, apply Armor-Guard powder.....(12-14 grams) per square foot.

b. **Under the subheading "FOAM":** Apply foam so that all accessible wood.....Foam can be injected into galleries until run-off observed from tick holes or entry/exit holes.

4. You must remove all claims to "New Construction", since this will require efficacy data. You can address this data requirement by submitting data or citing data from a substantially similar product.

A stamped copy of the label is enclosed. Submit three copies of revised final printed labeling prior to releasing product for shipment.

Sincerely,


Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division (7505c)



ACCEPTED
with COMMENTS
In EPA Letter Dated:
SEP 28 2001

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this product is registered for the use as a wood preservative under EPA Reg. No. 59905-9

Wood Preservative / Insect Control

For PRE-TREATMENT OF WOOD DURING CONSTRUCTION and for the PROTECTION AND PREVENTATIVE TREATMENT OF WOOD* against decay fungi and wood destroying insects and for remedial control of such pests in infested wood.

(*Also for wood-foam composite structural components.)

ACTIVE INGREDIENT:

Disodium Octaborate Tetrahydrate 98% by weight
(Na₂B₈O₁₃·4H₂O)

INERT INGREDIENT: 2% by weight
(Product contains 2% H₂O-absorbed moisture)

Total 100% by weight

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements

EPA Reg. No. 59905-9
EPA Est. No. 59905-TN-001

NET CONTENTS:
25.0 lbs. (11.5 kg)

Perma-Chink Systems, Inc.
17635 N.E. 67th Ct.
Redmond, WA 98052
1-800-548-1231

Manufactured by:

Made in the USA

Perma-Chink Systems, Inc.
1605 Prosser Road
Knoxville, TN 37914
1-800-548-3554

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION:

Harmful if swallowed. Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food and feed. Do not leave container where children or animals may gain access.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED, immediately contact a physician or Poison Control Center. If these are unavailable, give the victim 1 or 2 glasses of water and induce vomiting by touching back of throat with fingers. Do not induce vomiting or give anything by mouth to an unconscious person. **IF IN EYES**, flush with plenty of water. Get medical attention if irritation persists. **IF ON SKIN**, remove contaminated clothing and wash skin with soap and water. **IF INHALED**, remove victim to fresh air.

ENVIRONMENTAL HAZARDS

"Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA".

STORAGE AND DISPOSAL:

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in a dry place. Do not store where children or animals may gain access.

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

Container disposal: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

PROTECTIVE EQUIPMENT

Wear waterproof gloves, eye protection, protective clothing (e.g., long sleeve shirt and shoes) and MSHA/NIOSH approved dust/mist mask respiration (in confined spaces) when utilizing ARMOR-GUARD powder or solution.

DIRECTIONS FOR USE:

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

ARMOR-GUARD is water-soluble inorganic borate salt with insecticidal and fungicidal properties effective against wood-destroying organisms, including the target pests listed below. This product can be used for remedial treatment of infested wood for preventative treatment (before signs of infestations) for wood in existing structures, or for PRE-TREATMENT OF WOOD DURING CONSTRUCTION.

ARMOR-GUARD is recommended for wood and cellulose materials, in accordance with the specific treatment methods described herein. ARMOR-GUARD is effective for all interior and exterior wood (and wood-foam composite structural components) that will be protected from excessive rain and not in direct contact with soil. Types of wood include, but are not limited to all types of lumber, logs, and plywood. This product is toxic to wood-destroying insects, but surface etching of treated wood by target organisms may occur.

TARGET ORGANISMS

ARMOR-GUARD is effective for treatment of wood (and wood-foam composite structural components) against decay fungi, including brown (i.e. *Poria*), white and wet rot, and wood-boring insects such as but not limited to the following termites, beetles and carpenter ants:

Subterranean Termites
Reticulitermes, *Heterotermes*,
Coptotermes (*Formosan*)
Drywood Termites
Kaloterms, *Incisitermes*
Dampwood Termites
Zootermopsis
PowderPost Beetles
Lyctidae
Carpenter Ants
Camponotus

"False" PowderPost Beetles
Bostrichidae
Furniture and Deathwatch Beetles
Anobiidae
Old House Borers,
Lhorn Beetles
Cerambycidae
Ambrosia Beetles
Scolytidae

PREPARATION OF TREATMENT SOLUTION:

10% aqueous solution: To prepare solution, water should be added to the tank to about 80% of the final volume of solution required. While agitating, add 1.0 pound of ARMOR-GUARD gradually for each gallon of treating solution required. The remaining water is then added and the solution is agitated until the product has dissolved.

15% aqueous solution: Prepare solution as above, but gradually add 1.5 pounds of ARMOR-GUARD for each gallon of treating solution that is required. Note: this concentrated solution should be used immediately and should not be stored. Equipment should be cleaned with soap and water, and rinsed after use.

15% foam: Prepare 15% aqueous solution as listed above and add surfactant/foaming agent. Typically 1-2 ounces of foaming agent added to the 15% aqueous solution will produce dry foam with the desired expansion ratios of approximately 20 to 1 (approx. 20 gallons of foam per 1 gallon of aqueous solution). ARMOR-GUARD foam should be of a "dry" consistency that each foam machine can produce referring to the equipment manufacturer manuals and the surfactant's label for specific instructions.

Application

ARMOR-GUARD may be used as a solution, powder or foam. Two applications of 10% solution or one application of 15% solution can be typically applied to wood surfaces by brush or spray. Application of the solution may also be made by drilling and then injecting under pressure into sound wood or the galleries of infested wood. As foam, ARMOR-GUARD may be applied directly to wood surfaces or injected into insect galleries, or wall voids.

Remedial and preventative treatment

Solution

For remedial control of organisms attacking wood, or for protection of wood against future infestations, 2 applications of the 10% aqueous solution are normally required. Alternatively, apply 1 application of the 15% aqueous solution. Apply solutions of ARMOR-GUARD by brush or spray until wood surface is thoroughly wet, at a rate of approximately 5 gallons per 1000 square feet of wood surface area. 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.

Powder

Alternatively, apply ARMOR-GUARD powder to wood members by drill and injection into galleries or dust generously on wood surfaces. ARMOR-GUARD powder can also be injected into wall voids such as between studs, block voids, box sill, eaves, attics, soffits, etc. Apply powder at a rate of approximately 0.5 ounces (12-14 grams) per square foot.

Foam

Apply foam so that all accessible wood surfaces are covered with foam. Where possible, place foam between wood joints or abutting wood surfaces. In wall voids, inject enough foam to contact wood surfaces of studs in the wall, or the target area desired. Foam can be injected into galleries until run-off observed from kick holes or entry / exit holes.

New Construction Pre-Treatment of wood

For new construction, apply ARMOR-GUARD to all wood surfaces after applying a band of SHELL-GUARD "two feet up and two feet in" around all base perimeter wood of the structure and applying SHELL-GUARD to all wood members or combinations over 1-1/2" in thickness (this includes all wood that has both dimensions greater than 1-1/2" inches and "sistered" framing members, i.e. window frames & door frames)

Application can be made by spray, foam or powder/dust. Apply solution to all accessible framing, sheathing, and all other wood used in the structure. Apply two coats of 10% solution or one coat of 15% solution. Apply to one side of wall and roof sheathing. (Alternatively, when applying 2 coats of 10% solution, you may apply 1 coat to each side of the sheathing.) Apply to underside of floor decking and to all joists, studs and other framing members. Application should be performed after framing and roofing are in place and before insulation and dry wall are installed. Avoid spraying electrical components. Protect treated wood from excessive rain. End-cuts of wood may also be treated by the application methods listed above, or by 1-5 minute dipping in ARMOR-GUARD solution.
See application supplement AS-001 for additional information.

*General insect control

ARMOR-GUARD powder may also be used as a crack and crevice and void treatment for general insect control such as Roaches, Silverfish, Earwigs, Crickets and Ants. ARMOR-GUARD may not be used for flea control. ARMOR-GUARD 15% aqueous solution may be used as a crack and crevice treatment only.

Dust ARMOR-GUARD powder into wall voids and hiding places such as in cracks and crevices, moist areas, openings around pipes and sinks, under refrigerators, behind baseboards, coffee makers, meter boxes and manholes. No powder should be visible in living areas after application. Any powder visible after application must be brushed into crack and crevices or removed. Apply only in areas inaccessible to children and pets. Avoid contamination of feed and foodstuffs. Do not use in serving areas when food is exposed.

Application of ARMOR-GUARD powder or 15% aqueous solution is limited to crack and crevice treatment only in food areas of food handling establishments. Apply ARMOR-GUARD powder or 15% aqueous solution between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where insects hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces. Applications of this product in the food areas of food-handling establishments other than as a crack and crevice treatment are not permitted.

Notice

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. Because of many varying conditions affecting use and application, manufacturer warns 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 the 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 expressed 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 the product.