

62451-4

11/30/2004

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 30 2004

Katherine A. Buteau
Technology Sciences Group, Inc.
712 Fifth Street, Suite A
Davis, California 95616

Subject: Label Amendment to Update Storage and Disposal Statements

Ant Guard™ Coasters and Covers
EPA Reg. No. 62451-4
Your Submission Dated August 3, 2004

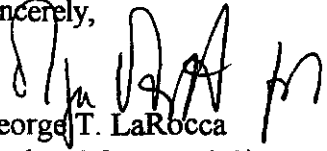
Dear Ms. Buteau:

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Change "insects" to "ants" in fourth paragraph on page 2.
2. Change "ant proof" to "kills (repels)" in fifth paragraph on page 2.
3. Change "crawling insects" to "ants" in third paragraph under Directions for Use and "insects" to "ants" in the last paragraph on page 3.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,


George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosure

FRONT PANEL
(size in inches)

AntGuard® Coasters & Covers

For Commercial or Residential Use

ABN AntGuard®Ant-Proof Tray

- Maintenance - Free
- 12 to 18 Months of Control / Long-Lasting
- Keep Ants Off / Keep Fire Ants Off
- Easy to Use
- Rugged Construction / Parts Easily Interlock by Hand
- For use indoors and outdoors where ants can be deterred by interrupting routes of travel.
- Ants are killed and repelled by the unique AntGuard® insecticide-impregnated plastic.
- Multi-Function Adapters available for specialty applications.
- Can be easily moved to alternate locations.
- Kills and repels Ants and keeps them away for up to one year/ 1.5 years.
- Kills and repels Ants (Fire Ants, Argentine Ants, Pharoah Ants), Even kills and repels fire ants.
- Versatile – countless uses! Keeps ants out of
- Potted plants
- Plants growing in containers
- Pet food dishes
- Holds up to XX lbs.
- Lightweight & portable
- No assembly required
- Guaranteed results or your money back

**ACCEPTED
with COMMENTS
in EPA Letter Dated
NOV 30 2004**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
02451-4

Active Ingredients:

Permethrin	10.3%
Piperonyl Butoxide	13.0%
Other Ingredients:	76.7%

Do not allow Children or Pets to Play With This Product
CAUTION
 SEE SIDE PANEL FOR ADDITIONAL
 PRECAUTIONARY STATEMENTS

SIDE PANEL
(size in inches)

The AntGuard® system kills and repels ants.

[Alternative text]AntGuard kills and repels ants and keeps them away for up to one year. Ants can't crawl up and into/on/in anything [you put] on top of the tray/coaster/cover/pallet.

That's because AntGuard comes with ant-killing [ant-repelling] permethrin disks built into the undersurface of the tray/coaster/cover/pallet that kills [repels] ants so the ants can't reach the tray.

Due to the patented AntGuard design, only insects crawling on the under-side of the tray/coaster/cover/pallet will come into contact with the disks.

The treated disks slowly release the repellent, so the tray/coaster/cover/pallet stays ant proof for months. In studies by leading university researchers the disks kept working for up to 18 months! We guarantee the tray/coaster/cover/pallet will with stand the elements and keep working for at least 12 months after purchase if used properly or your money back.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-858-7378 for emergency medical treatment

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

If you touch the protective (yellow) disks, wash thoroughly with soap and water before eating, drinking or using tobacco. Do not allow children to play with this product. Avoid contact of disks to feed and foodstuffs.

ENVIRONMENTAL HAZARDS

The active ingredients are toxic to fish. Keep out of lakes, streams or ponds. Do not contaminate water by disposal of used AntGuard®. Use the product only as specified on the label.

STORAGE AND DISPOSAL

Store AntGuard® in original container. Store in cool, dry place. Do not store with food, drugs or personal contact items.

Disposal: Place in trash or offer for recycling if available.

SIDE PANEL
(size in inches)

DIRECTIONS FOR USE

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

- Helps guard from crawling insect infestation at points of entry.
- Easy to apply/use.

Ants are attracted to food, debris and low-frequency electronic noises. The plastic disk in AntGuard® Coasters & Covers is impregnated with a repellent/insecticide that kills and repels ants, including fire ants. AntGuard® Coasters & Covers are designed to withstand the elements for 12 months. Do not open the package until ready to use.

AntGuard® Coasters go under, and will accept, table legs, bed legs, cot legs, and many other types of legs and supports. AntGuard® Covers go over wheeled casters on table legs, bed legs, cot legs and many other types of wheeled legs and supports. AntGuard®Coasters & Covers can be used both indoors and outdoors. Apply AntGuard®Coasters & Covers under or fitted over wheeled casters on any of the following to deter crawling insects by interrupting routes of travel:

- | | |
|-------------------------------------|------------------------------------|
| Bed and bed frames, | Military beds and cots in barracks |
| Tables | Indoor and outdoor furniture |
| Pallets* | Food storage racks and shelves |
| Laboratory storage or rearing racks | Animal cages or houses |
| RV and Camper awnings | Bee Hive Racks |
| Barbeque grills* | Flowerpots |
| Dog and cat food bowls | |

*See Multi-Function Adapters. Contact your *AntGuard®* distributor for details.

[Alternative text]

Do not open package until ready to use.

Position tray/coaster/cover/pallet under the item you want to protect such as a bowl, pet/cat/dog food bowl, potted plant , furniture, racks, shelves, etc on a hard, flat surface. Be sure the item you want to protect weighs less than XX lbs./pounds.

Keep tray/coaster/cover/pallet and items you wish to protect away from walls to ensure that insects cannot bypass the legs and sneak directly onto the item you want to protect. See illustrations for placement tips.

That's all there is to it. Now ants won't crawl up the tray/coaster/cover/pallet {Illustration: show plant being trimmed so that leaves don't touch the ground tray/coaster/cover/pallet being placed too close to the wall so that ants can gain access directly from there} .

Optional label claims for residential uses:

To clean: Simply wipe with a damp cloth. Do not place in dishwasher.
This is not a toy.

To install:

AntGuard®Coasters & Covers utilize a plastic disk impregnated with an insecticide to kill or repel ants including fire ants. AntGuard®Coasters & Covers are sold assembled; do not open package until ready to use. Position coasters under use sites, one coaster for each leg or support. See illustration. Position AntGuard®covers over wheeled casters, one for each leg or support. See illustration.

AntGuard® begins to repel ants instantly and all ant activity should stop within 24 hours. Under normal conditions AntGuard®will give 12 months of control.

***For specialty applications, use one of the following Multi-Function Adapters:**

Pallet Adapter - Designed for use under any flat-bottomed surface, including heavy loads.

Shallow Leg Adapter -Designed for front legs of cart or other devices that have two wheels.

Pet Dish Adapter - Designed to accommodate any size pet dish.

Contact your AntGuard® distributor for details.

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BACK PANEL
(size in inches)

NOTICE

Buyer assumes all responsibility for safety and use not in accordance with directions.

Manufactured for:

LineGuard, Inc.

P.O. Box 839

Elyria, OH 44036

U.S. Patent Nos. 4,782,662; 4,890,416, 5,274,950

(telephone number)

www.lineguardinc.com

AntGuard® is a trademark of LineGuard, Inc.

Made in U.S.A.

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DEVICE LABEL

AntGuard® Coasters & Covers

Active Ingredients:

Permethrin 10.3%

Piperonyl Butoxide 13.0%

Other Ingredients: 76.7%

SEE LABEL FOR PRECAUTIONARY STATEMENTS AND DIRECTIONS FOR USE.

Optional label claim for residential uses:

This is not a toy.

EPA Reg. No. 62451-4

EPA Est. No. 69518-OH-001

Manufactured for: LineGuard, Inc. (telephone number); www.lineguardinc.com

Storage and Disposal
Store AntGuard® in original container. Store in cool, dry place. Do not store with food, drugs or personal contact items.
Disposal Place in trash or offer for recycling if available.