

62451-4

10/21/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 21 2005

Ms. Heather R. Bjornson
Regulatory Assistant for LineGuard, Inc.
P.O. Box 839
Elyria, OH 44036

Subject: Revised Labeling
EPA Reg. No. 62451-4
Your e-mail dated October 14, 2005

Dear Ms. Bjornson:

The labeling referred to above, submitted in connection with the registration under the Federal Insecticide, 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. Revise "Ant Guard Ant-Proof Tray" to "Ant Repellent Tray"
2. Under Optional text for Alternate Brand Name change "ant proof platform" to "ant repellent platform", throughout the text.

The alternate brand name "Ant Guard Kit" is acceptable.

If you have any questions in regard to the letter please feel free to contact me at 703-305-6100.

Sincerely,

A handwritten signature in black ink, appearing to read "George T. LaRocca".

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

Enclosure

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ACCEPTED
with COMMENTS
In EPA Letter Dated:

OCT 21 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
62451-4

[All text in brackets [] is optional]

FRONT PANEL
(size in inches)

AntGuard® Coasters & Covers

[Alternate Brand Names: AntGuard® Ant-Proof Tray and AntGuard® Kit]

For Commercial or Residential Use

- 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® Coasters & Covers 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

Active Ingredients:

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS

EPA Reg. No.62451-4 EPA Est. No. 69518-OH-01
Net Wt. XX Gr Contents: XX Unit(s) [4 Ant Repelling Feet]

SIDE PANEL
(size in inches)

The AntGuard® Coaster & Covers system kills and repels ants.

[Alternative text] AntGuard® Coasters & Covers 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® Coasters & Covers comes with ant-killing [ant-repelling] permethrin disks built into the undersurface of the tray/coaster/cover/pallet that kills [repels] ants can't reach the tray.

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

The treated discs slowly release the repellent, so the tray/coaster/cover/pallet stays killing [repelling] 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 in the disks are toxic to fish. Keep out of lakes, streams or ponds. Do not contaminate water by disposal of used AntGuard® Coasters & Covers. Use the product only as specified on the label.

STORAGE AND DISPOSAL

Store AntGuard® Coasters & Covers 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 - 18 months. Do not open the package until ready to use.

AntGuard® Coasters & Covers go under, and will accept, table legs, bed legs, cot legs, and many other types of legs and supports. AntGuard® Coasters & 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 ants 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* | |
| Dog and cat food bowls | |

*See Multi-Function Adapters. Contact your AntGuard® Coasters & Covers 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, potted plant, furniture, racks, shelves, etc. Be sure the item you want to protect weighs less than XX lbs./pounds.

Keep tray/coaster/cover/pallet under the items you wish to protect away from walls to ensure that ants 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 (bugs) 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 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® Coasters & Covers over wheeled casters, one for each leg or support. See illustration.

AntGuard® Coasters & Covers begins to repel insects instantly and all ant activity should stop within 24 hours. Under normal conditions AntGuard® Coasters & Covers will give 12 – 18 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® Coasters & Covers 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® Coasters & Covers 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.

Optional Text for the Alternate Brand Name: AntGuard® Kit

- Keep ants out of garbage cans, items in utility areas & more.
- Make ant proof platforms, trays & pallets in minutes
- Adaptable/ variable size to fit your need
- (Up to 40" x 30")
- Build ant proof platform / tray / stands up to 40" x 30"
- For bulk (pet) food, garbage cans, storage bins, utility areas, etc. & more
- DIY Ant Stopping Kit
- Easy (EZ), reliable way to keep ants out
- Clean & easy way to keep ants away
- Contents: 4 Ant Free / Stopping / Killing / Repelling Feet
- 4 Independent Ant Free / Stopping / Killing / Repelling Feet
- 4 Feet will support up to 250 lbs. [when used as directed]
- Make your own Ant Free / Stopping/ Killing / Repelling Platform to keep ants out of garbage cans, items in utility areas and bulk foods such as pet food.

The AntGuard® Kit comes with four ant-repelling/ killing 'feet'. Simply attach the feet to plywood using the enclosed self-adhesive tape. The ant free/ stopping / repelling / killing feet will begin to repel/stop ants instantly and give up to 18 months control without maintenance or mess.

Place the four enclosed plastic AntGuard® Kit repelling devices, or feet, on the under-surface of a flat, rigid piece of plywood. The AntGuard® Kit feet will begin to repel ants instantly and give up to 18 months of control. Ants can't crawl up and into anything you put on top of the plywood for up to 18 months. Each package of 4 independent ant proof feet will support a plywood platform up to 40" x 30" (3 1/3 ft x 2 1/2 ft)

To install:

Do not open package until ready to use.

- 1) Cut plywood to size – up to 40" x 30". To ensure that ants cannot reach anything on top of the plywood, be sure to use a rigid ply that will not bend, warp or touch the ground when in use. Important: use marine plywood for use in outdoor or moist areas.
 - Use 1/2 inch plywood to hold up to a 150 lb. load
 - Use 3/4" plywood for loads up to 250 lbs.
- 2) Be sure the under-surface of the board is clean and dry. To attach the ant proof feet, use the enclosed double-sided self adhesive tape. Peel off the protective cover, attach to the flat side of each ant proof foot, and affix the foot to the under-surface of the platform.
- 3) See illustration for placement tips. For boards up to 16" square, place one AntGuard foot near each corner of the plywood. For larger boards, position the feet farther in from the corners. The bigger the board, the further the feet should be in from the corners to allow for proper weight distribution.

Position your completed ant free / stopper / killing / repelling platform on a flat, hard, clean surface under the item you want to protect such as a garbage can, potted plant, bulk foods, etc. Keep the ant proof platform away from walls and other objects to ensure that ants cannot bypass the ant proof feet and sneak directly onto the top of the platform. Note: if dust or debris collects under the platform, ants may "bridge" directly onto the platform. For best results, avoid placing the device where debris will frequently collect, and sweep dust & debris out from under the platform regularly.

For smaller items, try the AntGuard® Ant Proof Tray. The 10 inch diameter tray requires no assembly and supports up to 50 lbs.

Note: This product has been tested and proven with plywood and marine plywood platforms. We have not tested other potential surfaces. For this reason, we can only guarantee performance on plywood and marine plywood.