

66923-2

8-21-2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 21, 2006

Peter S. Winn
US Agent
Hedley Techonologies (USA) Inc.
202 North Avenue #102
Grand Junction, CO 81501

Subject: Label Amendment – Response per PR Notice 2001-1
Protect-It
EPA Reg. No. 66923-2
Your Submission Dated May 16, 2206

Dear Mr. Winn:

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. Revise Precautionary Statement as follows:

"Cause moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco."
2. Move "Use adequate ventilation and avoid breathing dust. Wear an N-95 dust mask when using this product during prolonged exposure." To Directions For Use section.

3. Revise the pesticide disposal statement to read:

"Wastes resulting from the use of this product may be disposed of on site or at a approved waste facility."

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



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

ACCEPTED
with COMMENTS
In EPA Letter Dated
AUG 21 2006

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

06923-2

DIRECTIONS FOR USE

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

BINS & SILOS - Three steps for optimum stored product protection:

For optimum effectiveness, good quality stored grain or seed should be below 14.5% moisture content with relative humidity at 70% or less. Protect-It® is most effective when given several days to work.

Step 1) Structural Treatment: Clean equipment, structures and empty storage containers before applying Protect-It®. Apply Protect-It® at a rate of 0.6 lb. per 1000 sq. ft. about two weeks before filling storage containers. Treat cracks, crevices and void spaces with a bulb duster or similar applicator. For empty bins and silos, apply Protect-It® through the running aeration fan or use a portable blower to blow it in through an upper hatchway (silos) or lower hatchway (steel bins). For wet application, mix 1 lb. of Protect-It® with 1 gallon of water and spray as a fine mist at the rate of 1.5 gallons per 1000 sq. ft.

Step 2) Grain Treatment: For optimum protection, both the product to be stored or transported and the storage or transportation container or package must be free from insect infestation. If grain is infested prior to use of Protect-It®, no assurance of control is afforded.

Option I - Apply Protect-It® at a uniform rate to the entire grain mass (indicated in the chart to right) as it is transferred by auger or conveyor feeder system; OR

Option III - Using the same application method as in Option I above, treat the bottom 3 feet and the top 3 feet of the grain mass (layer treatment rates indicated in table). Where layer treatment accounts for more than 20% of the total grain mass, treat only the top layer to minimize effects on grain flowability and test weight; OR

Option III - If it is not possible to use layer treatment (e.g., flat storage) or the top 3 foot layer accounts for more than 20% of the grain mass (grain in bins less than 15 feet deep), refer to the FLAT STORAGE directions.

Step 3) Top Dressing Treatment: After filling granary and applying Protect-It® to the grain mass or top layer as indicated in the table, apply 3 lbs. of Protect-It® per 1000 sq. ft. of the grain surface area. To help prevent the entry of insects through the surface of the grain mass in cases where the bin has been filled but the grain has not been treated with Protect-It®, apply Protect-It® to the surface of the grain mass at 40 lbs. per 1000 sq. ft. Contact Hedley Technologies for information on application equipment.

FLAT STORAGE - Two steps to help prevent the entry of insects through the surface of the grain mass:

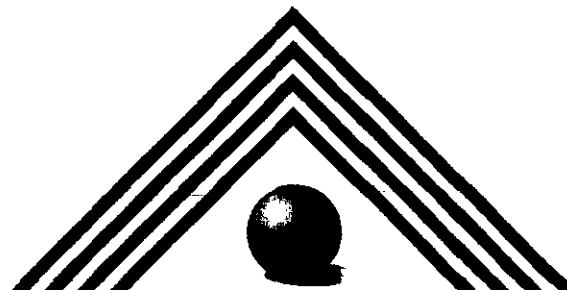
Step 1) Structural Treatment: Clean equipment, structures and storage containers before applying Protect-It®. Use a compressed air or electric blower to apply Protect-It® at a rate of 0.6 lb. per 1000 sq. ft. about two weeks before filling storage containers.

Step 2) Grain Treatment: Load insect free grain. Apply Protect-It® to the surface of the grain mass at 40 lbs. per 1000 sq. ft. Aerate to cool grain.

Warranty Statement: As it's sole express warranty, Hedley Technologies (USA) Inc. warrants that this product conforms to the ingredient statement on this label. This product is reasonably fit for the purposes stated on this label only when used in strict accordance with the Directions for Use set forth on this label. Only as permitted by applicable law, Hedley Technologies (USA) Inc.: (i) in the event of a breach of this limited warranty, shall not be liable for consequential damages and (ii) does not make or authorize anyone to make any warranty of fitness or merchantability, express or implied, concerning Protect-It®.

EPA Reg. No. 66923-2
EPA Est. No. 074816-CAN-001

Patent No. 5,773,017
Printed in Canada 91-US



Protect-It®

Protects Stored Products
from Insects and Insect Damage

Manufactured in Canada for
Hedley Technologies (USA) Inc.

1-888-478-4473 202 North Avenue #102, Grand Junction CO 81501 www.hedleytech.com

ACTIVE INGREDIENTS:

Diatomaceous Earth 90%
Silica Gel 10%

TOTAL 100%

CONTENTS

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes. Use adequate ventilation and avoid breathing dust. Wear an N-95 dust mask when using this product during prolonged exposure.

FIRST AID - If in eyes: hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. 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.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Storage: Store in original container in a dry place. Pesticide Disposal: Wrap container and put in trash collection or dispose in approved facility. Container Disposal: Reuse bags and recycle bags and boxes where possible or place in trash.

Net Weight 15 lbs / 6.8 kg (contents may settle)

How Protect-It® Works: Enhanced Protect-It® contains diatomaceous earth and silica gel. Diatomaceous earth consists of siliceous fossil shells of diatoms, a type of green algae. Protect-It® absorbs the outer waxy layer from the insect, causing dehydration - a physical rather than chemical method of protection against insect infestation. Application rates differ because the rate of dehydration varies depending on the insect species and the type of stored product.

Use Sites: Protect-It® can be used in the stored products listed below and in and around containers, equipment and buildings (structures) where any products are stored, transported or processed, such as, harvesting equipment, augers, bins, silos and elevators, truck trailers, rail cars and ships, bags, cans, drums and other packages, warehouses, food processing plants (including flour mills, bakeries, and egg, meat and poultry plants), pet food plants, feed mills, maintenance buildings, etc.

Protect-It® is approved for use on the following stored products: barley, beans, birdseed mix, corn, oats, peas, peanuts in shell, popcorn, rough rice, rye, sunflower seed, sorghum (milo) and wheat. In addition, Protect-It® can be used in and around equipment, manufacturing facilities and empty storage and transportation containers that may be used for other stored products not specifically listed. Stored products can be used as intended (food, feed, seed and oil) immediately after treatment, without removal of Protect-It®.

Protect-It® is effective against the following stored product insects:

pea weevil	maize weevil	rusty grain beetle	sawtoothed grain beetle
rice weevil	granary weevil	lesser grain borer	Indianmeal moth larvae
grain mites	red flour beetle	confused flour beetle	
bean weevil	flat grain beetle	merchant grain beetle	

Notice: Depending on the type of commodity and the amount of Protect-It® used, test weight and grain handling properties may be affected. To minimize these effects, layer treatment is recommended for affected commodities. Protect-It® is not considered to be a foreign material in treated product and will not cause treated product to be reduced to sample grade as set out in GIPSA/FGIS Program Directive 9180.49, September 1996.

Application Rate Chart: Follow Directions for Use (left column). For grain or seed with moisture content of 12% or lower, reduce rates listed below by 15%.

Commodity	Pest	Option I - Rate for grain mass	Option II - Rate for layer treatment
Wheat	weevils & lesser grain borer	18.0 lbs/1000 bu	24.0 lbs/1000 bu
	all others	18.0 lbs/1000 bu	18.0 lbs/1000 bu
Barley	weevils & lesser grain borer	14.4 lbs/1000 bu	19.2 lbs/1000 bu
	all others	14.4 lbs/1000 bu	14.4 lbs/1000 bu
Oats	weevils & lesser grain borer	9.6 lbs/1000 bu	12.8 lbs/1000 bu
	all others	9.6 lbs/1000 bu	9.6 lbs/1000 bu
Rye	weevils & lesser grain borer	16.8 lbs/1000 bu	22.4 lbs/1000 bu
	all others	16.8 lbs/1000 bu	16.8 lbs/1000 bu
Rough rice	weevils & lesser grain borer	13.5 lbs/1000 bu	22.5 lbs/1000 bu
	all others	13.5 lbs/1000 bu	13.5 lbs/1000 bu
Corn	all listed species	NA	56.0 lbs/1000 bu
	all others	NA	56.0 lbs/1000 bu
Popcorn	weevils & lesser grain borer	NA	54.1 lbs/1000 bu
	all others	NA	42.0 lbs/1000 bu
Sorghum (milo)	all listed species	NA	56.0 lbs/1000 bu
Beans, Peas	all listed species	18.0 lbs/1000 bu	18.0 lbs/1000 bu
Peanuts in shell	all listed species	NA	0.25 lbs/cwt.
Birdseed mix	all listed species	1.0 lb/1000 lbs	NA
Sunflower seed	Indianmeal moth	NA	0.1 lbs/cwt

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