



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

March 22, 2004

William E. Currie
Consultant/Entomologist
Perma-Guard, Inc.
P.O. Box 474
Ash Fork, Arizona 86320

Subject: Amendment- Revision per PR Notice 2001-1 (First Aid), 2001-6 (Storage & Disposal) and 96-6 (Pet Products)
Perma-Guard Household Insecticide
EPA Reg. No. 67197-2
Your Letters Dated October 25, 2003 & October 29, 2003

Dear Mr. Currie:

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. Replace "Wash thoroughly after handling" with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco." in the Precautionary Statements.
2. Add the statement "Food utensils such as teaspoons and measuring cups should not be used for food purposes after use with pesticides" to the Directions for Use section. This was brought to your attention in previous correspondence.
3. Under the Ingredients Statement, replace "Inert Ingredients" with "Other Ingredients"
4. Either delete all "Repeat if necessary", "Repeat treatment if need" and "Repeat if

needed" statements or clarify reapplication limitation based upon residual claims. This also was brought to your attention in previous correspondence.

- 5. Add "Cover mattresses after treatment" to the bedbugs directions.

Note, base on the oral and inhalation acute toxicity of the product (Tox Category IV), you are not required to have an If inhaled nor If swallowed first aid statement. We still have not received a corrected basic confidential statement of formula (CSF) from you as requested in our July 5, 2000 letter. The CSF dated January 5, 1999 is unacceptable. Enclosed is a copy of the chemistry review in regard to this CSF. Please revise and resubmit.

As previously discussed this product is not registered for use on pets. This also applies to distributor products approved under this registration. You may delete these statements if you wish. If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,
BeWanda Alexander for
George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosure

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS (& DOMESTIC ANIMALS)**

CAUTION

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Remove contaminated clothing and wash before reuse.

Environmental Hazards

This product is toxic to fish. Do not apply directly to any body of water. Do not contaminate water by disposing of equipment wash waters. Apply this product only as specified on the label.

STORAGE AND DISPOSAL

Storage - Store in a cool dry place, out of sunlight. Keep container closed. Do not contaminate water, food or feed.

Disposal - Many local governments collect these products.

If Empty: Do NOT reuse this container. Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency for disposal instructions. Never place unused product down ANY indoor or outdoor drain.

WARRANTY STATEMENT

Seller warrants that this product conforms to the ingredient statement on the label. Since conditions of use, such as weather, compatibility with other chemicals, and conditions of application equipment, will vary, seller makes no claims other than those stated on the label.

**BATCH NUMBER
NET WT.**

Bar Code

Manufactured by:
Perma-Guard, Inc.
410 - 12th St., NW
Albuquerque, NM 87102
505 873-3061

EPA Reg. No. 67197-2
EPA Estab. No. 67197-AZ-001

DISTRIBUTED BY:

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

MAR 22 2004

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

67197-2

**PERMA GUARD
HOUSEHOLD
INSECTICIDE**

D-20

**USE WET OR DRY
MULTI-PURPOSE**

For control of: ants, fire ants, bedbugs, box elder bugs, crickets, scorpions, fleas, flies, roaches and silverfish.

ACTIVE INGREDIENTS:

Pyrethrins	0.2%
Technical Piperonyl Butoxide*	1.0%
Silicon Dioxide (from Diatomaceous Earth)	88.0%
INERT INGREDIENTS	10.8%
Total	100.0%

*Equivalent to 0.8% (butylcarbityl) (6-propylpiperonyl) ether and 0.2% related compounds.

KEEP OUT OF THE REACH OF CHILDREN

CAUTION

FIRST AID

Call a Poison Control Center or doctor immediately for treatment advice.

IF SWALLOWED:

- 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 ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.

IF INHALED:

- Move person to fresh air.
- If person is NOT breathing, call 911 or ambulance; then give artificial respiration, preferably mouth to mouth if possible.

IF IN EYES:

- Hold eyes 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.

Have the product container label with you when calling a Poison Control Center or doctor, or going for treatment.

**SEE SIDE PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS.**

10/29/03

DIRECTIONS FOR USE:

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

This product is labeled to be used in and around the home, yard, and animal housing. It can be applied as a dry dust or mixed with water at the rate of 2 ounces per quart and sprayed as a liquid. NOTE: 1 ounce of this product is 8 level teaspoons. The dust does not dissolve, and to help keep it in suspension, add one tablespoon of mild detergent per gallon of water, and agitate the sprayer now and then. With either method, the idea is to coat all areas where bugs may be.

DRY USE INSTRUCTIONS: HOUSEHOLD INSECTICIDE can be applied by the use of any equipment to handle dust or powder, whether it be hand or power operated.

ANTS: Dry Powder: Stir the mound with a rake or other tool, agitating the ants. Apply Perma Guard Household Insecticide dust liberally on the immediate area, contacting as many ants as possible. Repeat if needed for final results. **Wet Application:** Use one-half cup of Perma Guard Household Insecticide with a tablespoon of a mild detergent per gallon of water. Saturate the mound or bed with the entire gallon of mixture. Repeat if necessary.

FIRE ANTS: Dry Powder: For faster knockdown! Stir the fire ant mound with a rake or other tool agitating the ants. Apply Perma Guard Household Insecticide liberally on the immediate area, contacting as many ants as possible. Repeat treatment as needed. **Wet:** Mix four tablespoonfuls to one-half cup of Perma Guard Household Insecticide with a tablespoon of a mild detergent in a gallon of water. Stir the fire ant mound with a rake or other tool to agitate the fire ants. Drench each individual fire ant mound with a gallon of the mixture. Repeat treatment if needed.

BEDBUGS: Take bed apart. Dust directly into all cracks, joints & inside framework, as well as box springs. Dust tufts, folds & edges of mattress. Picture frames, moldings & cracks or crevices in the room must also be treated for best results.

BOX ELDER BUGS, CRICKETS & SCORPIONS: Dust lightly areas around windows, doors & other places where these pests may enter.

FLEAS: Rugs: Make a thin coating on rug. Rake (not sweep) nap back and forth, causing dust to enter rug. Leave overnight. When cleaning do not make special effort to remove dust in rug. It will kill live fleas, repel others, and will deodorize carpet. **Outside Area:** Apply 8 to 16 oz. of dust per 1000 sq. ft. of yard. Two or three applications per year as necessary. This can be done as dry dust or as wettable powder, using suitable equipment.

FLIES: Lightly coat window sills so flies lighting will contact the dust. If the outside walls of the house, shrubbery, outbuildings, such as barns, stables, kennels or corrals are dusted, flies are greatly reduced. Repeat if needed.

ROACHES & SILVERFISH: In most cases general application is not needed, but localized attention to cracks & crevices, under stoves & refrigerators, and in likely hiding places. Be sure to treat around sinks and drain pipes, and if there is an opening into the sewer line, blow a considerable amount of product in the line. Being closed, air pressure forces the dust further down the line, coating the upper half of the pipe, leaving no safe place for roaches. This protection exists as far as the line is coated.

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