

67197-2

05/25/2012

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 25, 2012

William Currie
Perma-Guard, Inc.
625 East 2150 South
Bountiful, UT 84010

Subject: Amendment – Response to Agency’s April 10, 2012 letter
Perma-Guard Household Insecticide D-20
EPA Reg. No. 67197-2
Your submission dated May 4, 2012

Dear Mr. Currie:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 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. Delete the last two paragraphs starting with “This product is highly toxic to bees exposed ...etc” and ending with “... when disposing of equipment wash waters or rinsates” in the *Environmental Hazards* section.
2. Revise the Precautionary Statement to read as follows:

“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 with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet”.
3. Add the sentence “After four hours vacuum the dust from the mattress” after the statement “Dust tufts, folds & edges of mattress” under the *Bedbugs* section.
4. Delete the claim “Multi-Purpose” on the front panel.

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,



Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

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

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

CAUTION

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

Environmental Hazards

This product is toxic to fish. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters or rinsates.

STORAGE AND DISPOSAL

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

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.

BATCH NUMBER
NET WT.

Manufactured by:
Perma-Guard, Inc.
625 E. 2150 S.
Bountiful, UT 84010
(505) 243-1460

EPA Reg. No. 67197-2
EPA Estab. No. 67197-AZ-1

DISTRIBUTED BY:

**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%
Piperonyl Butoxide*	1.0%
Silicon Dioxide (from Diatomaceous Earth)	88.0%
OTHER INGREDIENTS	10.8%
Total	100.0%

*(Butylcarbityl) (6-propylpiperonyl) ether and related compounds.

**KEEP OUT OF THE REACH OF CHILDREN
CAUTION
FIRST AID**

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

IF ON SKIN OR CLOTHING:

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

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.

ACCEPTED

with COMMENTS

In EPA Letter Dated
MAY 25 2012

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 67197-2

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DIRECTIONS FOR USE:

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

Apply this product only as specified on the label. 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. Food utensils such as teaspoons and measuring cups must not be used for food purposes after use with pesticides. 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. Applied into cracks and crevices is useful and effective.

Do not allow adults, children or pets to enter the treated area until sprays have dried or dusts have settled.

Do not apply this product in a way that will contact adults, children or pets, either directly or through drift. Remove pets, birds and cover fish aquariums before spraying.

Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food preparation surfaces, or wash them before use.

Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment and food preparation surfaces, or wash before use.

Do not apply directly into sewers or drains, or in any area like a gutter where drainage to storm sewers, water bodies or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios and structural surfaces (such as windows, doors and eaves) are limited to spot and crack-and-crevice applications only. Not for use in outdoor residential misting systems.

Residential Outdoor Surface and Space Sprays. All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- (1) Treatment to soil or vegetation around structures;
- (2) Applications to lawns, turf and other vegetation;
- (3) Applications to building foundations, up to a maximum height of 3 feet.

Entry Restrictions for Product Applied as a Surface Spray:

Do not enter or allow others to enter until sprays have dried.

Entry restriction for Product Applied Dry:

Do not enter or allow others to enter until dusts have settled.

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. **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.

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