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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

NOV 2 7 2007

Perma Guard, Inc. c/o Mr. William Currie International Pest Management Institute P.O. Box 474 Ash Fork, AZ 86320-0474

Dear Mr. Currie:

Subject: Amendment - marketing split of label into agricultural & home and home garden labels Perma Guard Garden and Plant Protection Insecticide EPA Reg. No. 67197-3 Your submission dated October 4, 2007

The amendment referred to above, submitted in connection with registration under FIFRA

section 3(c)(7(a)), is acceptable and stamped copies of both labels are enclosed for your records.:

Sincerely,

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

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS (& DOMESTIC ANIMALS)

CAUTION: Avoid contact with eyes, skin or clothing. Wear goggles or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Use adequate ventilation and avoid breathing dust.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and other aquatic organisms. Do not apply directly to any body of water. Do not contaminate water by disposing of equipment wash rinses. Apply this product only as specified on this label.

STORAGE AND DISPOSAL

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

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.

PERMA GUARD GARDEN AND PLANT PROTECTION INSECTICIDE CAN BE USED ON HOME GREENHOUSES, YARDS AND GARDENS EVEN ON THE DAY OF HARVEST FOR THE INSECTS LISTED BELOW.

INSECTS (including but not limited to): 12 Spotted Cucumber Beetle, Ants, Aphids, Army Worm, Asparagus Beetle, Blister Beetle, Budworm, Cabbage Looper, Chinch Bug, Colorado Potato Beetle. Corn Earworm, Cross Striped Cabbage Worm, Cut Worms, Diamondback Caterpillar, Diamondback Moth Larvae, Fireworm, Fleas, Flea Beetle, Green Peach Aphid, Harlequin Bug, Hom Worm, Imported Cabbage Worm, Leaf Tier, Leafhoppers, Mexican Bean Beetle, Midges, Mites, Mole Cricket, Mormon Cricket. Other Caterpillars, Pea Curculio, Peach Borer, Pecan Weevil, Range Caterpillar, Stink Bug, Webworm, Whitefly.

CROPS (including but not limited to): Asparagus, Beans, Broccoli, Brussel Sprouts, Cabbage, Cauliflower, Celery, Collards, Corn, Cranberries, Eggplant, Grasses, Lettuce, Mustard Greens, Kale, Peaches, Peanuts, Peas, Pecans, Peppers, Potatoes, Radishes, Soy Beans, Spinach, Tomatoes, Turnips.

ORNAMENTALS (including but not limited to): Acacia, African Violets, Agave, Alyssum, Asters, Azaleas, Beech, Begonias, Birch, Boxwood, Camellias, Carnations, Coreopsis, Cosmos, Chrysanthemums, Daffodils- Dahlian, Daisies, Dogwood, Elm, Eucalyptus, Euonymus, Ferns, Ficus, Foxglove, Geraniums, Gladioli, Hibiscus, Holly, Iris- Juniper, Larksnur, Lilies, Lupine, Marigold, Mesquite, Morning Glory, Nasturitum, Oak, Oleander, Palo Verde, Pansy, Peony, Petunia, Phlox, Pine, Pittisporum, Poinsettias, Poppy, Pyracantha, Roses, Sage, Snapdragon, Sunflowers, Sweet Pea, Tulips, Turferass, Yarrow, Yev, Yucca, Zinnizs; 1

PERMA GUARD GARDEN AND PLANT **PROTECTION NSECTICIDE** D-21 **USE WET OR DRY MULTI-PURPOSE**

This is an effective material for insect control on HOME GREENHOUSES, YARDS, and GARDENS.

ACTIVE INGREDIENTS:

Pyrethrins	0.1%
Technical Piperonyl Butoxide*	1.0%
Silicon Dioxide (from Diatomaceous Earth)	88.5%
INERT INGREDIENTS	10.4%
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 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

BATCH NUMBER



Bar Code

registered under EPA Reg. No.6719

NOV 2 7 2007 Under the Federal Insecticide, Fungicide, and Rodenticide Act. as amended, for the pesticide

Perma Guard, Inc. 410 - 12th St., NW Albuquerque, NM 87102 505 243-1460 ACCEPTED reg. No. 67197-3

Manufactured by:

EPA Est. No. 67197-AZ-001

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product through any type of irrigation system.

DRY APPLICATION: The goal is to get coverage over the entire plant, especially under the leaves. An examination of the leaves will tell if the leaf bottom is covered. For greenhouses, yards and gardens, apply to get light, thorough coverage. With denser growth, it might be necessary to increase the amount.

APPLICATION EQUIPMENT: A good dust applicator is essential, and should be equipped with electronic nozzles, which put a negative charge on the dust. The plant being positive attracts the dust making for a better coverage even on leaf bottom. A hand-held duster or plastic squeeze bottle container with a fine nozzle works well for greenhouses, yards and gardens.

WET APPLICATION: The same rates apply when using PERMA GUARD GARDEN AND PLANT PROTECTION INSECTICIDE AS A WETTABLE POWDER. Adding water is merely a means of using existing spray equipment.

MIXING INSTRUCTIONS:

MINIMUM: 1 lb to 2 gals water.

MAXIMUM: 1 lb to 25 gals water.

The purpose is to get a solution that will flow easily through the nozzle, and still put out the recommended amount of product. It is essential to get coverage on the underside of the leaf.

GREENHOUSE, YARD AND GARDEN PLANTS: The same application instructions apply. Get coverage on top and bottom of leaf. Apply either wet or dry.

APPLICATION EQUIPMENT: A variety of equipment is available, from small hand-held units, backpacks, and tractor equipment; some capable of applying either wet or dry.

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.

DISTRIBUTED BY:



Made in the USA and used worldwide



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS (& DOMESTIC ANIMALS)

CAUTION: Avoid contact with eyes, skin or clothing. Wear goggles or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Use adequate ventilation and avoid breathing dust.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and other aquatic organisms. Do not apply directly to any body of water. Do not contaminate water by disposing of equipment wash rinses. Apply this product only as specified on this label. STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage and disposal. Storage: Store in a cool dry place, out of sunlight. Keep container closed. 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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Personal Protective Equipment: Applicators and other handlers must wear long sleeved shirt and long pants, shoes plus socks, waterproof gloves. Follow manufacturer's instructions for cleaning & maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water are: • Coveralls • Waterproof gloves • Shoes plus socks

INSECTS (including but not limited to): 12 Spotted Cucumber Beetle, Ants, Aphids, Army Worm, Asparagus Beetle, Blister Beetle, Boll Weevil, Boltworm, Budworm, Cabbage Looper, Chinch Bug, Colorado Potato Beetle, Corn Earworm, Cross Striped Cabbage Worm, Cut Worms, Diamondback Caterpillar, Diamondback Moth Larvae, Fireworm, Fleas, Flea Beetle, Green Peach Aphid, Hartequin Bug, Horn Worm, Imported Cabbage Worm, Leaf Tier, Leafhoppers, Maxican Bean Beetle, Midges, Mites, Mole Cricket, Mormon Cricket, Other Caterpillars, Pea Curculio, Peach Borer, Peacan Weevil, Range Caterpillar, Stink Bug, Webworm, Whitefly.

CROPS (including but not limited to): Alfalfa, Asparagus, Beans, Broccoli, Brussel Sprouts, Cabbage, Cauliflower, Celery, Collards, Corn, Cotton, Cranberries, Eggplant, Grains (Wheat, Barley, Oats, Sorghum), Grarsses, Lettuce, Mustard Greens, Kale, Peaches, Peanuts, Pers, Perans, Peppers, Potaces, Radishes, Soy Beans, Spinach, Tobacco, Tomatoes, Tarrilos, Control and Control

ORNAMENTALS (including but rot (initiation) Acadia, African Violets, Agave, Alyssum, Asters, Azaleas, Beech, Begonias, Birch, Boxwood, Camellias, Camations, Coreopsis, Cosmos, Chrysanthemums, Daffodils, Dahlias, Daisies, Dogwood, Em, Eucalyptus, Euonymus, Ferus, Ficus, Foxglove, Geraniums, Gladioli, Hibiscus, HolyyA tris, Juniper, tarkstur, Lilies, Lüpine, Margold, Mesquite, Morning Glory, Nasturtium, Oak, Oleancer, PalQ Verde, Pansy, Peony, Eduvia, Phiox, Pine, Pittispontin, Poinsettias, Poppy, Evracantha, Poses-Sage: Snapd agon Sunflowers, Sweet Pea, Tulips, Tarfgrass-Yarow, Yew, Yucca, Zimias.

PERMA GUARD GARDEN AND PLANT PROTECTION INSECTICIDE D-21

USE WET OR DRY MULTI-PURPOSE

This is an effective material for insect control on FIELD CROPS, COMMERCIAL OR HOME GREENHOUSES, YARDS, and GARDENS.

ACTIVE INGREDIENTS:	
Pyrethrins	0.1%
Technical Piperonyl Butoxide*	1.0%
Silicon Dioxide (from Diatomaceous Earth)	88.5%
INERT INGREDIENTS	10.4%
Total	100.0%

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

KEEP OUT OF THE REACH OF CHILDREN.

FIRST AID

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 minutes.

IF IN EYES:

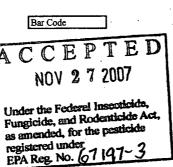
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SEE SIDE PANEL FOR ADDITIONAL

PRECAUTIONARY STATEMENTS

BATCH NUMBER NET WT.



Manufactured by: Perma Guard, Inc. 410 - 12th St., NW Albuquerque, NM 87102 505 243-1460

EPA Reg. No. 67197-3 EPA Estab. No. 67197-AZ-001 PERMA GUARD GARDEN AND PLANT PROTECTION INSECTICIDE CAN BE USED ON FIELD CROPS, COMMERCIAL AND HOME GREENHOUSES, YARDS AND GARDENS EVEN ON THE DAY OF HARVEST FOR THE INSECTS LISTED.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product through any type of irrigation system.

DRY APPLICATION RATES: The goal is to get coverage over the entire plant, especially under the leaves. For young plants, as little as two pounds per acre may be sufficient. For larger plants, five lbs/acre may be necessary. With denser growth, it may be necessary to increase amount. An examination of the leaves will tell if the leaf bottom is covered. For yards and gardens, apply to get light, thorough coverage.

APPLICATION EQUIPMENT: A good dust applicator is essential, and should be equipped with electronic nozzles, which put a negative charge on the dust. The plant being positive attracts the dustresulting in better coverage even on leaf bottom. A hand-held dust or a plastic squeeze bottle container with a fine nozzle works well for yards and gardens.

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DISTRIBUTED BY:

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