



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 31 2003

William E. Currie
Consultant
International Pest Management Institute
P.O. Box 474
Ash Fork, Arizona 86320

Subject: Label Amendment to Update First Aid Statements (PR Notice 2001-1), Storage and Disposal Instructions (PR Notice 2001-6), Pet Products Labeling (PR Notice 96-6), and to Delete "Warm Blooded Animals" Claims

Perma Guard Dogs and Cats Pet Insecticide
EPA Reg. No. 67197-5
Your Submissions Dated October 25 and 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. Under Precautionary statements, add "*Wear goggles or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco*" after the sentence beginning with "*Avoid contact with eyes,...*"
2. Add "*and other aquatic organisms*" to the first sentence under Environmental Hazards.
3. Revise the statement "*Do not contaminate water, food or feed*" to read: "*Do not contaminate water, food, or feed by storage and disposal*". Place the revised statement directly under the heading "Storage and Disposal".
4. Since this product is placed in Toxicity Category IV for the oral and inhalation routes of exposure, First Aid statements for these routes are not required. You may delete the *If swallowed* and *If Inhaled* statements.

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If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,



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

Enclosure

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

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. 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
605 873-3061

EPA Reg. No. 67197-5
EPA Estab. No. 67197-AZ-001

DISTRIBUTED BY:

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

DEC 31 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

67197-5

**PERMA GUARD
DOGS AND CATS
PET INSECTICIDE**

D-20

USE WET OR DRY

This is an effective material for use against FLEAS, TICKS, and LICE on Pet Dogs, Cats, their bedding, premises and runs subject to these parasites.

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.**

DIRECTIONS FOR USE
"READ ENTIRE LABEL BEFORE EACH USE"
**"USE ONLY ON DOGS, CATS, THEIR
BEDDING, PREMISES OR RUNS"**

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

"DO NOT USE ON ANIMALS UNDER 12 WEEKS OLD"

FLEAS, TICKS, AND LICE: Lightly work the material into the hair of the animal. Use brush/comb to work material down to the skin. Pay strict attention to places where the animal cannot reach, such as the scalp. Dust the ears of the animal with care. Individual ticks observed on the animal should be dusted thoroughly. Do not re-apply product for 30 days. *Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing animals or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

ANIMAL BEDDING: Dust the animal's bedding and areas where the animal sleeps, as well as cracks and crevices adjacent to them. Repeat once a month if necessary.

PREMISE APPLICATION: For animals confined to a specific area infested with fleas and ticks, dust the entire area with PERMA-GUARD PET INSECTICIDE.

DRY APPLICATION: Cover the affected area at the rate of 8 oz. to 16 oz. per 1,000 sq. ft.

FOR LARGE APPLICATION AREAS: The use of any hand applicator designed for the purpose of discharging powder will work. If using a small lawn fertilizer spreader, mix equal parts of dry sand with PERMA-GUARD PET INSECTICIDE for even flow. Dust thoroughly the first time and then re-apply every 4 months if necessary.

FOR WET APPLICATION: PERMA-GUARD PET INSECTICIDE can be mixed with water at the rate of 2 ounces per quart of water (one ounce is about 8 level teaspoons). To help keep it in suspension, add one teaspoon of a mild detergent, and agitate the sprayer now and then while applying.

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