



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 11, 2016

Mr. William Currie  
International Pest Management Institute  
P.O. Box 607  
Ash Fork, AZ 86320

Subject: Label Amendment – response to EPA letter dated July 29, 2015  
Product Name: Perma-Guard Dogs and Cats Pet Insecticide D-20  
EPA Registration Number: 67197-5  
Application Date: October 28, 2015  
Decision Number: 512283

Dear Mr. Currie:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Linda A. DeLuise by phone at 703-305-5428, or via email at [deluise.linda@epa.gov](mailto:deluise.linda@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Gebken", written in a cursive style.

Richard Gebken  
Product Manager 10  
Invertebrate & Vertebrate Branch 2  
Office of Pesticide Programs

Enclosure

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

**CAUTION**

**HAZARDS TO HUMANS**

Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap and water after handling, and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

**HAZARDS TO DOMESTIC ANIMALS**

Consult a veterinarian before applying this product on medicated, debilitated, aged, pregnant or nursing animals. Certain medicines can interact with pesticides. Consult a veterinarian before using on medicated animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Mixers, loaders, applicators, and other handlers must wear the following: Long-sleeved shirt; Long pants; Shoes and socks; and Chemical-resistant gloves made of any waterproof material.

**USER SAFETY REQUIREMENTS**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

**USER SAFETY RECOMMENDATIONS**

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**PERMA GUARD  
DOGS AND CATS  
PET INSECTICIDE**

**D-20  
USE DRY**

*This is an effective material for use against FLEAS, TICKS, and LICE on Pet Dog and Cat bedding, premises and runs that harbor or contain these parasites.*

**ACTIVE INGREDIENTS:**

Pyrethrins .....	1.0%
Piperonyl Butoxide* .....	1.0%
Silicon Dioxide (from Diatomaceous Earth) .....	88.0%
Other Ingredients .....	10.0%
Total.....	100.0%

\*(butylcarbityl) (6-propylpiperonyl) ether and related compounds.

**ENVIRONMENTAL HAZARDS**

This product is toxic to aquatic organisms, including fish and invertebrates. Drift and run-off may be hazardous to aquatic organisms in water adjacent to treated areas. This product may contaminate water through run-off. This product has a potential for run-off for several weeks after application. Poorly draining soils and soils with shallow water tables are more prone to produce run-off that contains this product.

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, or to areas where surface water is present or to intertidal areas below the mean water mark. Do not contaminate water when disposing of equipment wash-waters or rinsate.

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

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns, you may call 1-800-222-1222, twenty-four (24) hours per day, seven (7) days per week.

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.

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

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage and disposal.

**Pesticide Storage** - Store in original container in a cool dry (preferably locked) area out of direct sunlight, in a place that is inaccessible to children and pets.

**Pesticide Disposal** - Wastes resulting from use of this product may be disposed of on-site or at an approved waste disposal facility.

**Container Disposal - 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.

2/03/2016

**ACCEPTED**

**02/11/2016**

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 67197-5

## DIRECTIONS FOR USE

### “READ ENTIRE LABEL BEFORE EACH USE”

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

#### USE RESTRICTIONS

- Do not contaminate food or feedstuffs.
- Apply this product only as specified on the label.
- Not for use in outdoor residential misting systems (indoor or outdoor).
- **DO NOT APPLY DIRECTLY TO COMPANION ANIMALS/PETS (dogs, cats, puppies or kittens).**
- **USE ONLY ON DOG AND CAT BEDDING, PREMISES OR RUNS.**
- Do not make applications during rain.
- Do not use in aircraft cabins.
- Dust formulations: Aerial applications are prohibited. Applications with power duster equipment are prohibited. Only apply as a spot treatment to areas no greater than 3 feet by 3 feet per room.
- Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use.
- Do not enter or allow others to enter until dusts have settled.
- Do not enter or allow others to enter into the treated areas during the restricted entry interval (REI) of 12 hours.
- 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 treated area during application.
- Do not remain in treated area. Exit area immediately and remain outside the treated area until dusts have settled.
- Do not water the treated area to the point of run-off.
- Application is prohibited directly into sewers or drains, or to 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.
- Remove pets, birds, and cover fish aquariums before use.

The maximum PBO rate for indoor crack and crevice spray is 0.56 lbs. PBO per 1,000 square feet.

**FLEAS, TICKS, AND LICE:** Apply this product only to dog and cat bedding, premises, or runs. Do not apply directly to companion animals (pets) such as dogs, cats, puppies, or kittens..

**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**. Do not allow adults, children or pets to enter until dusts have settled. Do not enter or allow others entry into treated areas during the restricted entry interval (REI) of 12 hours. Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food preparation surfaces or wash them before use.

**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. Applications with power duster equipment are prohibited. Dust thoroughly the first time and then re-apply every 4 months if necessary.

#### 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.

Manufactured by:

Perma-Guard, Inc.  
60 No. Cutler Dr., Unit 202  
North Salt Lake, UT 84054  
(505) 243-1460

Bar Code

EPA Reg. No. 67197-5  
EPA Estab. No. 67197-AZ-1

DISTRIBUTED BY: