

82123-1

06/27/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. John Wright
Agent for Allergy Technologies, LLC
c/o Product and Regulatory Associates, LLC
P.O. Box 1683
Voorhees, NJ 08043-9998

JUN 27 2013

Dear Mr. Wright:

Subject: Label Amendment- expand marketing claims
Active Guard™ Mattress Liner
EPA Registration Number 82123-1
Your submission dated April 5, 2013

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Change "Kills dust mites and bed bugs in bedding (mattress, air mattress, box spring, sofa bed, etc...)" to Kills dust mites and bed bugs in bedding (mattress, air mattress, box spring, and sofa bed".

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

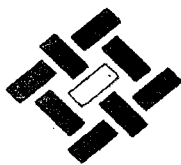
A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure

Front panel:

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ActiveGuard™ Mattress Liner

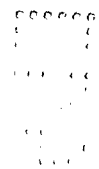
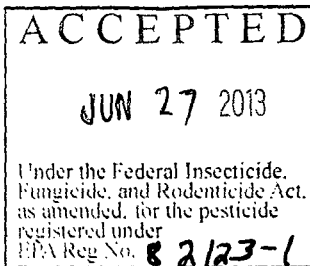
[Marketing Claims (Use appropriate ones)]

- Kills dust mites and bed bugs in mattresses
- Kills dust mites and bed bugs in bedding (mattress, air mattress, box spring, sofa bed, etc...)
- Kills dust mites in mattresses
- Kills dust mites in mattresses which may be a source of home allergens
- Kills dust mites in mattresses
- ActiveGuard™ is fatal to dust mites
- Kills dust mites in mattresses for up to 2 years
- Dust mites in the home live in mattresses
- Dust mite allergens may cause allergies in humans
- Dust mites live and breed in mattresses
- Fits mattresses up to 14 inches deep
- Kills bed bugs in mattresses
- ActiveGuard™ is fatal to bed bugs
- Kills bed bugs in bedding (mattress, air mattress, box spring, sofa bed, etc...)
- Bed bug bites can be itchy and painful and may cause allergic reactions
- Kills bed bugs in product for up to two years
- Use as a bed bug preventative tool as part of an integrated control program
- Outlasts the bed bug life cycle
- Kills bed bugs for up to two years
- Useful as a long term control of adult bed bugs and their juvenile instars
- Helps stop a bed bug infestation before it is established when used as part of an integrated control program.
- Helps prevent new bed bug infestations
- Mattress Liners for Bed Bugs & Dust Mites
- Tough and Durable
- Easy, one-person installation
- Made in the United Kingdom

February 25, 2013 – amended 3-27-13
SAL Mar12 2013

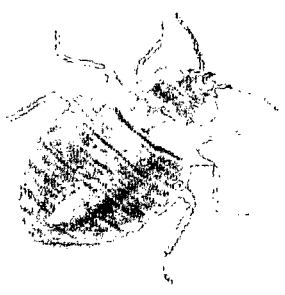
82123-1 Label

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- Ready-to-Use
- Convenient
- Effective
- Easy Care
- Unscented [No odor]
- No unpleasant scent [odor]
- Odorless
- Manufactured [made] with ActiveGuard™ Technology

[Format pictures with line through them – implying that we kill the pests]



[Placeholder for picture of product]

- Impregnated Liner:
 - Soft and Comfortable
 - Completely Odorless
 - Easy to use

ACTIVE INGREDIENT: Permethrin 1.64%
 OTHER INGREDIENTS: 98.36%
 100.00%

READ THE DIRECTIONS FOR USE AND PRECAUTIONS ON BACK PANEL.
 Retain This Package Label or a Copy of the Label for Future Reference on Proper Handling of
 This Mattress Liner.
 EPA Reg. No. 82123-1
 NET CONTENTS: xxx oz.

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82123-1 Label

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[Bedding Size: Single/Twin - 75 x 38 x 14 inches,
Double/Full - 75 x 64 x 14 inches,
Queen – 80 x 60 x 14 inches,
King- 80 x 74 x 14 inches]

[Bulk Roll - Mattress Liner Size: L x W x H]
For Bed Bugs: [Travel Version]

Back panel:
ActiveGuard™ Mattress Liner

Use ActiveGuard™ Mattress Liner on bedding, e.g. mattress, air mattress, box spring, sofa bed, etc.

Apply to bedding with mattress pad and top sheet.

Kills dust mites [*and* bed bugs] in bedding.

[Format pictures with line through them – implying that we stop kill the pests]

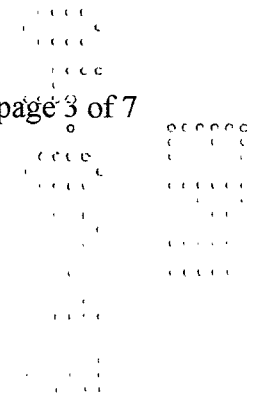


ActiveGuard™ Mattress Liners, manufactured with patented ActiveGuard™ Technology, are soft, comfortable, completely odorless and easy to use.

DIRECTIONS FOR USE

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

Apply on bedding, e.g. mattress, air mattress, box spring, sofa bed, etc.



[For both dust mite and bed bug]

Fit the ActiveGuard™ Mattress Liner over the bedding. Pull down on the edges of the liner to insure a tight fit against bedding. Place another surface such as mattress pad, barrier encasement or bottom sheet over the mattress liner.

If the liner is installed for house dust mites: after eight (8) weeks remove the ActiveGuard™ Mattress Liner and vacuum your bedding thoroughly while ventilating the room. Removing the liner to vacuum the bedding is not required for liners installed for bed bugs. For best results, use new filters and fresh bags in your vacuum cleaner. If you suffer from dust mite induced allergies, have someone else vacuum your mattress.

Re-apply the ActiveGuard™ Mattress Liner on your bedding immediately, and then leave the mattress liner undisturbed for two (2) years. No need for further removal or vacuuming.

Note: Washing the ActiveGuard™ Mattress Liner removes the active ingredient and reduces the effectiveness of the product against dust mites and bed bugs.

Follow the above directions for re-applying or fitting a new mattress liner.

For best results, replace with a new ActiveGuard™ Mattress Liner every 18 months.

Note: Wash hands immediately after applying or fitting the ActiveGuard™ Mattress Liner.

PRODUCT RANGE

ActiveGuard™ Mattress Liners come in a range of sizes to accommodate most standard mattress sizes - (Single/Twin, Double/Full, Queen and King).

[For beg bugs only]

[Fitted Liner] [Traveler Version]

Fit the ActiveGuard™ Mattress Liner over the bedding. Pull down on the edges of the liner to insure a tight fit against the bedding. Place another surface such as mattress pad, barrier encasement or bottom sheet over the mattress liner.

Note: Washing the ActiveGuard™ Mattress Liner removes the active ingredient and reduces the effectiveness of the product against bed bugs.

PRODUCT RANGE

ActiveGuard™ Mattress Liners come in a range of sizes to accommodate most standard mattress sizes - (Single/Twin, Double/Full, Queen and King).

[Bulk Roll]

Cut sheet to match the bedding size. Secure the mattress liner label to the sheet, e.g. stapling, permanent glue, etc. Fit the ActiveGuard™ Mattress Liner over the bedding. Secure down the edges of the liner to insure a tight fit against the bedding. Place another surface such as mattress pad, barrier encasement or bottom sheet over the mattress liner

Note: Washing the ActiveGuard™ Mattress Liner removes the active ingredient and reduces the effectiveness of the product against bed bugs.

STORAGE AND DISPOSAL

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

STORAGE: Prior to installation, store product in a cool, dry place away from direct sunlight.

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. Discard used mattress liner in trash.

NOTICE: Buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

Contact InfoTrac at 1-800-535-5053 for emergency medical treatment information.

U.S. Patents 5,916,580, 6,214,365, 6,440,438 and pending patents

ActiveGuard and logos are trademarks of Allergy Technologies LLC, © 2013 Allergy Technologies LLC

EPA Est. No. 083228-GBR-001

Manufactured for Allergy Technologies LLC.

124 South Maple Street

Ambler, PA 19002

UPC Code

Size:

Mattress Liner Label

This label is to be attached to the ActiveGuard™ Mattress Liner.

[For Dust Mites]



ActiveGuard™ Mattress Liner

Active Ingredient:
Permethrin
1.64% w/w

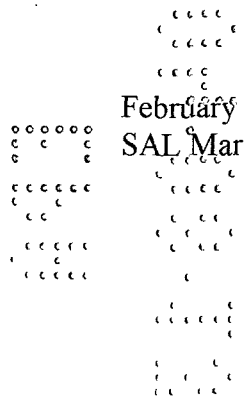
EPA Reg. No.
82123-1
EPA Est. No.
083228-GBR-001

See package label for complete directions and precautions for use.

Kills bed bugs and dust mites in mattresses for up to two (2) years.

Date first fitted to
bed ----/----/----

Discard used mattress liner in trash.



February 25, 2013 – amended 3-27-13
SAL Mar 12 2013

82123-1 Label

[For Bed Bugs]



ActiveGuard™ Mattress Liner

Active Ingredient:
Permethrin
1.64% w/w

EPA Reg. No.
82123-1
EPA Est. No.
083228-GBR-001

See package label for complete directions and precautions for use.

Kills bed bugs in product for up to two (2) years.

Date first fitted to
bed ----/----/----

Discard used mattress liner in trash.

