

11/4/2009

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83122-1



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

NOV - 4 2009

Dear Dr. Todd:

Subject: Label amendment- per Agency letter dated March 24, 2009
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submission dated August 21, 2009

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. As requested in the Agency letter dated March 24, 2009 item 3b, please qualify the bed bug claim as follows: "Kills bed bugs that remain in contact with treated ...for at least 24 hours."

A copy of a stamped label is enclosed for your records.

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

Sincerely yours,

Richard Gebken
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

◆ **FOUR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON & AROUND BEDS**

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle.

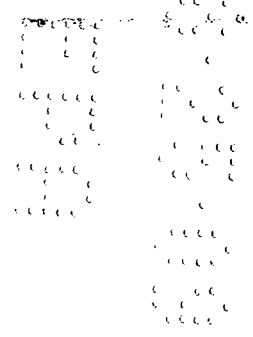
3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing.

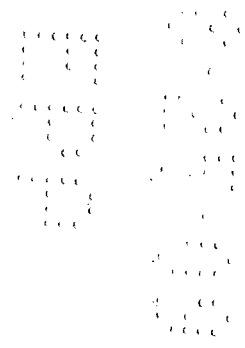
4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector.

NOV - 4 2009
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 83122-1



- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector]
- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak
- ◆ Treated fabric has no odor and is washable up to 20 times
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds
- ◆ "New" (for allowable time frame)
- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] . Insecticidal (killing) action remains effective for up to 20 washings.
- ◆ Kills bed bugs between your box spring and mattress – *(for box spring protector and dust ruffle only)*



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Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

**PRO-TEK 50
Fabric/Apparel (Garment) Treatment**

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

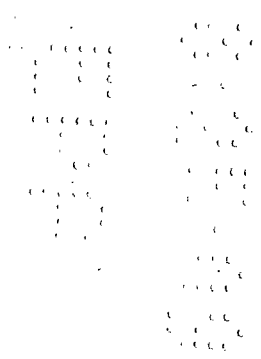
Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554



DIRECTIONS FOR USE

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

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

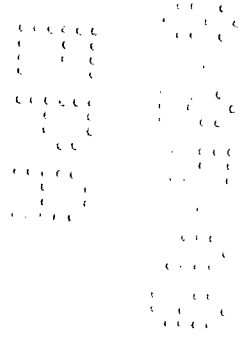
Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

Storage and Disposal

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

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]



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Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

