

83122-1

6/1/2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

JUN - 1 2010

Dear Dr. Todd:

Subject: Label amendment- clarify Directions for Use
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submission dated April 27, 2010

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

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,

f Richard Gebken
Product Manager (10)
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)

SIX 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 for at least 24 hours.

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 for at least 24 hours.

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 for at least 24 hours.

4. Box Spring Protector

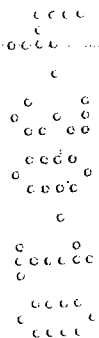
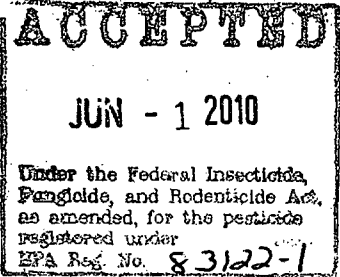
Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

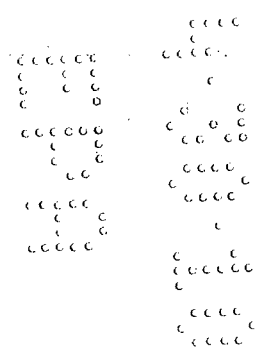
Place under mattress pad between mattress and box spring and secure with elastic bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours. If no box spring, use under mattress pad that does not have bands.

6. Under Furniture Pad

Place under furniture pad underneath item of furniture and secure. Kills bed bugs that remain in contact with treated under furniture pad for at least 24 hours.



- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] [under mattress pad] [under furniture pad] for at least 24 hours
- 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 for at least 24 hours
- "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] for at least 24 hours. Insecticidal (killing) action remains effective for up to 20 washings.
- Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress, or under mattress if no box spring - *(for box spring protector, under mattress pad and dust ruffle only)*
- Kills bed bugs that stay in contact with under furniture pad for at least 24 hours.



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 %

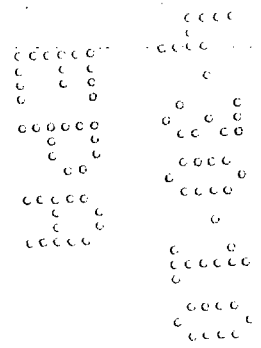
Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item each package



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.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps. If no box spring lay strapless under mattress pad on surface directly beneath mattress.

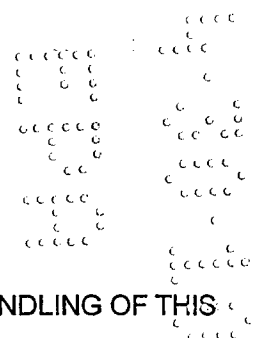
6. Under Furniture Pad

Place pad under furniture and secure as directed.

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.]



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 that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]

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

[Repellency remains
effective
through 25 washings]

———— (fold line) ————

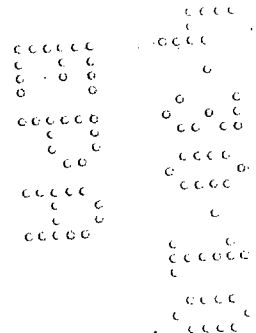
Active Ingredient:
Permethrin 0.52 %

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

Discard in Trash.

Wash separately.

Refer to insert for more
information.



Label for Dog Bandanas

NEW

Master Label Pro-Tek 50 Fabric (including Dog Bandana)

PRO-TEK 50 DOG BANDANA

The Pro-Tek 50 Bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50** that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To protect your dog, a product that provides complete body protection must be used.

Repellency remains effective for 25 washings.

Repellency to mosquitoes remains effective for 6 months of exposure to weathering if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

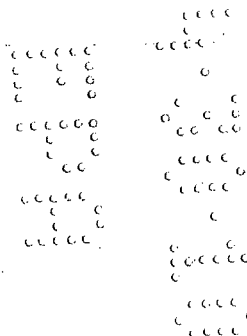
Net Contents: one item each package

Active Ingredient:

Permethrin	0.52 %
Other Ingredients:	<u>99.48 %</u>
Total	100.00 %

Manufactured by:

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554



NEW

DIRECTIONS FOR USE

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

Wrap bandana around dog's neck, making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat Pro-Tek 50 Dog Bandanas with other permethrin insect repellent products.

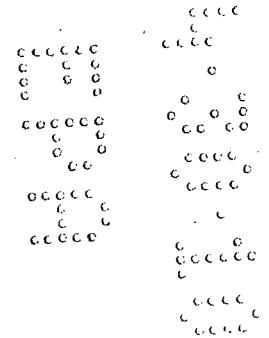
Wash ProTek 50 Dog Bandanas separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

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

Disposal: Discard in trash. Do not reuse.

[RETAIN FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. NOT TO BE REMOVED EXCEPT BY CONSUMER.]



NEW

Master Label: Pro-Tek 50 Dog Bandana

Hang tag sewn on bandana:

PRO-TEK 50 Dog Bandana

Do Not Dry Clean

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

[Repellency remains
effective
through 25 washings; or
for six months if left unwashed]

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Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to label for more
information.

