

83122-1

8/3/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AUG - 3 2011

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

Dear Dr. Todd:

Subject: Amendment- addition of IPM statement and two bed bugs products and California new language
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submissions dated April 27, May 12, and July 6, 2011

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. On page 2 start a new bullet "If this product Pro Tek 50 Fabric/Apparel (Garment) Treatment Treated fabric does not fit...Do not dry clean."

2. On page 5 change "DIRECTIONS FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS" to "FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS".

3. On page 6 change "Place items to be protected from bed bugs directly in <storage> [or] <travel bag>." to "Place items to be protected from bed bugs directly in <permethrin treated storage> [or] <permethrin treated travel bag>."

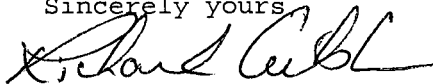
4. On page 7 delete "Use in Integrated Pest Management Program".

5. On page 7 change "This product alone is not intended as a complete solution to bed bug infestations, but for use with other products and methods, as listed on the main label." to "This product alone is not intended as a complete solution to bed bug infestations, but for use with other products and methods, such as those listed on the main label."

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 (10)
Insecticide Branch
Registration Division (7504P)

Enclosure

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

EPA Reg. No. 83122-1

{Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS). The following statements are product descriptors describing each sub-label and are not required language for product labels.}

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). 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 flat, bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Treated 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 pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. 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. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Fabric

Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.

ACCEPTED
COMMENTS
EPA Letter Dated
AUG - 3 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 83122-1

{The following bullets are optional product claims}

- ◆ Kills bed bugs that <live> <remain><stay> in contact with [treated]< this product><bed band><dust ruffle><headboard backing><box spring protector><under mattress pad><under furniture fabric/decking><storage or travel bag><fitted under mattress pad><bandana> for at least 24 hours. <Treated fabric><This product> <has no odor> <is odorless>. <Pro-Tek 50 Fabric/Apparel (Garment) Treatment><This product> is washable up to 20 times If <This product><Pro-Tek 50 Fabric/Apparel (Garment) Treatment ><Treated fabric> does not fit in standard washer wipe then clean with damp cloth or sponge or have it professionally washed. Do not dry clean.
- ◆ 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> <hide> in contact with < Pro-Tek 50 Fabric/Apparel (Garment) Treatment ><treated> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture pad> <storage or travel bag> <fitted under mattress pad> for at least 24 hours.
- ◆ <Insecticidal> <killing> action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with Pro-Tek 50 Fabric/Apparel (Garment) Treatment under furniture fabric for at least 24 hours

{For box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only:}

- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours [between your box spring and mattress]–

{The following bullets are optional bed bug facts}

- ◆ 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

This product alone is not intended as a complete solution to bed bug infestations, but for use **with other products and methods for killing or preventing them. A partial list of such products and methods is given below.**

- **check second hand furniture and bedding for bed bugs before bringing them home**
- **when travelling, keep luggage up on luggage racks, check hotel beds and head boards for bed bugs**

- upon return from travel, unpack and place clothes directly into washer, then dryer
- reduce clutter at home
- heat smaller infested articles to 113^o for 1 hour
- freeze smaller articles at 0^o F for 4 days
- place interceptor traps under bed legs
- encasements around mattresses and box springs
- wash and dry bedding items (but not Pro-Tek products)
- insecticidal sprays labeled for killing bed bugs

60012

{Insert into package of Apparel/Fabric or hang-tag. Note: 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.

{Following claims are for treated fabric, apparel or garments}

<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.>

{Following two claims are for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers and other non-washable items}

<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.>

<Repels mosquitoes for 6 months of outdoor exposure to the elements.>

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:	<u>99.48 %</u>
Total	100.00 %

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

Net Contents: one item in 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><apparel><garment> with other permethrin insect repellent products. [For repellency protection of exposed skin, use with insect repellent approved for 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}

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, if item fits in washer. If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

{DIRECTION FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS}

{For Bed Band}

<Stretch><Position> Bed Band around <sides><edges> of mattress and secure tightly using [the Velcro® or other] closures provided. Band wraps around all four sides of the mattress. Bed band should be placed around <sides><edges> of mattress before bed is made and sheet is placed on mattress. Sheet should cover bed band so that band does not contact person lying on bed.

{For Bedskirt or Dust Ruffle}

Remove mattress. Place [fabric] over top of box spring or foundation so that it entirely covers it, with the <skirt><dust ruffle> draping around all four sides. Replace the mattress on top of the covered box spring or foundation. [The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.]

{For Headboard Backing}

Remove headboard and place on floor, <front side><face> down. Attach [treated] backing to back of headboard by tacking, stapling or with glue. With treated backing towards wall, reattach headboard to bed or hang on wall at head of bed as appropriate.

{For Box Spring Protector}

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

{For Under Mattress Pad}

Remove mattress. Place pad on box spring and secure with straps. Replace mattress over box springs. If bed does not have box springs, lay pad directly on foundation, without use of straps provided. Replace mattress on box spring or foundation.

80912

{For Under Furniture Fabric}

Place or secure under furniture fabric under furniture or underneath upholstery cover.

{For Storage or Travel Bag}

Place items to be protected from bed bugs directly in <storage> [or]<travel bag>.

{For Fitted Under Mattress Pad}

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. Use elastic gathered corners to secure pad to mattress. Place mattress cloth side down on the box spring or bed platform.

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> <FABRIC><PRODUCT>.>
<THIS INSERT IS][NOT TO BE REMOVED EXCEPT BY CONSUMER.>]

{Label (small tag) sewn into washable fabric}

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

Do Not Dry Clean

{For bed bug products}
Kills Bed Bugs that stay in contact
for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings.
Use in Integrated Pest Management program

{For fabric/apparel/garments}
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.

***This product alone is not intended
as a complete solution to bed bug infestations,
but for use with other products and
methods, as listed on the main label.***

100A12

• **Label for Dog Bandanas**

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

DOG BANDANA

This bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50** Fabric/Apparel (Garment) Treatment 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. To protect your dog, a product that provides complete body <protection><coverage> must be used.

Repellency remains effective for 25 washings or 6 months 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:
Gamik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

110412

DIRECTIONS FOR USE {for Pro-Tek 50 Fabric/Apparel (Garment) Treatment dog bandana}

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. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat this bandana with other permethrin insect repellent products.

Wash this bandana 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 THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. [THIS INSERT IS] NOT TO BE REMOVED EXCEPT BY CONSUMER.]

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{tag sewn on bandana}

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

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.

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

Active Ingredient:
Pennethrin 0.52 %
PA Reg. No. 83122-1
EPA Est. No. 0840978-CHN-001
Discard into trash.
Wash separately.
Refer to full label for more
information.