

Efficacy Review

Date: October 8, 2009

Efficacy Reviewer: Clayton Myers, RD-IB
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RM Label Reviewer: Melody Banks

Product: Bora-Care[®] One Step

EPA Reg. #: 64405-RN

A.I.'s: Disodium Octaborate Tetrahydrate (23%) “concelution”

Decision #: 409094

DP #: 365150

MRID: Cited: 45841201, 45841202, 45841203, 45867401, 45867402, 46306701, 46753001, 46753002, 46753003, 46753004, 46753005, 46753006, 47020601, 47020602, 47020603, 47257501, 47257502, 47257503, 47257504, 47306701

GLP: No

Entomologist's Observations/Discussion:

Studies and data submitted in support of the original Bora-Care[®] were cited in support of this ready-to-use product. Because the rates of a.i. applied are equivalent for all the application directions and pests, all insect efficacy claims present on the original 64405-1 label are applicable to the same equivalent claims on this newly submitted product label. Therefore, all insect claims for 64405-RN are supported for this registration.

It should be noted, however, that there are two instances where the rates are not equivalent on the new 64405-RN label when compared to the original 64405-1 label.

1. On page 19, under section H. “Fogging application.” The application of a 9% solution via a fogger is delivering less a.i. to the confined space than what is directed on the original 64405-1 product, which directs the user to fog with a 16% a.i. solution. The use directions on the 64405-RN label should be modified so that the same amount of a.i. is delivered via fog, either by changing the dilution directions, by directing to apply a larger amount of

fog, or by directing the user to make 2 applications for all scenarios.

2. On page 16, under section XVI, for mold and rot control, mixing 1 gallon of 64405-RN with 5 gallons of water (as indicated) will not deliver the same dosage of a.i. as mixing 1 gallon of 64405-1 with 5 gallons of water (as indicated on the 64405-1 product label). Because this claim is for protection against fungal/bacterial infection, efficacy requirements do not necessarily apply, but the registrant should be encouraged to modify the use directions so that the same equivalent amount of a.i. is applied using the One Step formulation in comparison to the original 64405-1 formulation