



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 26, 2019

Mary Hunt
Agent for Nouvel Sales, LLC
c/o Exponent
1150 Connecticut Ave., NW
Suite 1100
Washington, DC 20036

Subject: PRIA Label Amendment – Addition of pre-filled bait station as sublabel C.
Product Name: Nouvel Sales Fipronil Roach Bait Gel
EPA Registration Number: 92028-4
Application Date: December 14, 2018
Decision Number: 548283

Dear Ms. Hunt:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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EPA Reg. No. 92028-4
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with FIFRA section 6. If you have any questions, please contact Jennifer Gaines at 703-305-5967 or via email at gaines.jennifer@epa.gov.

Sincerely,

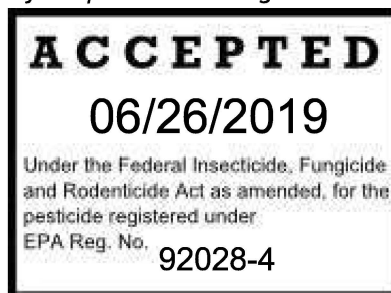


Catherine Aubee, Chief
Invertebrate-Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

{Text in brackets and italics are notes to the label reviewer.}
[Text in brackets alone are optional statements or alternative statements.]

{MASTER LABEL – Unless otherwise noted, all text shown prior to the start of sub-label A will be present on all sub-labels: sub-label A, sub-label B and sub-label C when final printed labeling is prepared.}



{Alternate Brand Names:}

- AttraMaxx Roach Gel & Bait
- Roach Slayer Gel & Bait
- Pestex Roach Gel & Bait

NOUVEL SALES Fipronil Roach Bait Gel
 {FOR COMMERCIAL USE, Sub-Label A
 FOR CONSUMER/HOMEOWNER USE Sub-Label B
 RTU BAIT STATION Sub-Label C}

ACTIVE INGREDIENT:

Fipronil* 0.05%

OTHER INGREDIENTS: 99.95%

TOTAL: 100.00%

*CAS Number 120068-37-3

Manufactured for:
Nouvel Sales, LLC
3901 Sunrise Drive
Rowlett, TX 75088

EPA Reg. 92028-4
EPA Est. No: _____
Net Weight: _____
Batch No. [or Lot Code]:__

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID	
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including general health concerns or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 8:00 AM to 12:00 PM Pacific Standard Time [or registrant’s number]. For medical emergencies, call the poison control center at 1-800-222-1222 [or registrant’s number].</p>	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC NIMALS

CAUTION: Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment where a possibility of shock hazard exists

{SUB-LABEL A: COMMERCIAL USE}

DIRECTIONS FOR USE

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

Use NOUVEL SALES Fipronil Roach Bait Gel as a spot or crack and crevice treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments, including warehouses, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, apartment buildings, bakeries, beverage plants, breweries, bottling facilities, candy plants, canneries, cereal processing and manufacturing plants, dairies and dairy product processing plants, frozen food plants, schools, laboratories, computer facilities, sewers, aircraft, buses, boats/ships, trains, homes, houses, industrial buildings, office buildings, kennels, kitchens, manufacturing facilities, spice plants, stores, wineries and similar structures, mausoleums, meat processing and packaging plants, meat and vegetable canneries, pet shops, and zoos. Non-food/non-feed areas include bedrooms, living rooms, bathrooms, closets, media rooms, garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling). This product may also be used in food/feed areas of food/feed handling establishments as outlined below.

[in the non-food/non-feed areas of institutional, warehousing and commercial establishments, including warehouses, restaurants (non-public areas), food processing plants (including meat or vegetable processing plants or canneries), supermarkets (non-public areas), hospitals (non-public areas), laboratories, computer facilities, sewers, animal housing facilities (such as but not limited to poultry houses, cattle, sheep, swine, goat and dairy facilities, horse stables, dog kennels). Non-food/non-feed areas are areas such as garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).]

Product may stain textiles, fabrics, and or porous surfaces.

USE RESTRICTIONS:

- USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS.
- Do not treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- Do not apply bait gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.
- Place bait out of reach of pets and zoo animals.

APPLICATION DIRECTIONS

Application rate for all uses: Application rate varies according to the level of infestation and species to be controlled. Apply gel as round spots or thin beads into cracks and crevices or as a spot treatment. Place bait close to cockroach harborages, foraging, and feeding areas such as corners and cracks and crevices. Numerous smaller bait placements provide faster control than fewer larger placements. Use the highest rate of application in cases of severe infestation and areas with excessive clutter or alternative food sources that cannot be eliminated.

German Cockroaches, Brown Banded Cockroaches, and stored product pests: For use in maintenance programs where regular [monthly] [quarterly] applications are made for continuous control of cockroach populations, use 0.75 grams of bait per square yard. This rate will not provide fast control of existing infestations. For light to moderate infestations (or for retreatments), use up to 1.5 grams of bait per square yard. To clean out severe or heavy infestations, use up to 3.0 grams of bait per square yard.

Large Cockroaches such as American, Smokey-Brown or Oriental: 1 to 2 grams of bait per square yard.

BAIT QUANTITY REFERENCE TABLE	
Approximate weight per spot diameter	Approximate weight per bead length
0.1 gm = 1/4 inch diameter spot	1/3 gram = 1.5-inch bead
1.0 gm = Dime size spot	2/3 gram = 3.0-inch bead
1.5 gm = Quarter size spot	1 1/3 gram = 6-inch bead

Place bait under baseboards, sinks, countertops, seats, around water pipes, water heaters, dishwasher equipment, in crack and crevices as well as voids where insects harbor.

PANTRY PESTS: To control exposed, adult stages of beetles: cadelle, cigarette beetle, confused flour beetle, dermestid, drugstore beetle, flat grain beetle, granary weevil, lesser grain borer, lesser mealworm, mealworm, merchant grain beetle, red flour beetle, rice weevil, rusty grain beetle, saw-toothed grain beetle, spider beetle, or warehouse beetle. Applications of this product will kill adult stages of beetles remaining in area after removing infested foodstuffs and cleaning up spilled foodstuffs and dust. Apply in voids, cracks and crevices, behind and under cupboards, and other difficult to reach areas where insects may hide. Application rate is dependent on level of infestation.

Applications in Food/Feed Handling Establishments: Application within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment only. If gel contacts an exposed surface where food is handled, remove gel and wash exposed surface with an effective cleaning compound followed by a potable water rinse prior to use. Apply with bait injector directly into cracks and crevices. Place applicator tip 1/2 inch into cracks, crevices, holes and other small openings where roaches may be a problem. Apply small amounts of gel.

Use Restrictions in Food/Feed Handling Establishments:

- Do not apply bait to areas where food/feed, utensils, or processing surfaces may become contaminated.
- Do not apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation, and prepared food holding surfaces as bait may be removed by washing.
- Do not apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- Do not deposit gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface.

Food/feed areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas are also considered a food/feed area when food is exposed and facility is in operation. Apply bait in small amounts between different elements of construction, between equipment and floors, openings leading into voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, behind and under refrigerators, cabinets, sinks, closets, stoves, and other equipment where cockroaches hide. During follow-up visits inspect bait placements and reapply when necessary.

Application of this product in food/feed areas of food/feed handling establishments other than as a crack and crevice treatment is not permitted.

Gel placements should be at or near harborages or aggregation areas, such as corners or cracks and

crevices. Numerous smaller placements will provide faster control than fewer larger spots, especially for German cockroach control.

For outdoor use (adjacent to home -or- structure): Place bait in areas adjacent to structures where roaches may nest or breed. Apply bait to potential points of insect entry, such as eaves, sills, and expansion joints. Apply bait in protected areas whenever possible. Environmental stresses such as direct sunlight and water will reduce the residual effectiveness. Priority treatment areas may be identified by visual inspection of such areas listed above or aided by trapping techniques or spot flushing.

Refillable stations: NOUVEL SALES Fipronil Roach Bait Gel may be placed into refillable bait stations designed for interior or exterior use; when placing bait in stations do not exceed 1 gm (1/5 teaspoon) and do not exceed the capacity of the stations. Close the station securely after application. During follow up visits inspect placements and reapply as needed.

Directions for loading cartridges and operation:

1. With the teeth of the drive rod facing up, pull the drive rod all the way back. If the drive rod is initially hard to move, simply un-screw (turn counter-clockwise) the [black][or other color] portion of the applicator that holds the gel cartridge until the drive rod moves easily.
2. Attach a pre-filled cartridge of gel with a twist-locking motion. Remove the outlet cap and attach a dispensing tip. After use, the cartridge may be resealed with the enclosed [black][or other color] outlet cap. The [black][or other color] outlet cap is reusable.
3. Turn the knob of the drive rod so that the teeth are facing down and move it slightly forward so that the trigger mechanism will engage. Squeeze the trigger until the drive plunger sits against the piston in the gel cartridge. Gently squeeze the trigger until the gel flows out.
4. If gel continues to flow after the trigger is released, simply un-screw the portion of the bait applicator that holds the cartridge to a point where gel does not continue to flow after the trigger is released.

Directions for changing cartridges: With the arrow on the drive rod pointing up, pull the drive rod out as far as it will go. Remove the empty cartridge and follow instructions in the Storage and Disposal box. Cartridges that still contain gel can be sealed with the end cap and outlet cap for future use. To attach a new cartridge, follow the above directions.

-or

For syringe

To apply gel: Remove the cap on the nozzle, touch the tip to cracks and crevices or apply as a spot, and depress the plunger. The bait will adhere to non-greasy or non-dusty surfaces and will remain pliable and palatable to cockroaches as long as it is visibly present. Reapply when bait is no longer visibly present, according to the remaining level of infestation, which is generally at a lower rate (see Application Rate Table) than the initial treatment. A visual inspection of bait placement is recommended at one month after the initial treatment. Reapplication should occur if the bait is visibly depleted.

Pest population reduction will be visible within 1 day for German roaches and 3-4 days for American roaches.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area out of reach of children.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site

or at an approved waste disposal facility.

CONTAINER HANDLING: If Empty: Do not reuse container. Place in trash Or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[LIMITATION OF WARRANTY AND LIABILITY]

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

[The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Nouvel Sales, LLC or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Nouvel Sales, LLC and Seller harmless for any claims relating to such factors.

Nouvel Sales, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Nouvel Sales, LLC, and to the extent consistent with applicable law, Buyer and User assume the risk of any such use. **NOUVEL SALES, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

IT IS NOUVEL SALES, LLC, AND SELLERS INTENTION THAT to the extent consistent with applicable law, in no event shall Nouvel Sales, LLC or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. To the extent consistent with applicable law, **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF NOUVEL SALES, LLC, AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF NOUVEL SALES, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Nouvel Sales, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Nouvel Sales, LLC]

{END of SUB-LABEL A: COMMERCIAL USE}

{MASTER LABEL – Unless otherwise noted, all text shown prior to the start of sub-label A will be present on sub-label A, sub-label B, and sub-label C when final printed labeling is prepared.}

{SUB-LABEL B: CONSUMER USE}

DIRECTIONS FOR USE

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

This ready-to-use gel bait formulation is effective at controlling German, American and Oriental cockroaches in homes and residential structures.

Product may stain textiles, fabrics, and or porous surfaces.

USE RESTRICTIONS:

- USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS.
- Do not treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- Do not apply bait gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.
- Do not apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation, and prepared food holding surfaces as bait may be removed by washing.
- Do not apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- Do not deposit gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface. Clean [*or remove*] gel bait deposits with a damp paper towel or rag, or if dried, use a putty knife to scrape and discard in trash.
- Do not apply in areas exposed to direct sunlight.

APPLICATION DIRECTIONS:

The application rate (amount of Nouvel Sales Fipronil Roach Bait Gel per square yard) will vary according to the level of infestation and the type of cockroach to be controlled. Nouvel Sales Fipronil Roach Bait Gel is to be dispensed either as a spot or a thin bead. A spot is created by holding the syringe tip stationary and depressing the plunger until a small round deposit (¼ inch diameter) is dispensed. A thin bead is created by depressing the plunger of the syringe and moving the tip of the syringe at a rate that creates a contiguous line that is approximately the diameter of the syringe dispensing tip. Apply Nouvel Sales Fipronil Roach Bait Gel as a spot treatment dispensing either round spots or thin beads. Place bait close to cockroach harborages, foraging, and feeding areas such as corners and cracks and crevices. Numerous smaller bait placements provide faster control than fewer larger placements. In cases of severe infestation and areas with excessive clutter or alternative food sources that cannot be eliminated, use the highest rate of application.

WHERE TO USE:

Indoors in kitchens, bathrooms, basements, garages and laundry rooms as a crack and crevice, spot treatment or bait station application. Apply to areas frequented by cockroaches such as openings leading to voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, and behind and under appliances and cabinets where cockroaches are typically known to hide.

Outdoors as a spot, thin bead or bait station application at pest entry sites such as along windows and

doors, sewer areas, adjacent trees that harbor cockroaches, utility entry points, along walls, garbage holding areas, and other locations that serve as harborage for cockroaches. Select bait gel placement locations to reduce the potential for subsequent human contact.

HOW TO APPLY [DIRECTLY FROM SYRINGE]:

Cockroaches prefer pressure on three sides of their body and spend 75% of their existence living in cracks and crevices. For this reason, syringe applications directly in cracks and crevices will go a long way in eradicating the cockroach population.

For light to moderate infestations, apply 1 to 3 spots of this gel bait per 10 linear feet or one square yard. For heavy infestations, use 3 to 5 spots of gel bait per 10 linear feet or one square yard. Each bait spot should equal about 0.5 grams (1/4" diameter spot).



Figure 1: Spot of gel bait approx. 0.1 gram

For all levels of cockroach infestation, you can also apply this gel bait in lines approximately 1/8-inch wide by 2 inches long. Inspect placements of gel bait periodically and apply fresh bait as needed.

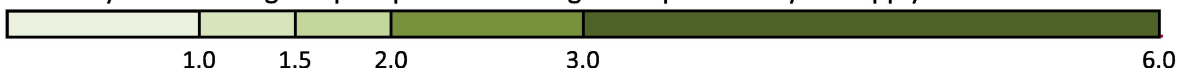


Figure 2: Line of gel bait approximately 1/8 inch wide illustrating 5 lengths; 1.0, 1.5, 2.0, 3.0 or 6.0 inches in length

[NOUVEL SALES Fipronil Roach Bait Gel deposit targets (table below)]

Bait Quantity Deposit Reference Table	
Amount of bait deposit	Approximate weight of application
¼ inch spot	0.10 grams
1.0-inch bead	0.22 grams
1.5-inch bead	0.33 grams
3.0-inch bead	0.67 grams
6.0-inch bead	1.33 grams

NOUVEL SALES Fipronil Roach Bait Gel Application Rates

BAIT QUANTITY REFERENCE TABLE				
Cockroach Type	Cockroach Infestation	No. ¼" bait spots per 10 feet or 1 square yard	Number of beads [or lines]	Length of bead [or line]
Small ¹	Light	7	3-4	1.0"
Small	Light-Moderate	15	6-7	1.0"
Small	Heavy	30	9	1.5"
Large ²	Average	10-20	5-10	1.0"

¹small type cockroaches include the German and brownbanded cockroaches

²large cockroaches include American, smokey brown and oriental cockroaches

For bait spots or beads [or lines]:

- Remove cap from syringe tip.
- Place syringe tip at the surface to be treated.
- Apply light pressure to the plunger of the syringe.
- After dispensing gel bait, replace cap on syringe tip.

Apply the NOUVEL SALES Fipronil Roach Bait Gel either as ¼ inch spots or 1/8" wide beads of varying length. The amount to apply per 10 feet or one square yard varies on the species and density of the infesting cockroach. As per NOUVEL SALES Fipronil Roach Bait Gel Application Rates table, apply more bait per unit area for moderate to heavy infestations than for light infestations. In general, also apply more for bait for large cockroaches than for small cockroaches. Applying multiple small beads of gel bait is more effective than a single long bead. For example, referring to row one of the table, typically it is more effective to disperse three to four 1" beads in cracks and crevices than to apply a single 3" or 4" long bead.

HOW TO APPLY [USING REFILLABLE BAIT STATIONS]:

For refillable bait stations:

To fill the bait stations with roach gel bait...

- Insert plunger into the open end of the syringe and then remove cap from syringe tip.
- Place tip of the syringe into the hole in the center of the bait station.
- Gently apply pressure to the plunger to fill the empty bait station with two grams of bait. The bait station is properly filled when the gel bait reaches the top of the pie-shaped fill level indicator.
- When bait filling is complete, firmly replace the cap on the tip of the syringe.

Indoors: Place 1 to 4 filled bait stations (hole side up) under sinks, behind appliances, inside cabinets, inside garbage containers, in corners of cupboards, closets, under furniture and other locations where roach activity has been observed.

Outdoors: Place 1 to 4 filled bait stations (hole side up) where roaches are actively foraging for food along exterior walls, near garbage cans and doorway entrances.

Roaches will forage for food and can consume the bait within a matter of a few hours. The bait station cap allows for easy inspection of roach activity. When the bait station is empty (or near empty), refill the empty bait station with two more grams of bait.

Important roach baiting reminder: Whether using the syringe to apply bait directly to the target area or to fill a bait station, keep a fresh supply of bait available for roaches. The clear view cap of the refillable bait station allows for easy inspection of roach activity. Cockroaches can remain active year-round and prefer locations near food and water, and will gravitate to warm indoor locations. For every one roach you see, hundreds more are harboring inside your walls. Cockroaches are primarily nocturnal feeders. Roaches seen during the day were most likely forced out due to overcrowding, a possible sign of a severe infestation.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area out of reach of children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility. **If Empty:** Do not reuse

container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[LIMITATION OF WARRANTY AND LIABILITY]

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

{Note to reviewer: Limitation of Warranty and Liability Option 1}

[The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Nouvel Sales, LLC or Seller. to the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Nouvel Sales, LLC and Seller harmless for any claims relating to such factors.

Nouvel Sales, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Nouvel Sales, LLC, and to the extent consistent with applicable law, Buyer and User assume the risk of any such use. **NOUVEL SALES, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

IT IS NOUVEL SALES, LLC, AND SELLERS INTENTION THAT to the extent consistent with applicable law, in no event shall Nouvel Sales, LLC or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. To the extent consistent with applicable law, **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF NOUVEL SALES, LLC, AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF NOUVEL SALES, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Nouvel Sales, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sales and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Nouvel Sales LLC]

{Note to reviewer: Limitation of Warranty and Liability Option 2}

[NOTICE: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

WARRANTY: Guaranteed to work when used as directed or your money back.]

{END of SUB-LABEL B: CONSUMER USE}

SYRINGE LABEL FOR NOUVEL SALES Fipronil Roach Bait Gel
{Applicable for both commercial and consumer products}

NOUVEL SALES Fipronil Roach Bait Gel	
NOTE: Do not remove this label. Use only in areas not easily accessible to children and pets.	
ACTIVE INGREDIENTS:	
Fipronil	0.05%
OTHER INGREDIENTS:	<u>99.95%</u>
TOTAL:	100.00%
KEEP OUT OF REACH OF CHILDREN	
CAUTION: Keep gel away from foods and food contact surfaces. Causes moderate eye irritation. Avoid contact with eyes and clothing. Wash thoroughly with soap and water after handling.	
CONTAINER HANDLING: If empty: Do not reuse container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.	
EPA Reg. No. 92028-4	EPA Est. No. _____
NET WT. ____ ounces (____ grams)	May stain textiles, fabrics and/or porous surfaces.
SEE [OUTER CARTON][PACKAGE LABEL] FOR COMPLETE DIRECTIONS AND PRECAUTIONS	

{MASTER LABEL – Unless otherwise noted, all text shown prior to the start of sub-label A will be present on all sub-label A, sub-label B and sub-label C when final printed labeling is prepared.}

{Sublabel C: RTU Pre-Filled Non-Refillable Bait Station (entire sublabel is an amendment to the Master Label)}

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Read entire label. Use strictly in accordance with label precautionary statements and directions.

Nouvel Sales Fipronil Roach Bait Gel is a ready-to-use insecticide product in a pre-filled, non-refillable bait station used to control German, American and Oriental cockroaches.

HOW TO APPLY [Pre-Filled] [Non-Refillable] [Bait Stations]:

Single Use Bait Stations: Cockroaches will forage for food and will consume more bait at the onset of bait station placement than they will in the following days. The bait within the bait station should be inspected weekly to ensure there is still plenty of bait available for the cockroaches to feed on. Once the bait is consumed, throw away the old bait station and replace with a new one. Place bait stations in close proximity to areas where cockroach activity is seen.

Two-step activation of bait station: There are two steps required to deploy the bait station, 1) open the station and 2) activate the bait.

- 1) To open, secure bait station firmly in one hand and with the other hand, squeezing along the perforated line, tear off the tip to open the tunnels to the bait. Discard the plastic tip.
- 2) Then, to activate the bait, locate the dome shaped bait chamber {or} [compartment], which is opposite the opening. Using the thumb and forefinger fully squeeze the top and bottom portions of the bait [chamber][compartment] to break the seal and force the bait into the feeding chamber portion of the bait station. *{Insert optional diagram/icons}*

Placement of Bait Stations

Place the bait stations in the locations where the cockroaches are most frequently seen along baseboards and near cracks and crevices.

Indoors: Place 1 to 4 bait stations to treat areas (1.5-3.0 sq yds) under sinks, behind appliances, inside cabinets, inside garbage containers, in corners of cupboards, closets, under furniture and other locations where roach activity has been observed; adjacent to walls and flush in corners.

Outdoors: Place 1 to 4 bait stations to treat areas (1.5-3.0 sq yds) where roaches are actively foraging for food along exterior walls, near garbage cans and doorway entrances; adjacent to structure.

{Note to reviewer: the table and paragraph below are to clarify number of stations in a larger area {>3 sq yd} for treatment, and either or both will be printed on the market label}

Number of Bait Stations per 100 square feet to treat each species		
Cockroach species	Bait Stations Light Infestation	Bait Stations Heavy Infestation
German (<i>Blattella germanica</i>)	7	13
Oriental (<i>Blatta orientalis</i>)	4	9
American (<i>Periplaneta Americana</i>)	4	9

For effective control of German cockroaches use 7 to 13 bait stations per 100 sq ft of horizontal surface area. For effective control of American and Oriental cockroaches use 4 to 9 bait stations per 100 sq ft of horizontal surface area.

Roaches will forage for food and can consume the bait within a matter of a few hours. The bait station cap allows for easy inspection of roach activity. When the bait station is empty (or near empty), replace the empty bait station if roaches return and/or bait has been fully consumed.

Use Restrictions:

- USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS.
- Do not treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- Do not apply to areas which have been recently sprayed with insecticide, and do not spray insecticide over stations as it may cause the bait to become repellent.
- Do not apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- If gel contacts an exposed surface, remove gel and wash exposed surface. Clean [or remove] gel bait deposits with a damp paper towel or rag, or if dried, use a putty knife to scrape and discard in trash.
- Do not apply in areas exposed to direct sunlight.

FOOD/FEED HANDLING ESTABLISHMENTS: Placement of the bait stations within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment by placing bait stations in cracks and crevices: under or behind baseboards, moldings, appliances and equipment. If bait gel contacts an exposed surface where food is handled, remove bait station, wash exposed surface and rinse prior to use.

Food/feed areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas are also considered a food/feed area when food is exposed and facility is in operation. During follow-up visits inspect bait stations and replace if roaches return and or bait has been fully consumed.

Use Restrictions in Food/Feed Handling Establishments:

- Do not place bait stations in areas where food/feed, utensils, or processing surfaces may become contaminated.
- Do not allow bait gel to contact exposed surfaces. If a spill occurs, remove bait station, wash exposed surface and rinse prior to use.
- Do not contaminate food and feedstuffs.

- Do not spray the bait stations with insecticides or place them on surfaces freshly sprayed with insecticides; doing so may repel cockroaches from entering the bait station

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area out of reach of children.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: **If Empty:** Do not reuse container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[LIMITATION OF WARRANTY AND LIABILITY]

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

{Note to reviewer: Limitation of Warranty and Liability Option 1}

[The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Nouvel Sales, LLC or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Nouvel Sales, LLC and Seller harmless for any claims relating to such factors.

Nouvel Sales, LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Nouvel Sales, LLC, and to the extent consistent with applicable law, Buyer and User assume the risk of any such use. **NOUVEL SALES, LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

IT IS NOUVEL SALES, LLC, AND SELLERS INTENTION THAT to the extent consistent with applicable law, in no event shall Nouvel Sales, LLC or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. To the extent consistent with applicable law, **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF NOUVEL SALES, LLC, AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF NOUVEL SALES, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Nouvel Sales, LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sales and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Nouvel Sales LLC]

{Note to reviewer: Limitation of Warranty and Liability Option 2}

[NOTICE: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

WARRANTY: Guaranteed to work when used as directed or your money back.]

Manufactured by:

Mylva S.A.

Via Augusta, 48

08006 Barcelona, Spain

Bait Station Immediate Container Label

{Note to reviewer. Due to small container size, at a minimum, the following information will appear on the immediate container- product name, % active ingredient, EPA Reg. No., KOOROC, Stop-read the label before use, net weight, and company name.}

[Optional Marketing Claims that may or may not appear anywhere on market label:]

[Efficacy related]

- Kills Roaches and Keeps on Killing
- Long lasting control
- Dual -or- Double killing action -or- formula*
- Kills two ways*
- *ingestion or contact
- Kills [cockroaches in 2 ways] by ingestion and contact
- Kills roaches through -or- by ingestion -or- contact
- Guaranteed to kill roaches
- Guaranteed to work (or your money back)
- Guaranteed to work* (*or your money back)
- Works every time* (*or your money back)
- Works the first time* (*or your money back)
- Satisfaction Guaranteed
- Controls German roaches
- Effectively kills without a trace - - no fumes or odor
- Kills and -or- controls American roaches and Palmetto Bugs
- Starts killing large roaches in 1-2 days
- Kills roaches where you can't find them
- Kills roaches you don't see
- Kills roaches you see and [even] those you don't [for complete protection]
- Kills -or- destroys the egg machine
- Use outdoors to prevent large roaches from coming indoors
- Fast acting ingredient
- Fast acting -or- action ingredient -or- formula
- Kills roaches quickly
- Quick kill formula
- Fast action formula
- Kills quickly and keeps on killing
- Roach control in 2 days (German)
- Roach control in 8 days (American)
- See visible results overnight
- Starts killing within a day
- Starts killing roaches in hours -or- overnight
- Starts killing [roaches] overnight and keeps on killing
- [Effective/works/keeps working] until bait is completely [consumed/depleted/eaten]
- Use bait [year-round/all year] for continuous German and Brown Banded cockroach control in monthly or quarterly applications made for use in maintenance programs
- Starts working in hours
- Provides FAST CONTROL in 2 days (German roaches)
- **Dual Action kills roaches two ways.** Contains Fipronil, which kills roaches by ingestion and contact. During-or- After foraging roaches either eat or contact the bait, they return to the harborage and contaminate -or- kill other roaches.
- **Kills roaches in their harborage.** Inject bait into cracks and crevices or apply as a spot where roaches harbor or enter a structure.
- **This product effectively controls large roaches.** This product contains Fipronil, a fast-acting

active ingredient that kills American roaches. This product controls large [American] roach populations in 8 days.

- How it works: This gel bait is attractive to German, American and Oriental cockroaches. The handy applicator makes it easy to apply small placements of gel bait. For high cockroach densities, more placements will allow more roaches to eat bait at the same time.
- [Attracts &] kills German, American and Oriental cockroaches
- [Attracts and] kills common household roaches (German, American and Oriental)
- Control of large & small [roaches / roach species]
- Kills roaches [at their source] [where they hide] [where they breed]
- One product for [large & small] common household roaches
- [Easy to use] for light or heavy roach [problems / infestations / populations / invasions]
- Control from a few invading roaches to heavy infestations
- Can be used in households with children & pets when placed out of reach
- Can be used in households with children & pets when used as directed and placed in an area inaccessible to children and pets
- Use for light or heavy infestations
- Kills cockroaches in cracks, crevices, in and around buildings and wall voids
- Kills cockroaches, including the large Oriental, American and Smokey Brown roaches, and the smaller German roach
- Kills cockroaches where they hide, breed and live
- Controls hidden cockroaches
- Kills cockroaches in and around buildings and wall voids

[Formulation related]

- No vapor or fumes
- Odorless
- Does not contain peanut butter

[Use Related]

- For crack and crevice cockroach control
- Use in cracks and crevices
- Use in cracks and crevices against roaches
- Easy to use [apply] [; nothing to activate]
- No messy residue
- No mixing required
- [Designed] [Ideal] for use in kitchens
- For indoor and outdoor (adjacent to home -or- structure) use [cockroach control]
- Work's inside and outside (adjacent to home -or- structure)
- Convenient [syringe] applicator
- Precision syringe applicator
- Ready-to-use
- For hard to reach places [such as cracks and crevices]
- Easy way to apply bait
- Gets bait where roaches live
- Where to use: In and around homes and other [buildings] [structures] where roaches have infested or where they travel to seek food, water or shelter.
- When to use: When cockroaches are observed or there is evidence of an infestation in

or around homes and building.

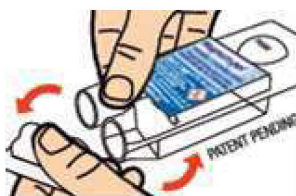
- No mess roach control
- [Perfect for] [For use in] (*include any or all of the following*) kitchens, bathrooms, garages, attics, basements, entries, foyers, living rooms, bedrooms, closets
- Use (*include any or all of the following*) in cabinets, under furniture & appliances, behind toilets, in trash areas, near doors and windows, under sinks
- Treats hard to reach places
- Bait gel is out of human sight in cracks and crevices, preserving a clean appearance
- Stays where applied
- Precise bait placement, without the mess and odor
- Use indoors and outdoors adjacent to home or structure
- Bait gel for Spot, Crack and Crevice

[Bait Station related]

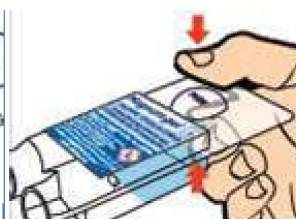
- [Contains] X bait stations
- No drips, spills or mess
- Pre-filled bait station(s)
- Ready to use
- [Indoor] & [Outdoor] Use
- Easy to apply
- No mess application
- Easy to clean-up

{Note to reviewer: Patent has been issued and number may be listed on market label.}

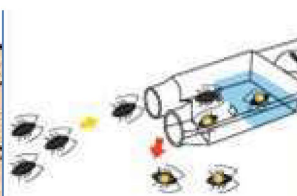
[Images and Text of Bait Station Deployment [Activation]]



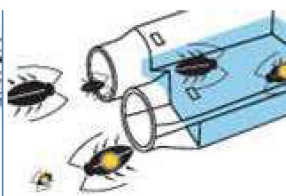
Opening bait station:
Secure bait station firmly in one hand and with the other hand, squeeze along the pre-etched[perforated] lines and break away the endcap[tear off plastic tip]



Activating bait: Use thumb and forefinger to fully squeeze the top and bottom portion of the dome shaped bait capsule [to break the seal and force the bait into the feeding chamber portion of the bait station]



Bait station placement:
Place the bait station in the area of a room where the cockroaches are most frequently seen [or suspected to be hiding]



Bait station design: Bait station is designed to be used for all types and sizes of cockroaches

[Package related]

- [Bonus / Value] Pack
- Bonus – [XX] free bait stations* (*vs. ## pack)
- Bonus – [XX%] more free* (*vs. ## pack)

{Note to reviewer: the following text options can be used with bait station package when adhesive is included}

- [Use enclosed adhesive tape (or adhesive strips)(or adhesive squares) to affix bait station in place.]
- [If desired, the enclosed adhesive (tape or strips or square) can be used to secure bait stations [in position][where you want them.]]
- [Press firmly to affix bait stations to cabinets, floors & walls with enclosed adhesive (tape or strips or squares)].
- [Not intended for use on wallpaper or painted surfaces.]
- [Test adhesive in an inconspicuous place before use.]

{Note to reviewer: the following optional statements are similar though vary in length and description due to the package size constraints. These optional statements will not appear in the Directions for Use. Only one option will be used per package size.}

[Use Nouvel Sales Fipronil Roach Bait Gel station(s) in Residential, Commercial, Industrial, Food/Feed Handling Establishments (non-food/feed areas), Restaurants, Hospitals and Nursing Homes (Non-patient Areas), Hotels, Motels, Agricultural Buildings, Office Buildings, Schools, Transportation Equipment (Buses, Cargo Trucks, Trailers, Trains), Animal Rearing Establishments, and Warehouses]

[Use Nouvel Sales Fipronil Roach Bait Gel station(s) to provide treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments.]

[Use Nouvel Sales Fipronil Roach Bait Gel station(s) to provide treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments. Non-food/non-feed areas include: bedrooms, living rooms, bathrooms, closets, media rooms, garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, basements, attics, crawl spaces, mop closets, and storage (after canning or bottling). This product may also be used in food/feed areas of food/feed handling establishments as specified in the Food/Feed Handling Establishments section.]

[Use Nouvel Sales Fipronil Roach Bait Gel station(s) to provide treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments, including: warehouses, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, apartment buildings, bakeries, beverage plants, breweries, bottling facilities, candy plants, canneries, cereal processing and manufacturing plants, dairies and dairy product processing plants, frozen food plants, schools, laboratories, computer facilities, aircraft, buses, boats/ships, trains, homes, industrial buildings, office buildings, animal boarding facilities, kitchens, manufacturing facilities, spice plants, stores, wineries and similar structures, mausoleums, meat processing and packaging plants, meat and vegetable canneries, pet shops, and zoos. Non-food/non-feed areas include: bedrooms, living rooms, bathrooms, closets, media rooms, garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, basements, attics, crawl spaces, mop closets, and storage (after canning or bottling). This product may also be used in food/feed areas of food/feed handling establishments as specified in the Food/Feed Handling Establishments section.]

[Use Nouvel Sales Fipronil Roach Bait Gel station(s) to provide treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in the non-food/non-feed areas of

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institutional, warehousing and commercial establishments, including: warehouses, restaurants (non-public areas), food processing plants (including meat or vegetable processing plants or canneries), supermarkets (non-public areas), hospitals (non-public areas), laboratories, computer facilities, animal housing facilities (such as dairies and dog boarding). Non-food/non-feed areas are areas such: as garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).]