

1001-73

7/13/2006

Page 129

JUL 13 2006

Ms. Karen A. Plumley, Ph.D.
 Director-Regulatory Affairs
 Cleary Chemical Corporation
 178 Ridge Road
 Dayton, New Jersey 08810

Subject: Product Name: Ecologix Cockroach Bait
 EPA Reg. No: EPA Reg. No. 1001-73
 Application for Notification Dated: June 14, 2006

Dear Dr. Plumley:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PRN 98-10 and it has been determined that the action(s) requested falls within the scope of PRN 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received, but not reviewed" and will be placed accordingly in our records.

While the Notification as submitted is acceptable, BPPD notes that the subject label must be updated to reflect the recommendations as provided in PR Notices beginning from 2000-1 to date, including notifications submitted from the year 2003 to date. These updates should be made to the product label before your next application for a label amendment. Please note that a stamped label for this product can not be provided until a completely revised and/or updated label is received by the Agency.

Questions concerning this action should be directed to Andrew Bryceland at 703-305-6928 or email at bryceland.andrew@epa.gov.

Sincerely,



Sheryl K. Reilly, Ph.D.
 Chief
 Biochemical Pesticides Branch
 Biopesticides and Pollution Prevention Division

CONCURRENCES

SYMBOL	7511P	7511P						
SURNAME	Kollace	Kollace						
DATE	7/12/06	7/12/06						

279

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1001-73	2. EPA Product Manager Andrew Bryceland	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Cleary Chemical Corporation/Ecoloaix Cockroach Bait	PM# BPPD	
5. Name and Address of Applicant (Include ZIP Code) Cleary Chemical Corporation 178 Ridge Road Dayton, NJ 08810 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

NOTIFICATION
Reviewed: C. Paul...
7/13/06
Reviewed BY: _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Add the following statements to the "optional claims" list:

- "Child resistant packaging" The current list of optional claims contains the statement "Now in child resistant packaging." Because the child resistant packaging has been in use for several years, we would like to drop the "Now in" portion of the claim.
- "Ongoing long-term roach control without insecticidal odors or fumes" The current list of optional claims contains two separate statements "Ongoing long term roach control" and "Works without insecticidal odors or fumes" We have merely combined these two approved claims into a single sentence.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Karen A. Plumley, Ph.D.	Title Director-Regulatory	Telephone No. (Include Area Code) 732 329.8399 ext 1031
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Director-Regulatory	
4. Typed Name Karen A. Plumley, Ph.D.	5. Date 6/14/06	



3 8 9
Cleary Chemical Corporation

800-524-1662

732-329-8399

Fax: 732-274-0894

178 Ridge Road

Dayton, New Jersey 08810

www.clearychemical.com

June 14, 2006

Mr. Andrew Bryceland
Document Processing Desk (NOTIF) (7504P)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Ecologix Cockroach Bait (1001-73)
Notification: Addition of optional statements to "optional claims" list

Dear Mr. Bryceland:

Cleary Chemical Corporation is submitting a label notification for *Ecologix Cockroach Bait* (1001-73) to add the following optional statements to the "optional claims" list:

1. "Child resistant packaging"
The current list of optional claims contains the statement "Now in child resistant packaging." Because the child resistant packaging has been in use for several years, we would like to drop the "Now in" portion of the claim.
2. "Ongoing long-term roach control without insecticidal odors or fumes"
The current list of optional claims contains two separate statements "Ongoing long term roach control" and "Works without insecticidal odors or fumes". We have merely combined these two approved claims into a single sentence.

Please find enclosed the following information in support of this submission:

- EPA Form 8570-1
- Three copies of the proposed product label (one copy has label changes highlighted)

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Please review this material at your earliest convenience. If you have any questions regarding this application, please do not hesitate to contact me directly at 800.524.1662 ext. 1031. Thank you for your prompt attention to this matter.

Sincerely,

Karen A. Plumley, Ph.D.
Director-Regulatory Affairs

Enc.

489

NOTIFICATION
Not Reviewed
Date Reviewed: _____
Reviewed By: *CPollard*

Ecologix™ Cockroach Bait

FOR USE IN COMMERCIAL, INDUSTRIAL, AND RESIDENTIAL AREAS

Active Ingredients	
Oxypurinal.....	1.0%
Xanthine.....	1.0%
Inert Ingredients.....	98.0%
Total.....	100.0%

CONTAINS: (6, 12, 24, 60, OR 72) Bait Stations

CAUTION

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS

See back panel for ~~First Aid and~~ additional precautionary statements.

Product Description

Ecologix Cockroach Bait is an effective cockroach population control agent for control of small cockroaches, such as German cockroaches, even those known to be resistant to other classes of insecticides.

Ecologix Cockroach Bait can be used in any indoor areas where cockroaches are a problem. These include areas such as residential, warehousing and commercial establishments, including food service, food manufacturing and food processing facilities, hospitals, nursing homes, health care facilities, schools, daycare centers, basements, laboratories, computer and electronic equipment facilities, pet shops, zoos, aircraft, buses, boats, and trains.

Since most cockroach infestations require a long term, population control strategy, Ecologix Cockroach Bait is designed to be the key element in this program. The active ingredients act as a Nutritional Metabolism Disrupter which blocks the production of uric acid reserves needed by cockroaches during reproduction and growth. This mode of action disrupts egg production, the Birth Control Effect™, while controlling populations of both adults and nymphs.

Ecologix Cockroach Bait has been specially formulated to attract cockroaches to feed continuously, even in the presence of other foods. (The bait station is also designed with a transparent top, which allows the bait consumption to be monitored.) (the foregoing bracketed statement is optional depending exact specifications of stations produced: if used, the brackets will not be printed)

Optional Claims which may be used on printed labeling:

- ✓ (New) Innovative active ingredient
- ✓ (New) Unique patented active ingredient
- ✓ Unique patented technology
- ✓ Nutritional Metabolism Disrupters (NMDs)
- ✓ Nutritional Metabolism Disrupters (NMDs) have unique mode of action
- ✓ The next generation of roach control
- ✓ New generation of roach control
- ✓ New innovative technology
- ✓ Innovative long acting formulation
- ✓ Roaches keep on feeding
- ✓ Non repellent active ingredient
- ✓ Specially formulated to act slowly, insuring long term bait acceptance
- ✓ Unique bait formulation matrix
- ✓ Blocks roaches ability to store vital nutrients
- ✓ Disrupts nutrient storage cycle
- ✓ Blocks nutrient storage, resulting in starvation and death of roaches
- ✓ Specially formulated to act slowly, insuring long term roach population control
- ✓ Reduction in roach population begins within 6 to 10 weeks
- ✓ See fewer roaches within 6 to 10 weeks
- ✓ Long-lasting action
- ✓ Long-lasting power/control for 12 to 20 weeks
- ✓ Guaranteed, when used as directed, to control roaches or your money back
- ✓ Active agent passes through droppings of feeding roaches
- ✓ Active ingredient passed through feeding roaches to other roaches
- ✓ Feed through effect, passes active ingredient on to other roaches
- ✓ Roaches feeding on droppings from roaches that have fed on bait ingest an effective dose of active agent.
- ✓ Blocks growth and reproductive cycle
- ✓ Blocks vital nutritional storage cycle
- ✓ Kills 2 ways – direct bait consumption and indirect feed-through effect
- ✓ Dual action formula – controls roaches with bait and feed-through effect
- ✓ Kills roaches in their harborage area
- ✓ Kills roaches where you can't find them
- ✓ Kills roaches where they hide/breed/live
- ✓ On-going, long term roach control
- ✓ Works day and night
- ✓ Works while you sleep
- ✓ Works around the clock
- ✓ Begin to see control within 6 to 10 weeks
- ✓ Continuous roach control for 12 to 20 weeks
- ✓ Reproduction stopped
- ✓ No more eggs produced. Blocking the population cycle

- ✓ NMDs have the "Birth Control Effect"™
- ✓ Birth Control Effect™ stops the production of new eggs
- ✓ Birth Control Effect™ stops the production of new young roaches
- ✓ Birth Control Effect™ disrupts the roach cycle
- ✓ Birth Control Effect™ block roach cycle
- ✓ Birth Control Effect™ blocks roach population growth
- ✓ Birth Control Effect™ eliminates formation of new eggs
- ✓ Birth Control Effect™ technology blocks egg production
- ✓ Birth Control Effect™ stops roaches from multiplying
- ✓ Birth Control Effect™ breaks the roach life cycle
- ✓ Breaks the roach life cycle
- ✓ Use as a preventative maintenance product
- ✓ Preventative maintenance against nymph stage roaches
- ✓ Stops roaches before they become a problem
- ✓ Stops roaches from becoming a problem
- ✓ Works without insecticidal odors or fumes
- ✓ Protects and defends your home against roaches
- ✓ Easy to use
- ✓ No odors
- ✓ No vapors, no fumes, no mess
- ✓ Easy to hide bait station
- ✓ No mess application
- ✓ For a clean, roach free home
- ✓ Use them everywhere in the house
- ✓ Great for kitchen
- ✓ Easy to use; nothing to activate
- ✓ Easy to use; no clean-up
- ✓ The clean and easy way to control roaches
- ✓ Now in Child Resistant Packaging
- ✓ Child resistant viewable bait stations
- ✓ Ecologix... delivering pest control ... not just pesticides
- ✓ Child resistant packaging
- ✓ Ongoing long-term roach control without insecticidal odors or fumes

DIRECTIONS FOR USE

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

1. For effective cockroach control, enough Ecologix Cockroach Bait stations must be placed in areas of cockroach feeding to insure complete exposure of the cockroach population to the bait. The more bait that is placed in the proper locations, the more access the roaches will have to the bait, resulting in more effective control.
2. For light to moderate infestations, use 6 bait stations per 100 square feet of treatment area. (on 6 station carton, text is "3 bait stations per 50 square feet of treatment area")
3. In heavily infested locations, bait stations may be combined with other control programs. Place 10 -12 bait stations per 100 square feet of treatment area. (on 6 station carton, text is "5-6 stations per 50 square feet of treatment area")
4. Place the Ecologix Cockroach Bait stations in areas where cockroaches have been seen and where they hide. Cockroaches infest dark, warm, damp locations close to food and water such as kitchens and bathrooms. Place terminals in concealed locations such as under refrigerators and appliances and inside cabinets and drawers near plumbing fixtures.
5. Bait stations can be placed on horizontal or vertical surfaces next to and touching walls and flush in corners.
6. Do not spray the bait stations with insecticides or household detergents and avoid placing the bait stations on surfaces freshly sprayed with these products.
7. Cockroaches will begin eating the Ecologix Cockroach Bait immediately and the effects of the nutritional metabolism disrupter will begin to take effect. Since this is a long-term agent, population reductions will not be evident for six to ten weeks.
8. Routinely inspect all bait stations and replace as needed for continuous control of cockroaches. In areas where cockroach feeding is not occurring on previously placed stations, move those stations to areas of active feeding or where other stations have had the bait heavily consumed.

FIRST AID

IF IN EYES: 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 eye. Call a poison control center or doctor for treatment advice.

For Emergency Information call 1-800-222-1212 or your local Poison Control Center. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PRECAUTIONARY STATEMENTS**HAZARD TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Washing hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco will reduce exposure.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in an area not accessible to children.

STATION DISPOSAL: IF EMPTY: Do not reuse this container. Place in trash or offer for recycling if available. **IF PARTLY FILLED:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

TOTAL NET WT: 0.5 oz. (14.18 g.), QR 1 oz. (28.35 g.) QR 2 oz. (56.70 g.) QR 5 OZ. (141.75 g) QR 6 oz. (170.10 g) QR 10 oz. (283.50 g) QR 12 oz. (340.20 g)

EPA Reg. No. 1001-73

EPA Est. No. 33967-NJ-001

U.S. Patent Nos. 5,514,681; 5,620,982; 5,770,601; 5,582,025; 5,916,895

Cleary Chemical Corporation, 178 Ridge Road, Dayton, NJ 08810

979

Individual Station Label

Ecologix™ Cockroach Bait

THIS SIDE DOWN: Place this side down or against surface.
SEE OUTER PACKAGE FOR COMPLETE DIRECTIONS

Active Ingredients:

Oxypurinol.....	1.0%
Xanthine.....	1.0%
Inert Ingredients.....	<u>98.0%</u>
Total.....	100.0%

NET WT. 0.083 oz. (2.35 g) OR 0.166 oz. (4.71 g)

EPA Reg. No. 1001-73

EPA Est. No. 33967-NJ-001

CAUTION: DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAITS

CONTAINER DISPOSAL: See outer package for disposal instructions.

Cleary Chemical Corporation, 178 Ridge Road, Dayton, NJ 08810