

MAY 15 1997

Sally K. Swart
Ecolab Inc.
840 Sibley Memorial Highway
Mendota, MN 55118

Subject: Amended Product Labeling and Confidential
Statement of Formula
ECO2000-RX
EPA Registration Number: 1677-166
Application Dated: January 9, 1997

Dear Ms. Swart:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below:

- 1. Revise the Precautionary Statements to read as follows:

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION

Harmful if swallowed. Causes eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

- 2. Revise the Statement of Practical Treatment to read as follows:

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

- 3. Delete the sentence "General Classification: "from the Directions for Use.

4. Add the statement "Do not apply when facility is in operation or foods are exposed" to the Directions for Use in serving areas.

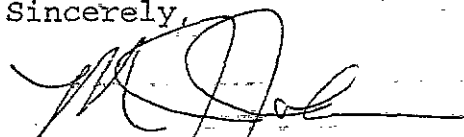
5. Revise the Pesticide Storage statement to read "Keep container closed when not in use. Store in an area inaccessible to children and pets."

6. Your Confidential Statement of Formula dated May 7, 1997, for the Basic Formulation is acceptable and supersedes all previously submitted CFSS for the Basic Formulation. This information has been placed in the file for the subject product.

7. Submit two copies of your final printed labeling before you release the product for shipment.

If you have any questions regarding this matter, please contact Melody Banks of my staff on (703) 305-5413.

Sincerely,



Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division (7505c)

PROPOSED COMPLETE LABEL

ECO2000-RX

FOR CONTROL OF: Cockroaches and Ants (other than Fire Ants)

FOR USE IN: Restaurants and other Food and Feed Handling and Processing Establishments, Hotels, Motels, Hospitals, Nursing Homes, Markets, Grocery Stores, Schools, Offices, Ships, Boats, Yachts, Buses, Trains, Planes, Warehouses, Factories, Zoos, Kennels, New Construction, Utilities, Homes, Apartment Buildings, Garages, Mobile Homes, Sewers.

ACTIVE INGREDIENT: BORIC ACID.....50.0%
INERT INGREDIENTS.....50.0%
TOTAL.....100.0%

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY 15 1997

NET WEIGHT: 4 ounces (113.4 grams)

CAUTION

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1677-166

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS: Hazardous to humans and domestic animals.

CAUTION: Harmful if swallowed. May cause eye irritation. Avoid eye contact.

STATEMENT OF PRACTICAL TREATMENT: Immediately contact Physician or Poison Control Center if swallowed. If eye contact occurs, flush eyes with plenty of water. Get medical attention if irritation persists.

DIRECTIONS FOR USE: General Classification. It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Not for re-sale. For ease of application, allow product to warm to room temperature. Remove a corner of the package. Holding the package in one hand, squeeze out pea-sized or smaller portions of bait and deposit behind and under stoves, ovens, refrigerators and freezers, dishwashers, sinks and openings around drains and plumbing, pantries, cabinets, cupboards and closets, washing machines and driers, bedroom dressers and chests of drawers. Reapply as necessary. Remove any deposits of bait from exposed surfaces. Avoid contamination of feed and foodstuffs.

FOOD AND FEED HANDLING ESTABLISHMENTS: Establishments such as restaurants; dairies; packaging, bottling and canning plants; bakeries; mills or anywhere food and feed is stored, prepared, processed and packaged.

FOOD AREA - LIMITED TO CRACK AND CREVICE TREATMENTS ONLY: Includes areas where food or feed is received, stored, prepared, served, packaged, handled in an enclosed system and where edible waste is stored. Remove a corner of the package. Holding the package in one hand, squeeze out pea-sized or smaller portions of bait directly into cracks and crevices, where equipment meets floors and walls; equipment and counter legs, bases, motors and conduits; holes and openings leading to wall voids where insects may hide. Avoid contamination of feed and foodstuffs and exposed surfaces where feed and food is prepared, processed and served.

NON-FOOD AREAS: Includes garbage rooms, rest rooms, laboratories, offices, locker rooms, boiler and equipment rooms, garages, mop closets and storage. Apply to baseboards, around water and drain pipes, underneath and behind sinks, lockers, tables and similar areas where insects may hide.

SERVING AREAS: Includes dining rooms, mess halls and other areas where prepared food is served. Apply pea-sized or smaller placements to selected surfaces such as baseboards, underneath booths and into cracks and crevices. Avoid contamination of exposed surfaces where food contact can occur.

STORAGE AND DISPOSAL: STORAGE: Keep container closed when not in use. PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. CONTAINER DISPOSAL: Wrap empty containers and place in trash.

Formerly Margaret K. Demetre's ROACH X-ODOS®, A Delicately Balanced Formula
U.S. Patent No. 4,988,511
EPA Registration No. 1677-166 EPA Establishment No. 62840-MN-001
MANUFACTURED FOR: ECOLAB INC., ECOLAB CENTER, ST. PAUL, MINNESOTA 55102