

1677-166

7/22/2003

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United States Environmental Protection Agency

Mr. Brian C. Brosdahl  
Ecolab, Inc.  
370 Wabasha St. Ecolab Center  
St. Paul, MN 55102

JUL 22 2003

Subject: Amendments of label updating First Aid Statements in accordance with PR Notice 2001-1  
EPA Reg No. 1677-166  
Product Name: Eco2000-XP  
Date of Submission: March 11, 2003

Dear Mr. Brosdahl,

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- 1. PR Notice 96-3 and use of this product in aircraft: The current label has the use site "Planes" listed on the label, therefore PR Notice 96-3 is applicable for either providing data to the Agency, or revising language as outlined below and in the relevant PR Notice.

To prevent unnecessary risks to aircraft passengers, the Agency will not register disinsecting products for use in occupied aircraft cabins unless data submitted and accepted by the Agency demonstrate that the use in occupied aircraft cabins does not pose unreasonable adverse effects to the environment. In addition, EPA will require that all labels of insecticide products registered for aircraft be carefully worded to make clear where the product may or may not be applied.

Registrants of disinsection products with labels that explicitly permit use in occupied cabins and who seek to continue that use must generate data and/or provide relevant information to demonstrate that the use in occupied cabins does not pose unreasonable adverse effects to human health. Such registrants will receive a data call-in within 90 days from issuance of this Notice. The Agency expects that such a data call-in will include requests for information on both the risks associated with use of insecticide products in occupied aircraft cabins and the benefits associated with such use. Alternatively, a registrant of a product which is registered for use in occupied aircraft cabins may choose one of the following options to eliminate that use of the product and avoid the requirement to submit data:

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGEBKEN							
DATE ▶	Jul 2, 2003							

. For products registered for use in aircraft other than in occupied cabins, include in the Directions for Use the statement: "Do not use in aircraft cabins." Remove all contradictory language.

. Delete all aircraft uses from the label.

Registrants of products which are registered for use in aircraft in areas other than occupied aircraft cabins should assure that their labeling is clear as to where the product may be used and should adopt the labeling statement in Option 1. above as well. Alternatively, a registrant may delete the aircraft use from the product altogether as in Option 2. above.

The Agency believes that the incremental costs of making the label changes specified above are outweighed by the benefits of ensuring the proper use of these particular registered pesticides.

**IV. WHAT TO DO TO COMPLY**

Registrants who are subject to this notice and who do not intend to retain a product's use in occupied aircraft cabins should take one of the following actions within 90 days of issuance of this Notice:

- . Amend the product labeling according to option 1 of Section III of this Notice by submitting an Application for Registration denoting "Notification" on the form (EPA Form 8570-1), a copy of the revised labeling and a certification statement. A photocopy of the EPA application form is acceptable; an original form is not needed. The following certification statement should appear on the application:

"Notification of label change per PR Notice 96-3."

"This notification is consistent with the provision of PR Notice 96-3 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 statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 96-3 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."

Changes in label text should be clearly marked so that they can be photocopied. The Agency will screen a Notification within 30 days of receipt and inform the registrant if the submission cannot be processed as a Notification. If the registrant chooses option 1 no other label changes may be made at the same time.

- 2. Amend the product labeling delete all aircraft uses (option 2) by submitting an application for amended registration and five copies of the proposed labeling, identifying the requested changes. The application for amendment must be accepted by the Agency prior to sale or distribution of the product with the amended label.

If no response is received within 90 days for any insecticide product on the attached list or which otherwise bears aircraft use, EPA will issue a data call-in to the registrant of that product or any other insecticide

spray product which can reasonably be interpreted to be used in occupied aircraft.

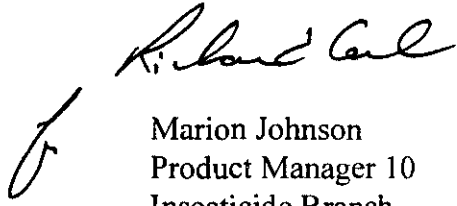
Final printed labeling must be submitted as part of the amendment or notification process, or separately in accordance with PR Notice 82-2, before the product with the revised label may be distributed in commerce.

Products covered by this Notice, but found not to be in compliance, may be subject to cancellation or enforcement action as appropriate.

A copy of PR Notice is available at the following Agency web address:  
[http://www.epa.gov/opppmsd1/PR\\_Notices/pr96-3.html](http://www.epa.gov/opppmsd1/PR_Notices/pr96-3.html)

If you have any questions, you may contact Richard Gebken at (703) 305-6701.

Sincerely,



Marion Johnson  
Product Manager 10  
Insecticide Branch  
Registration Division (7505C)

Enclosure  
001677-00166 S741273 wpd

# ECO2000-RX

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

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

<b>ACTIVE INGREDIENT:</b>	
Boric Acid .....	50.0%
<b>INERT INGREDIENTS:</b> .....	
	50.0%
<b>TOTAL:</b> .....	
	100.0%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
JUL 22 2003  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
1677-166

**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.

**FIRST AID**

**IF SWALLOWED:** Call a poison control center or doctor for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**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.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Not for resale. 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 (or remove both closures dispensing cartridge and place in an ECO2000 bait applicator. Apply...) 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 dryers, 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. ECO2000-RX is authorized by the USDA for use in federally inspected meat and poultry plants.

**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 (or remove both closures dispensing cartridge and place in an *ECO2000* bait applicator. Apply...) 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. Do not apply when facility is in operation or foods are exposed.

**STORAGE AND DISPOSAL**

**Pesticide Storage:** Keep container closed when not in use. Store in an area inaccessible by children and pets.

**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 container and place in trash.

Formerly Margaret K. Demetre's ROACH X-ODOS® , A Delicately Balanced Formula  
U.S. Patent No. 4,988,511

**Net Weight: 3 lb/1.4 kg**  
**(12 4 oz/113.4 g packages)**

EPA Reg. No. 1677-166  
EPA Est. No. 063416-MN-001, 1677-1MN (P)

Ecolab Inc., Pest Elimination Division  
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St. Paul, MN 55102-1390 U.S.A