

SEP 9 2003

Ecolab Inc.
370 Wabasha St. Ecolab Center
St Paul, MN 55102

Dear Mr. Brosdahl:

Subject: Label Revisions (PR Notices 2001-1 & 2001-6)
Product Name: ECO 2000-GR
EPA Registration No. 1677-191
Application date: January 14, 2003

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

- 1) Under the First Aid, make the following changes:
 - a) Under the **"If Swallowed"**, add **"immediately"** after **"doctor"**.
 - b) Add the following statement at the beginning or the end of the FIRST AID Statement:

"Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.

- 2) Revise the storage and disposal statements so that it provides instructions for both homeowner and commercial use:

The Storage and Disposal Statement for homeowner use must read as follows:

- a) **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 or **1-800-CLEANUP** which is managed as a public-private partnership.

- b) The storage and disposal statement for commercial use must read as follows:

Storage: Do not contaminate water, food, or feed by storage or disposal.
Store in a cool dry place. Do not store where children or animals may gain access.
Pesticide Disposal: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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Container Disposal: Completely empty bag into application equipment. Then disposal of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning, stay out of smoke.

3) Per our letter dated March 22, 1999, please add instructions to the user as to the quantity of product to be applied per given area.

A copy of your label is Accepted with Comments. Submit four (4) copies of the final printed labeling prior to releasing product for shipment.

To expedite handling, please return a copy of this letter with your final labels to Ms Pat Quarles. If you have any questions, please call (703 305-6876).

Sincerely



Linda Arrington
Acting Product Manager 10
Insecticide Branch
Registration Division 7505

ECO2000-GR

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, Factories, Zoos, Kennels, New Construction, Utilities, Homes, Apartment Buildings, Garages, Mobile Homes and Sewers.

**KEEP OUT OF REACH
OF CHILDREN**

CAUTION

ACTIVE INGREDIENT:

Boric Acid.....54.0%

INERT INGREDIENTS.....46.0%

TOTAL.....100.0%

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 ^{immediately} 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.

Have the product container on hand...

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. ~~Not for resale.~~ Apply this product 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.

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. Apply 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 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

Storage: Keep container closed when not in use. Store in an area inaccessible to 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: Do not reuse this container. Wrap empty container and place in trash.

EPA Reg. No. 1677-191
EPA Est. No. 063416-MN-001

Net Weight: 12 oz/340 g

Ecolab Inc., Pest Elimination Division
370 Wabasha Street N
St. Paul, MN 55102-1390

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

SEP - 9 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
1677-191

