

JUN 27 2007

IC Corporation
c/o Product and Regulatory Associates
P.O. Box 1683
Mr. John F. Wright
Voorhees, NJ 08043-9998

Subject: Revised Labeling
PIC Boric Acid Roach Killer Gel
EPA Registration Number: 3095-24
Application Dated: October 9, 2006
Decision No: 375202

Dear Mr. Wright:

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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- A. The Agency has completed reviewing the following Child-Resistant Packaging Data, (MRID's 470721-01, 470721-02, and 470721-03), and have concluded the following:
- Both the front can label and outer package front panel indicates the active ingredient is sodium teraborate pentahydrate. This is incorrect, and must be changed to sodium teraborate decahydrate.
 - The outer package front panel indicated 3 bait stations net weight 0.63 oz. are to be sold in a retail package. This is the equivalent of 18g not 8g and must be corrected.
 - In addition the life of the product based on weathered testing is 30 days as this label indicates. Any change to more than a 30 day product life would necessitate child resistant packaging retesting.

B. The Agency's Entomologists indicate that there is no data available in the regulatory files to support the following marketing claim:

- "Destroys the Entire Colony". You must submit and/or cite data to substantiate this claim, or remove the claim.

A stamped copy of the label is enclosed for your records.

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

Sincerely,



Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure: Stamped Copy of Label with Comments
Copy of Child Resistant Packaging
Data Evaluation Report

PIC ANT CONTROL SYSTEMS

Front Can Label

PIC ANT CONTROL SYSTEMS

PIC Logo

Marketing Claims

- Kill Ants

Pictogram

- Ants

ACCEPTED
with COMMENTS
to EPA Letter Dated

JUN 27 2007

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

3095-24

KEEP OUT OF REACH OF CHILDREN AND DOMESTIC ANIMALS

CAUTION

See first aid, storage, disposal and precautionary statements on outer packaging.

Active Ingredients Sodium Tetraborate Pentahydrate.....	5%
Ortho Boric Acid	4%
Other Ingredients	91%
Total	100%

NET WEIGHT: 0.21 oz / 6 grams

Side Can Label

Punch in semi-perforated holes

EPA Reg. No. 3095-24

EPA Est. No. 3095-NJ-1

Bottom Can Label

PIC Ant Control Systems

PIC Logo

DIRECTIONS FOR USE:

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

Remove all sources of food such as crumbs, sugar and grease spots.

Press in all side holes.

Place under sinks- refrigerators-cupboards.

Place by ant trails where ants are numerous.

For Garden & Lawn: Place along trails & ant colonies.

Put traps 10-20 ft. apart. In 3-7 days ants will be killed.
Replace with new traps every 30 days.
Avoid Contamination feed and foodstuff.

PIC CORPORATION
1101-1107 W. Elizabeth Ave., Linden, NJ 07036, USA
www.pic-corp.com

PIC ANT CONTROL SYSTEMS
Outer Packaging

Outer Packaging Front Panel

PIC ANT CONTROL SYSTEMS

PIC Logo

PIC Dependable Insect And Rodent Control Products For Over 50 Years

Marketing Claims

- Kill Ants
- Kills Sweet & Grease Eating Ants, Pavement Ants, Odorous Ants And Little Black Ants
- Effective And Easy To Use
- Destroys The Entire Colony

Pictogram

- Ants

KEEP OUT OF REACH OF CHILDREN AND DOMESTIC ANIMALS
CAUTION

See directions for use, first aid, storage, disposal and precautionary statements on back panel.

Active Ingredients Sodium Tetraborate Pentahydrate.....	5%
Ortho Boric Acid	4%
Other Ingredients	91%
Total	100%

NET WEIGHT: 0.63 ounces /18 grams
MADE IN U.S.A.

Outer Packaging Back Panel

PIC ANT CONTROL SYSTEMS

PIC Logo

Pictogram

- Ants

PIC ANT CONTROL SYSTEMS has been the effective method for destroying ants for years.

PRECAUTIONARY STATEMENTS:

Hazardous to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with eyes. Wash thoroughly with soap and water after handling. Avoid contamination of food or feed. Do not leave package where children or animals may gain access.

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 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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water 15-20 minutes. Call a Poison Control Center or Doctor for treatment advice.

HOT LINE NUMBER Have the product container or label with you when calling a Poison Control Center or Doctor, or going for treatment. For Emergency Information on our product call 1-800-255-3924.

DIRECTIONS FOR USE:

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

1. Press in all side holes.
2. Remove all sources of food such as crumbs, sugar and grease spots.
3. Place under sinks-refrigerators-cupboards.
4. Place by ant trails where ants are numerous.
5. For Garden & Lawn: Place along trails & ant colonies. Put Traps 10-20 ft. apart. In 3-7 days ants will be killed. Replace with new traps every 30 days. Avoid Contamination with food and feedstuff.

STORAGE AND DISPOSAL STATEMENT: Do not contaminate water, food or feed with storage and disposal.

STORAGE: Store in a cool dry place inaccessible to children and pets.

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.

HOW THE SYSTEM WORKS: The ants you see are worker food providers to the Queen Mother and the larvae residing in the nest. The worker ants feed the colony and then themselves. Thus, the entire colony is destroyed.

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MADE IN U.S.A.

EPA Reg. No. 3095-24

EPA Est. No. 3095-NJ-1

UPC Bar Code

Stock # AT-3