

OCT 17 2002

Mr. Rudolph E.A. Jackson
PIC Corporation
P.O. Cox 543
24 South Essex Avenue
Orange, NJ 07050

Subject: Label Amendment
PIC Liquid An Bait Kill
EPA File Number: 3095-47

Dear Mr. Jackson:

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

1, In accordance with PR Notice 2001-6, Revise your Storage and Disposal Statement to Read:

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 [toll free number meet the criteria in paragraph II.E.] for disposal. instructions. Never place unused product down any indoor or outdoor drain.

2. Revise your product label per the Efficacy/Entomologists comments and recommendations:

-The studies fulfill the product performance requirements for the proposed label claims.

-Add (excluding fire ants and carpenter ants) on the front panel in the bullet naming the pest ant species.

-Change "Odorous ants: to read "Odorous House ants".

-Remove the claim "long term control".

-In directions for use section on page 2, change the italicized sentence to read: "In approximately 7-10 days the bait will start killing ants. Baiting may be required for up to 2 months to kill all ants in a colony." This is the type of claim supported by your data. You might want to clarify such claims by discussing that the active ingredient is slow-acting.

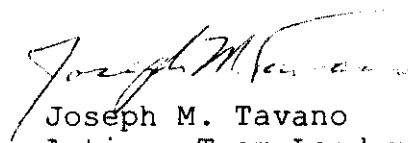
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-Queen/colony killing claims: Add: it may take up to two months to kill all queens in the baited colonies.

-A specific delivery device is mentioned in the studies - "The Ant Café". The label should state a specific device if required. However, the holes in the Ant Café are not for use with large ant species. It might be helpful to describe the type of device to be used with this product - on the label.

-In the future, the results of the statistical analyses should be more clearly presented and should include confidence intervals. The tables are helpful but can also be confusing without more explanation. The graphs were done well.

Sincerely,



Joseph M. Tavano
Acting, Team Leader (03)
Insecticide Branch
Registration Division (7505c)

FRONT PANEL

PIC LIQUID ANT BAIT KILLER

- **KILLS ANTS UP TO 2 MONTHS/ LONG TERM CONTROL**
- **KILLS SWEET & GREASE EATING ANTS, PAVEMENT ANTS, ODOROUS ANTS AND LITTLE BLACK ANTS**
- **EFFECTIVE FORMULA**
- **EASY TO USE IN CRACKS AND CREVICES**
- **EASY TO STORE**

ACTIVE INGREDIENT: SODIUM TETRABORATE PENTAHYDRATE..... 5%
 INERT INGREDIENTS:95%
 TOTAL:100%

MADE IN U.S.A.

DESTROYS ENTIRE ANT COLONY

REDUCES ANT POPULATION WITHIN DAYS

NET CONTENT: 2 oz (60 grams)

CAUTION: KEEP OUT OF REACH OF CHILDREN AND DOMESTIC ANIMALS.

See First Aid and Precautionary Statements on Back Panel.

ACCEPTED
 with COMMENTS
 In EPA Letter Dated:
 OCT 17 2002
 under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, the pesticide
 registered under EPA Reg. No.
3095-47

BACK PANEL

PIC LIQUID ANT BAIT KILLER is an effective method for destroying ants and their colonies.

It is easy to use and provides long-term control.

PRECAUTIONARY STATEMENTS: Hazardous to humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation.

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Avoid contact with skin, 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 person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the 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 to 20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continuing rinsing eye.

Call a Poison Control Center for treatment advice.

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

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

DIRECTIONS FOR USE:

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

1. Remove all sources of food such as crumbs, sugar and grease spots.
2. Remove the "bait reservoir" inserts from inside the box and carefully cut into squares"
3. Fold up the sides of each square to make reservoir. Fill reservoir and place where ants were seen, such as edge of sinks, tubs, baseboard, windowsills and doorway entrance. (If you do use the squares take aluminum foil and fold to make reservoir.

In approx. 7-10 days ants will be killed. Bait as often as needed. Avoid contamination of feed and foodstuff.

HOW THE SYSTEM WORKS: The ants you see are workers food providers to the Queen Mother and the larvae residing in the nest. The Worker ants feed the colony and the Queen. Thus, when the Worker ants bring back the bait, the entire colony is destroyed.

STORAGE AND DISPOSAL STATEMENT:

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

Pesticide Storage: Store in an area inaccessible to children and Pets.

Pesticide Disposal: Securely wrap used syringe in newspaper and discard in trash

SATISFACTION GUARANTEED: PIC Corporation guarantees the effectiveness of this product to control ants when the product is used according to directions. If dissatisfied with your purchase, please contact our customer service division at 1-973-678-7300. Please have product and original register receipt available.

EPA Reg. No. 3095-47

EPA Est. No. 3095-NJ-1

PIC Corporation
23 South Essex Avenue
Orange, NJ 07050

Dependable Insect and Rodent Control Products For over 40 years

Questions or Comments. Call 973-678-7300 or visit website: www.pic-corp.com

