SEP - 9 2003

BACON PRODUCTS COMPANY, INC. P.O. BOX 22187 CHATTANOOGA, TN 37422

Dear Mr. Edwards:

Subject: Amendment (PR Notice 2001-1 & 2001-6)

Product Name: Roach Destroyer

EPA Registration Number: 3487-20203

Application date: April 24, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act. as amended revising the label in compliance with PR Notice 2001-1 and 2001-6 is acceptable, and a stamped copy is enclosed for your records.

1) You must add a "PRECAUTIONARY STATEMENT" on your label and it should be categorized under the general heading "HAZARD TO HUMANS AND DOMESTIC ANIMALS". This paragraph must depict the particular hazards, routes of exposure and precautions to be taken to avoid injury or damage. It must read as follows:

Precautionary Statement

Hazards to Humans and Domestic Animals

Caution: Harmful if swallowed or absorbed through the skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

- 2) EPA encourages registrants to include a company telephone number or toll-free hotline number on their pesticide product labels in case of emergency. Refer to PRNotice 2001-6 for further guidance.
- 3) Revise the storage and disposal statement so that it provides instructions for both commercial and homeowner use:

Pg 2 EPA Reg. No. 3487-20203

a) 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.

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

b) The storage and disposal statement for homeowner use has been addressed and satisfies PR Notice 2001-6.

Sincerely,

Linda Arrington

Acting Product Manager 10

Insecticide Branch

Registration Division 7505

enclosure

Roach Destroyer

KILLS Roaches (PALMETTO BUGS, WATER BUGS) SILVER-**FISH AND ANTS**

LONG LASTING - ODORLESS - NON-STAINING POWDER

SATISFACTION GUARANTEED

homes

restaurants

schools

warehouses

offices.

motels

hospitals

garages

grocery stores

apartment buildings

theatres

boats

yachts kennels mobile homes

military bases

ACTIVE INGREDIENTS: ORTHOBORIC ACID.... 99.00%

OTHER INGREDIENTS:

1.00%

TOTAL

100.00%

EPA REG No. 3487-20203

EPA EST NO. 3487-TN-1

NET WT. 10 oz. (283g)

KEEP OUT OF REACH OF CHILDREN CAUTION SEE BACK PANEL FOR ADDITIONAL CAUTIONS

> ACCEPTED with COMMENTS In EPA Letter Dated:

> > SEP - 9 2003

Under the Federal Insecticide. Fungicide, and Redenticide Act, as amonded, for the positive registered under EPA Reg. No. 3487-20203

BACK PANEL

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. To control cockroaches, ants and silverfish, apply liberally, scattering under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer. Tubs: into openings around drains, water pipes and electrical conduits; and in cracks and crevices along baseboard and corners of cabinets, cupboards, and closets. Remove all lower drawers in kitchen and bathroom cabinets, bedroom dressers, chests of drawers, then scatter liberally drawer wells. Using handy squeeze bottle or by using a teaspoon. Reapply as necessary, any powder visible after application must be brushed into cracks and cravices or removed. Apply only in areas inaccessible to children and pets. Avoid contamination of feed and foodstuffs.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENT, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

SERVING AREAS - Facilities where prepared foods are served, such as dining rooms, but excluding areas where food may be prepared or held. Apply as a spot treatment to selective auritaces such as baseboard, under elements of construction into cracks and crevices. Avoid treating surfaces likely to be contacted by food. (Do not apply when facility is in operation or foods are exposed).

NON-FOOD AREAS - include garbage rooms, lavatories, floor drains (to sewer entries and vestibules), offices, locker rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

FOOD AND FEED HANDLING ESTABLISHMENT - Places other than private residences in which food or feed is held, processed, prepared or served.

FOOD AREA APPLICATION LIMITED TO CRACK AND CREVICE TREATMENT ONLY - include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation) also would be considered a food area. Apply in small amounts directly into cracks and crevices, in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases, conduits, motor housing and electric switch boxes where cockroaches hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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 polaon control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothing: Take off contaminated dothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If inhaled: Move person to fresh air, if person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 ienses, If present, after the first 5 minutes, then continue rinsing eye.

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 call 1.800.CLEANUP for disposal instructions. Never place unused product down any indoor on outdoor drains a Do not transfer to another container.

Menufactured by: Bacon Products Corporation P O Box 22187 Chattanooga TN 37422-2187