

AUG 23 2006

SafeGuard Chemical Corporation
411 Wales Avenue
Bronx NY 10454

Dear Ms. LaRocco:

Subject: Label Revisions

EPA Registration Number: 8848-20205

Product Name: BLACK JACK BORIC POWDER
ROACH KILLER

Application date: June 7, 2006

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) Move the Directions For Use section to page 4, the Storage and Disposal instructions must appear grouped together, preferably blocked, near the beginning or the end of the Directions for Use section (40 CFR 156.10(20)(x) (MLD-11). It is preferred that the storage and disposal instructions appear at the end of the use Directions section.
- 2) Revise the First Aid Statement to read "Have the product with you when calling a Poison Control or Doctor or going for treatment". In case of emergency, for additional information call (**insert toll free-emergency number**).

EPA encourages registrants to include a company telephone number or toll-free hotline number on their pesticide labels in case of emergency.

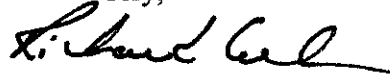
- 3) The company name and address must be on the pesticide label. The name and address must be that of the manufacturer, preceded by the phrase "Manufactured by ...". If you are not the manufacturer (producer), the name and address must be qualified by the phrase "Manufactured for..." to indicate that the name shown is not the producer. The name and address must be displayed prominently and within the range of type size that is required for all label text. The name and address may be placed anywhere on the label, but is referred on the front panel.

- 4) Delete "A spoon can be used to spread the powder" Kitchen utensils should not be encouraged for application of any pesticide product.
- 5) The language "apply liberally" and "Re-apply as necessary" will need to be revised to read "apply monthly."

Enclosed is a copy of your label stamped "Accepted with Comments".
Submit three (3) 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 printed labels. If there are any questions please contact Pat Quarles @ (703) 305-6876.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505

enclosure

3 8 6

ACCEPTED
with COMMENTS
in EPA Letter Dated:

AUG 23 2006

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

8848-2020

BLACK JACK BORIC ACID POWDER ROACH KILLER

ACTIVE INGREDIENT:

Boric Acid..... 100.00%

KILLS ROACHES, ANTS, SILVERFISH

EPA Reg. No. 8848-20205

EPA Est. No. 8848-NY-1

CAUTION

KEEP OUT OF REACH OF CHILDREN

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

NET WT. 16 OZ. (1 LB.) (453 GRAMS)

BLACK JACK BORIC ACID ROACH KILLER

BLACK JACK BORIC ACID is a white, non-staining, odorless, electro statically charged powder that clings to the legs of insects as they carry it back to their hiding places. This powerful product will destroy roaches and insects by ingestion. It also gives protection against ants, silverfish and water bugs.

DIRECTIONS FOR USE

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

SHAKE WELL. Remove cap to expose tip. Then snip off a portion of the tip as shown in picture No. 1, so that powder will flow freely. BLACK JACK BORIC ACID can be applied quicker by removing the cap as shown in picture No. 2, so that the powder will flow liberally. A spoon can also be used to spread the powder.



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 baseboards and corners of cabinets, cupboards, and closets. Remove all lower drawers in kitchen and bathroom cabinets, bedroom drawers and chests of drawers, and then scatter liberally in drawer walls.

This product may be used in homes, restaurants, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, industrial plants, theaters, ships, boats, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities and sewers.

Re-apply as necessary. Any powder visible after application must be brushed into cracks and crevices or removed. Apply only in areas inaccessible to children and pets. Do not use in edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed. Avoid contamination of feed and foodstuffs.

**BLACK JACK
BORIC ACID ROACH KILLER**

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

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

FIRST AID	
If Swallowed:	<ul style="list-style-type: none">• 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 a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If In Eyes:	<ul style="list-style-type: none">• 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:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If Inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

**BLACK JACK
BORIC ACID ROACH KILLER**

STORAGE AND DISPOSAL

STORAGE: Store in a dry place. Do not store where children or animals may gain access.

DISPOSAL: IF EMPTY - Place in trash or offer for recycling if available.

IF PARTLY FILLED: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

**SAFEGUARD CHEMICAL CORPORATION
BRONX, NEW YORK 10454
MADE IN USA**