

9608-2

8/21/2001

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AUG 21 2001

Ana Rodriguez-Koster, Lewis & Harrison  
122 C St., NW Suite 740  
Washington, DC 20001

Dear Ms. Rodriguez-Koster:

Subject: Amended Label (Response to Agency Letter dated 4/10/2001)  
Product Name: Roach Prufe  
EPA Registration No. 9608-2  
Resubmission date: May 23, 2001

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:

In accordance with PR Notice 2001-1, the heading "Statement of Practical Treatment" should be revised to read "FIRST AID" and must be placed in a box which sets that text apart from the rest of the label. The information must be presented in a narrative format and mark with a symbol such as a hyphen or other type "bullet" along the left margin and revised to read as follows:

**FIRST AID STATEMENT**

**IF SWALLOWED:** o Call a poison control center or doctor immediately for treatment advice.

o Have person sip a glass of water if able to swallow.

o Do not induce vomiting unless told to do so by a poison control center or doctor.

o Do not give anything by mouth to an unconscious person.

**IF INHALED:** o Move person to fresh air.

o If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

o Call a poison control center or doctor for further treatment advice.

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**IF IN EYES:** o 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.  
o Call a poison control center or doctor for treatment advice.

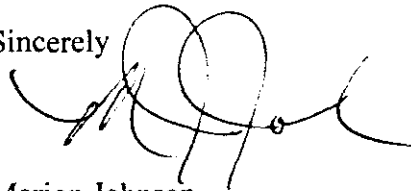
2) Add the following statements near the First Aid Statements:

“Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment”. In case of emergency, for additional information call (insert toll free-emergency number).

Enclosed is a copy of your label stamped “Accepted With Comments”. Submit four (4) copies of the final printed labeling before you release the product for shipment.

If you have any questions regarding this letter, please contact Ms. Pat Quarles, at (703) 305-6876.

Sincerely



Marion Johnson  
Product Manager 10  
Insecticide Branch  
Registration Division 7505

enclosure

**GRANTED 3 U.S. PATENTS**

United States Pat. No. 4,299,258, 4,438,090, 4,461,758

**FOR USE IN:**

Homes  
Apartments  
Hospitals  
Hotels  
Schools  
Factories  
Restaurants  
Markets  
Yachts  
Mobile Homes  
Buses  
Kennels  
Zoos  
Food Processing  
Plants  
New Building  
Construction  
Sewers

# roach prufe<sup>®</sup>

**ODORLESS NON-STAINING powder**



Active Ingredient:  
Ortho Boric Acid . . . . . 99.00%  
Other Ingredients: . . . . . 2.00%

EPA REG. NO. 9609-2  
EPA EST. NO. 9919-08-01

**NET WT. 1 lb.**

Note: Powder settles  
during shipping

**CAUTION: KEEP OUT OF REACH OF CHILDREN**  
(SEE DIRECTIONS AND CAUTIONS ON BACK PANEL)



**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
AUG 21 2001**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
9609-2

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

**To control roaches (water bugs, palmetto bugs), ants and silverfish:** Shake well before opening. Apply with teaspoon, 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 dressers and chests of drawers, then scatter liberally in drawer wells. Reapply 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. Avoid contamination of feed and foodstuffs.

**Directions for applying in new construction:** When treating large areas, such as wall voids, soffit and subcabinet voids in new and existing construction, dust liberally using dusting application equipment. A bulbous battery filler (available at auto supply stores) works well as the powder can be sucked up and blown into the voids.

**Crack and crevice treatment: 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.** Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems. **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 using a bulbous duster or other suitable equipment capable of applying insecticide 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 electrical switch boxes where roaches hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of feed or food processing surfaces.

**Application of this product in the food areas of food handling establishments, 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 surfaces such as baseboards, under elements of constructions 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, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling) Apply to baseboard areas, around water pipes, surfaces behind and beneath sinks, lockers, tables, pallets and similar areas where insects hide or through which they may enter.

**Precautionary Statement:**

**Hazards to humans and domestic animals.**

Harmful if swallowed or inhaled. Causes moderate eye irritation. Avoid contact with eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**Statement of practical treatment:** If swallowed: Call physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting. If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention. If in eyes: Flush with plenty of water. Call a physician if irritation persists.

**Storage and disposal:** Do not contaminate water, food or feed by storage or disposal. **Storage:** Store in a dry place. Do not store where children or animals may gain access. **Disposal:** Do not reuse empty container. Wrap container and put in trash collection.

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For University studies visit us on the Internet at <http://www.copperbrite.com> or studies can be mailed upon request.  
Made in U.S.A. • United States Pat. No. 4,299,258, 4,438,090, 4,461,758 • Aust. Pat. No. 522971 • Japan Pat. No. 1,412,411

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