

 EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other: Notification	OPP Identifier Number 265394
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Application for Pesticide - Section I

1. Company/Product Number 9608-2	2. EPA Product Manager Marion Johnson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Roach Prufe	PM# Team 10	
5. Name and Address of Applicant (Include ZIP Code) Copper Brite, Inc. 1482 East Valley Road Santa Barbara, CA 93108 <u>PLEASE DIRECT ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
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NOTIFICATION
DEC 17 2002

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

NOTIFICATION TO ADD PERSONAL PROTECTIVE EQUIPMENT LANGUAGE REQUIRED BY THE CALIFORNIA DEPARTMENT OF PESTICIDE REGULATION FOR ALL BORIC ACID-CONTAINING PRODUCTS

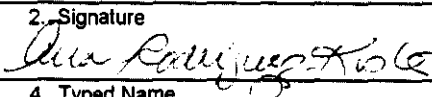
Notification to ADD PERSONAL PROTECTIVE EQUIPMENT LANGUAGE REQUIRED BY THE STATE OF CALIFORNIA in Accordance With PR Notice 98-10
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Ana Rodriguez-Koster Date: 12/6/02

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic: <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
*Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name: Ana Rodriguez-Koster, Lewis and Harrison, LLC 122 C St., NW Suite 740 Washington, DC 20001	Title: Agent for Copper Brite, Inc.	Telephone No. (include Area Code): (202) 393-3465 X: 17
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title: Agent for Copper Brite, Inc.	
4. Typed Name Ana Rodriguez-Koster, Lewis & Harrison LLC	5. Date <u>12/6/02</u>	

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

To control rodents (water traps, potholes traps), ants and silverfish: Shut off water opening. Apply with teaspoon. Thoroughly scuffing under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer, tub, 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 loose drawers in kitchen and bathroom cabinets, bathtubs, dressers and closets of drawers, then scuff thoroughly in drawer walls. Thoroughly clean and disinfect all areas inaccessible to children and pets.

Directions for applying to lawns: When watering large areas, such as well walks, paths and suburban roads in new and existing construction, dust liberally using existing application equipment. A battery battery filter (available at auto supply stores) works well as the powder can be sucked up and blown into the voids.

Crawl and service treatment: Feed and feed handling establishments - Places other than private residences in which food or feed is held, processed, prepared or served. Feed area applications should be made and applied to: feed storage areas for receiving, storage, packing (conveying, bottling, wrapping, bagging), preparing, other waste storage and incineration 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 hollow 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 rodents 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 to the feed areas of feed handling establishments, other than as a crawl and service 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 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 - Includes garbage rooms, landfills, floor drains (to sewer outlets and ventstacks), offices, locker rooms, machine rooms, boiler rooms, pump rooms, restrooms and storage (after covering or locking). Apply to baseboard joints, around water pipes, surfaces behind and beneath sinks, lockers, tables, points and other areas where insects hide or through which they may enter.

Precautionary Statement:

Harmful to humans and domestic animals. 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.

First Aid Instructions:

- 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.
- 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 flush slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue flushing eye.
- Call a poison control center or doctor for treatment advice.

Has the product container or label with you when calling a Poison Control Center or doctor or getting treatment. Location of emergency services: 1-800-857-2357.

Precautionary Equipment for New Construction - Wear normal work clothing (i.e., long sleeve shirt, long pants, shoes plus socks) and a NIOSH/MSHA approved dust mask respirator.

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.

GRANTED 3 U.S. PAT
United States Pat. No.'s 4,299,258 • 4,438,090

Roach Proof

ODORLESS NON-STAINING I
WWW.COPPERBRITE.C

CAUTION: KEEP OUT OF REACH OF
(SEE DIRECTIONS AND CAUTIONS ON BA

FOR USE IN:

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

NOTIFICATION
DEC 17 2002

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For University studies visit our website: 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, 4,461,757 • Japan Pat. No. 1,412,411

NEW ADDITIONS ARE HIGHLIGHTED

LEWIS & HARRISON

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs

HAND DELIVERED

December 6, 2002

U.S. Environmental Protection Agency
Insecticide/Rodenticide Branch
c/o Document Processing Desk [NOTIFY]
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTENTION: *Marion Johnson*
Product Manager, Team 10

SUBJECT: *Copper Brite, Inc.*
Roach Prufe (EPA Reg. No. 9608-2)
Labeling Notification to Add Language Required by the State of California

Dear Mr. Johnson:

As Agents for Copper Brite, Inc. ("Copper Brite"), we are submitting a "Notification" to add personal protective equipment language required by California's Department of Pesticide Regulation (CDPR) for all boric acid-containing products to the **Roach Prufe** label.

The proposed language will read:

"Protective Equipment for New Construction: Wear normal work clothing (e.g., long-sleeve shirt, long pants, shoes plus socks) and a NIOSH/MSHA approved dust mask respirator."

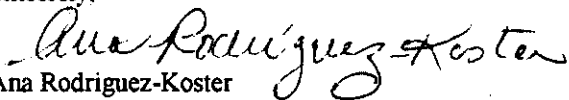
Enclosed please find the following documents in support of this Notification:

1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
2. One copy of the proposed labeling with the changes highlighted; and,
3. Two clean copies of the proposed labeling.

Insofar as Lewis & Harrison serves as the "Company Contact" and "Company Agent" for Copper Brite, Inc., please relay all correspondence regarding this notification submission directly to us. If you have any questions, please call me at (202) 393-3903 x. 17 or e-mail me at alkoster@lewisharrison.com.

I thank you in advance for your cooperation.

Sincerely,


Ana Rodriguez-Koster
Agent for Copper Brite, Inc.

Enclosures

cc: Terry Brite, Copper Brite, Inc.