44757-3

11/26/2002

NOV 2 6 2002

InCide Technologies, Inc. 50 N. 41st Avenue Phoenix, AZ 85009

Dear Mr. Blasius:

Subject: Label Revisions Product Name: Zone Defense EPA Registration No. 44747-3 Application date: June 26, 2002

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 comment listed below. Five copies of the finished labeling must be submitted.

1) For the purpose of clarity and consistency with other labels, in accordance with P.R. Notice 2001-6, revise the **Disposal Statement** to read:

Do not Puncture or Incinerate! If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership. Refer to PR Notice 2002-6 for detailed instructions.

2) Enclosed is a copy of your stamped revised label. Submit five (5) copies of the final printed labeling before you release the product for shipment.

Pg 2 EPA Reg. No. 44757-3

To expedite handling, please return a copy of this letter along with your final printed labeling to Ms. Pat Quarles. If you have any questions regarding this letter, I can reach at 703-305-6876.

Sincerely,

Joseph Tavano Acting Product Manager 10 Insecticide Branch Registration Division 7505

enclosure



PRECAUTIONARY STATEMENTS HAZARDS 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.

DIRECTIONS FOR USE

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

This product may be used in homes, restaurants, and other food and food handling establishments, 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, tiltist, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities, sewers and animal confinement areas.

DOMESTIC (HOMEOWNER) USE

Use Restrictions: Children and pets should not be in treatment area until after application is complete. Do not treat pets with this product. Avoid contamination of feed and foodstuff. Avoid contamination of ornamental niante

Application Directions For Control Of Cockroaches, Ants, and Silverfish: Apply liberally, scattering under and behind refrigerator, stove, sink, distivasher, washing machine and dryer, tubs, into openings around drains, water pipes and electrical conduits; and in cracks and cravices 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. Any powder visible after application must be brushed into cracks and crevices or vacuumed. Reapply as necessary.

Application Directions For Control Of Darking Beeties (Lesser Meahworms): Remove all birds in pouttry or layer houses before applying. Using a fertilizer or seed spreader, uniformly apply Zone Defense powder at the rate of 1 to 2 pounds per 100 square feet over old litter or soil surface of the poultry house. pounds per 100 square feet over old litter or soll surface of the poulity house. Liberally dust side walls, posts, top plates, and framing. Apply powder in cracks and crevices around insulation on the floor and sidewalls. Zone Defense can also be spray applied wet when mixed 1 to 2 pounds per three pallons of water for each 100 square feet of surface to be treated. DO NOT APPLY DIRECTLY TO MANURE. Evenly spread fresh litter a minimum of four inches over all treated floor surfaces before introducing birds. Reapply as outlined above after each grow-out. Reapply after each sanitizing and washed down of the poultry containment area to continue beetle control.

NON-DOMESTIC USE

(NONEDIBLE PRODUCT AREAS ONLY)

Use Restrictions: 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.

Directions for Applying in New and Existing Construction to Control Cockroaches and Other Target Insects: When treating large areas, such as wall voids, soffit and subcabinet voids in new and existing construction, dust

Bergily Ising dusting application equipment. Directions for Applying in Severs and Manbole Castlies: Apply this product

- Directions for Applying as a Mog Solution to Control Coctroaches:

UNFOLIONS TO Approving as a more solution to Control Cockroaches: Mixing and Application Directions: Add 1 cup of powder to each gallon of rinse water. Apply to floor areas only. Make only enough for each application. Supplemental treatment linkyfrazpoly as necessary. Any powder visible after application must be burghed into cracks and crevices or vacuumed. Avoid contamination of feed and foodstuffs.

(INCLUDING PALMETTO BUGS AND WATERBUGS)

ALSO DARKLING BEETLES ANTS & SILVERFISH

Active Ingredient: Orthoboric Acid Inert Ingredients	64.00% 36.00%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT:

IF SWALLOWED: Call a 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 IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

NET WEIGHT 30 LB. (13.62kg) See Side Panel For Additional Cautions EPA REG. NO. 44757-3 EPA EST No. 44757-AZ-1 Made in the U.S.A



FOOD HANDLING ESTABLISHMENTS

Places other than private residences in which food or feed is held, processed, prepared, or served.

1. FOOD AREAS (INCLUDING SOME SERVING AREAS)

Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, daines, edible oils, syrups). Also includes some SERVING AREAS.

FOOD SERVING AREAS

SERVING AREAS are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered FOOD AREAS when food is exposed and the facility is in operation. Follow application directions in this section, if food is not exposed and facility is not in operation, follow application directions under NON-FOOD SERVICE AREAS below

Use Restrictions: FOOD AREA application is limited to CRACK AND CREVICE TREATMENT ONLY. Applications to other areas are not permitted.

Application Directions: Apply in small amounts directly into cracks and crevices using a bulbous duster or other suitable equipment capable of applying insecticides 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 cockroaches hide.

2. NONFOOD AREAS (INCLUDING SOME SERVING AREAS)

includes 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). Also includes some SERVING AREAS.

NONFOOD SERVING AREAS

SERVING AREAS are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered NONFOOD AREAS when food is not exposed and the facility is not in operation.

Follow application directions in this section. If food is exposed and the facility is in operation, follow application directions under FOOD SERVING AREAS

Application Directions: 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.

OTHER NONFOOD AREAS

Application Directions: 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.

STORAGE AND DISPOSAL

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

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STORAGE: Store in a 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: Do not reuse container. Rinse thoroughly before discarding in trash.

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ACCEPTED with CONNENTS In EPA Letter Dated

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