FEB 1 / 2004

INCIDE TECHNOLOGIES, INC. 50 N. 41st Ave Phoenix AZ 85009

Dear Mr. Blasius:

Subject: Label Amendment (PR Notices 2001-1

Product Name: ZONE DEFENSE EPA Registration No. 44757-3

Application Date: November 17, 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 is acceptable, and stamped copy is enclosed for your records.

Sincerely

Richard Gebken

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

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, cellulose insulation, cotton batting industrial plants, theaters, ships, boats, 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

Application Directions For Control Of 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 al 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 Darkling Beetles (Lesser Mealworms): Remove all birds in poultry 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. 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 Targel insects: When treating large areas, such as wall voids, soffit and subcabinet voids in new and existing construction, dust liberally using dusting application equipment.

Directions for Applying in Sewers and Manhole Cavities: Apply this product dry or mixed with water, or acrylic polymer for improved adhesion to sewer wall cavity surfaces, at a rate not to exceed 12 oz per 190 square feet using portable blowers, air pressure tanks or pressurized nozzle(s)

Directions for Applying as a Mop 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 only. Reapply as necessary. Any powder visible after application must be brushed 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

Total

64.00% 36.00% 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If Swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a class of water if able to swallow. Do not induce vorniting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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

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 it 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 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment

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

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



Manufactured By: 50 North 41st Avenue Phoenix, AZ 85009-4618 1-800-777-4569 Made in 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, dairies, edible oils, and 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

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. HONFOOD AREAS (INCLUDING SOME SERVING AREAS)

Includes garbage rooms, lavatories, floor drains (to sewer), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages. mon 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 lood is prepared or held. These areas are considered NONFOOD AREAS when food is not exposed and the facility is not in

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

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

PESTICIDE 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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