



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 14, 2020

Leanna Bosarge  
Director, Regulatory Affairs  
Control Solutions, Inc.  
5903 Genoa Red Bluff  
Pasadena, Texas 77507

Subject: Registration Review Label Mitigation for Indoxacarb  
Product Name: CSI 15-107A2 Indox Roach Gel Bait  
EPA Registration Number: 53883-424  
Application Date: June 3, 2019  
Decision Number: 564963

Dear Ms. Bosarge:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Indoxacarb Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

Page 2 of 2  
EPA Reg. No. 53883-424  
Decision No. 564963

If you have any questions about this letter, please contact Jaclyn Pyne by phone at 703-347-0445, or via email at [pyne.jaclyn@epa.gov](mailto:pyne.jaclyn@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

[Text in brackets and italics are notes to the label editor.]  
[Text in brackets alone are optional statements or alternative statements.]

MASTER LABEL – Unless otherwise noted, all text shown prior to the start of sub-label A will be present on both sub-label A and sub-label B when printed.

Indoxacarb	Group	22A	INSECTICIDE
------------	-------	-----	-------------

# CSI 15-107A2 Indox Roach Gel Bait

FOR USE IN COMMERCIAL, INDUSTRIAL, INSTITUTIONAL AND RESIDENTIAL AREAS [Sub-Label A]  
FOR USE IN RESIDENTIAL AREAS [Sub-Label B]

### ACTIVE INGREDIENTS:

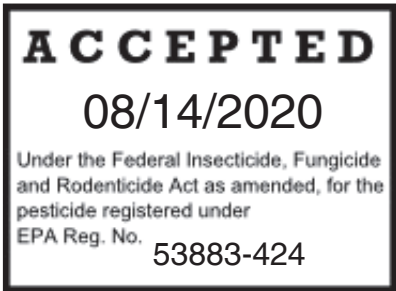
Indoxacarb ..... 0.6%

OTHER INGREDIENTS: ..... 99.4%

TOTAL: ..... 100.00%



**Manufactured for:**  
Control Solutions, Inc.  
5903 Genoa Red Bluff  
Pasadena, TX 77507



EPA Reg. No: 53883-424  
EPA Est. No: \_\_\_\_\_  
Net Contents: \_\_\_\_\_

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® International for emergency medical treatment at (866) 897-8050.

**DO NOT TREAT AREAS THAT ARE EASILY ACCESSIBLE TO CHILDREN AND PETS.**

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

All handlers must wear long-sleeved shirts, long pants, shoes and socks. [Note to reviewer: only on Sub-Label A]

#### ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

### PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment where possibility of shock hazard exists.

### SUB-LABEL A: COMMERCIAL USE LANGUAGE

#### DIRECTIONS FOR USE

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

Use CSI 15-107A2 Indox Roach Gel Bait as a spot or crack and crevice treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches.

CSI 15-107A2 Indox Roach Gel Bait is designed to control pest species of cockroaches such as German, American, Australian, Smoky-Brown, Brown, Asian, Oriental, and Brown-Banded.

#### USE RESTRICTIONS:

- Do not treat areas that are easily accessible to children and pets.
- Do not treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- Do not allow open foods to contact gel material.
- Do not apply CSI 15-107A2 Indox Roach Gel Bait to surfaces recently treated with repellent residual sprays.
- Do not apply repellent residual sprays to surfaces treated with CSI 15-107A2 Indox Roach Gel Bait.
- In pet shops and zoos place bait out of reach of pets and zoo animals.

#### APPLICATION DIRECTIONS

Apply CSI 15-107A2 Indox Roach Gel Bait to areas frequented by cockroaches such as between different elements of construction, between equipment and floors, openings leading into voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, and behind and under appliances, cabinets, sinks, closets, and any other equipment that cockroaches are typically known to hide.

Treatment Rates for All Uses		
Cockroach Infestation Level	Treatment Rate	Specific Instructions
Heavy	3 to 5 spots per 10 linear feet	<ul style="list-style-type: none"><li>• Each spot of CSI 15-107A2 Indox Roach Gel Bait must equal about 0.5 grams (approx. 1/4" diameter)</li><li>• When a bead of CSI 15-107A2 Indox Roach Gel Bait is used, apply a small thin bead that is less than 1/8" wide and approximately 2 inches long.</li></ul>
Light to Moderate	1 to 3 spots per 10 linear feet	

#### INDOOR USE DIRECTIONS

CSI 15-107A2 Indox Roach Gel Bait can be used in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments, including warehouses, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, apartment buildings, bakeries, beverage plants, breweries, bottling facilities, candy plants, canneries, cereal processing and manufacturing plants, dairies and dairy product processing plants, frozen food plants, schools,

laboratories, computer facilities, sewers, aircraft, buses, boats/ships, trains, homes, houses, industrial buildings, office buildings, kennels, kitchens, manufacturing facilities, spice plants, stores, wineries and similar structures, mausoleums, meat processing and packaging plants, meat and vegetable canneries, pet shops, and zoos. Non-food/non-feed areas include bedrooms, living rooms, bathrooms, closets, media rooms, garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling). This product may also be used in food/feed areas of food/feed handling establishments as outlined below.

- Infested areas must be carefully inspected to determine overall infestation levels, locations of harborage areas, and most appropriate application points.
- Apply CSI 15-107A2 Indox Roach Gel Bait as a small spot of material, approximately 0.5 grams (approx. 1/4" in dia.), to areas not able to be contacted by children or pets.
- Several small applications distributed within an area are more effective than 1 or 2 applications of large quantities. In some cases, a small thin bead (less than 1/8" wide and 2" long) may be appropriate such as between construction elements or other cracks and crevices.
- Indoor applications include cracks and crevices along walls or floors, behind or under equipment, under tables, within framing of tables or furniture, around sinks, within or near garbage collection areas, attics, crawl spaces, and cracks and crevices in cabinets.
- Inspect CSI 15-107A2 Indox Roach Gel Bait placements periodically for consumption or attractiveness and reapply as needed.

#### **APPLICATIONS IN FOOD/FEED HANDLING AREAS**

Apply in food/feed areas of food handling establishments as a crack and crevice treatment only. Apply Advion Cockroach Gel Bait directly into cracks and crevices by placing the bait dispenser tip approximately 1/2 inch into cracks, crevices, holes and similar openings where cockroaches are found or are entering.

Food and feed handling areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas are also considered a food/feed area when food is exposed and facility is in operation.

- Do not apply CSI 15-107A2 Indox Roach Gel Bait to areas where food/feed, food utensils or food processing surfaces may come into contact and become contaminated.
- Do not apply CSI 15-107A2 Indox Roach Gel Bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation and prepared food holding surfaces as bait could be removed by the washing.
- Do not apply CSI 15-107A2 Indox Roach Gel Bait to surfaces where the temperature exceeds 120-130°F because this could cause the bait to liquefy and lose effectiveness.
  - Examples include, but are not limited to, parts of stoves, ovens, grills, fume hoods, saunas, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- Use good application practice to avoid movement of CSI 15-107A2 Indox Roach Gel Bait to exposed surfaces used for food preparation.
- If CSI 15-107A2 Indox Roach Gel Bait contacts an exposed surface/first remove as much of the gel bait as possible, then wash with soap and water.

### APPLICATIONS IN NON-FOOD/NON-FEED HANDLING AREAS

CSI 15-107A2 Indox Roach Gel Bait is designed to be used as a spot and crack and crevice treatment in non-food areas such as behind baseboards, behind cabinetry, under shelves/racks, garbage rooms, machine rooms, boiler rooms, garages, mop closets, storage rooms (after canning/bottling), locker rooms, lavatories, entry ways, floor drains (to sewers), and offices. If making applications in food/feed handling areas, refer to section above: Applications in Food/Feed Handling Areas.

### OUTDOOR USE DIRECTIONS

A thorough inspection around a structure may reveal areas where cockroaches are gaining access. Attempts should be made to remove the access. Apply CSI 15-107A2 Indox Roach Gel bait as a spot or thin bead (see above) to pest entry sites such as along windows, doors, between construction elements, sewer areas, adjacent trees which harbor cockroaches, along walls, garbage holding areas, or suitable placement site acting as a cockroach harborage. Place baits in such a way as to reduce the potential of subsequent human contact. Inspect CSI 15-107A2 Indox Roach Bait Gel placements periodically and apply fresh bait as needed.

### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in a cool, dry area out of reach of children and pets.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL: Nonrefillable Container:** Do not reuse or refill this container. Offer for recycling if available. Place empty bait dispensers in trash. **If partially filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

### LIMITATION OF WARRANTY AND LIABILITY

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. **CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF**

**FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

**IT IS CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT** in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.

## **SUB-LABEL B: CONSUMER USES**

### **DIRECTIONS FOR USE**

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

CSI 15-107A2 Indox Roach Gel Bait is designed to control pest species of cockroaches such as German, American, Australian, Smoky-Brown, Brown, Asian, Oriental, and Brown-Banded.

### **USE RESTRICTIONS:**

- Do not treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- Do not apply bait gel to areas which have been recently sprayed with a repellent insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.
- USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS.
- Do not apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation, and prepared food holding surfaces as bait may be removed by washing.
- Do not apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- Do not apply gel to exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface.
- Do not apply in areas exposed to direct sunlight.

If needed, gel bait deposits may be cleaned up with a damp paper towel or rag, or if dried, use a putty knife to scrape and discard in trash.

### **WHERE TO USE:**

Indoors in kitchens, bathrooms, basements, garages and laundry rooms as a crack and crevice, spot treatment or bait station application. Apply to areas frequented by cockroaches such as openings leading to voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, and behind and under appliances and cabinets where cockroaches are typically known to hide.

Outdoors as a spot, thin bead or bait station application at pest entry sites such as along windows and doors, sewer areas, adjacent trees that harbor cockroaches, utility entry points, along walls, garbage holding areas, and other locations that serve as harborage for cockroaches. Select bait gel placement locations to help reduce the potential for subsequent human contact.

### **HOW TO APPLY (DIRECTLY FROM SYRINGE):**

Cockroaches prefer pressure on two sides of their body and spend 75% of their existence living in cracks and crevices. For this reason, syringe applications directly in cracks and crevices will go a long way in eradicating the cockroach population.

For light to moderate infestations, apply 1 to 3 spots of this gel bait per 10 linear feet or one square yard. For heavy infestations, use 3 to 5 spots of gel bait per 10 linear feet or one square yard. Each bait spot should equal about 0.5 grams (1/4" diameter spot).





Figure 1: Spot of gel bait approx. 0.5 gram

For all levels of cockroach infestation, you can also apply this gel bait in lines approximately 1/8-inch wide by 2 inches long. Inspect placements of gel bait periodically and apply fresh bait as needed.



Figure 2: Line of gel bait approximately 1/8 inch by 2 inches

For bait spots or lines:

- Remove cap from syringe tip.
- Place syringe tip at the surface to be treated.
- Apply light pressure to the plunger of the syringe.
- After dispensing gel bait, replace cap on syringe tip.

#### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in a cool, dry area out of reach of children and pets.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL: Nonrefillable Container:** Do not reuse or refill this container. Offer for recycling if available. Place empty bait dispensers in trash. **If partially filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

#### LIMITATION OF WARRANTY AND LIABILITY

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. **CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY**

**EXCEPT AS STATED ABOVE.**

**IT IS CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT** in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.

**UNIT LABEL FOR CSI 15-107A2 Indox Roach Gel Bait**  
*[Applicable for both commercial and consumer products]*

**CSI 15-107A2 Indox Roach Gel Bait**

NOTE: Do not remove this label. Use only in areas not easily accessible to children and pets.

**ACTIVE INGREDIENTS:**

Indoxacarb .....0.6%

**OTHER INGREDIENTS:** .....99.4%

**TOTAL:** .....100.00%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

Keep gel away from foods and food contact surfaces. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling.

**CONTAINER DISPOSAL: Nonrefillable Container:** Do not reuse or refill this container. Offer for recycling if available. Place empty bait dispensers in trash. **If partially filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Control Solutions, Inc.  
5903 Genoa Red Bluff  
Pasadena, TX 77507-1041

EPA Reg. No. 53883-424  
EPA Est. No. \_\_\_\_\_

NET WT. \_\_\_\_\_

SEE [OUTER CARTON][PACKAGE LABEL] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

***[Optional Marketing Claims:]***

*[Use Related]*

- For crack and crevice cockroach control
- Use in cracks and crevices
- Use in cracks and crevices against cockroaches
- For hard to reach places [such as cracks and crevices]
- Ready to Use
- Easy to use [apply] [; nothing to activate]
- Designed [Ideal] for use in kitchens
- For indoor and outdoor (adjacent to home -or- structure) use [cockroach control]
- Kills cockroaches where you can't find them
- Kills cockroaches you don't see
- Kills cockroaches you see and [even] those you don't
- Works inside and outside (adjacent to home -or- structure)
- Gets bait where cockroaches live
- Easy [way] to apply bait
- Where to use: In and around homes and other [buildings] [structures] where roaches have infested or where they travel to seek food, water or shelter.
- When to use: When cockroaches are observed or there is evidence of an infestation in or around homes and building.

*[Formulation/Applicator Related]*

- Contains No "Big 8" Allergens\*
- No messy residue
- No mixing required
- Precision syringe applicator
- Convenient [syringe] applicator

\*Milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat or soybeans.