



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

November 6, 2024

Haley Wade
Lead Regulatory Reviewer
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: PRIA Label and CSF Amendment – Approval of New Basic & Alternate #1 CSFs
and Review of New Efficacy Data for Premise Treatments
Product Name: CSI 15-107A2 Indox Roach Gel Bait
EPA Registration Number: 53883-424
Application Date: May 16, 2023
Case Number: 479155

Dear Haley Wade:

The amended label and Confidential Statement(s) of Formula (CSFs) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF, dated August 1, 2023
- Alternate #1 CSF, dated August 1, 2023

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 FIFRA 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) lists 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.

Your release for shipment of the product 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.

If you have any questions, please contact Carmen Rodia via e-mail at Rodia.Carmen@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tamica Cain".

Tamica L. Cain, Product Manager 10
Invertebrate-Vertebrate Branch 2
Registration Division (7505T)

Enclosure: *Stamped "Accepted" Master Label, dated November 6, 2024*

{Note to reviewer: Text in brackets [] and italics are notes to the label reviewer.}
{Text in parentheses [] alone are optional or alternative statements is optional and may or may not appear on the end-use label.}

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
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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%

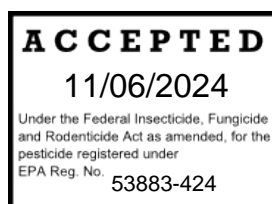
OTHER INGREDIENTS:..... 99.4%

TOTAL: 100.0%

*Contains 0.0634 pound of active ingredient per gallon of formulated product.



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



EPA Reg. No: 53883-424
EPA Est. No: _____
Net Contents: _____

KEEP OUT OF REACH OF CHILDREN CAUTION / PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns or medical emergencies), you may also contact SafetyCall® International at 1-844-685-9173, twenty-four (24) hours per day, seven (7) days per week.

[[See inside label booklet for [additional] First Aid, Precautionary Statements, Directions for Use, and Storage and Disposal.] [See other panels for additional precautionary information.] [See below for additional Precautionary Statements]]

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 hands 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 shirt and long pants; and
- Shoes plus 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.

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 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 gel material to contact open foods.
- Do not apply this product to surfaces recently treated with repellent residual sprays.
- Do not apply repellent residual sprays to surfaces treated with this product.
- Place bait out of reach of pets and animals.

PRODUCT INFORMATION

Use this product as a spot or crack and crevice treatment indoors to kill listed cockroaches. This product is designed to kill American and German cockroaches.

APPLICATION DIRECTIONS

Apply this product to areas frequented by listed cockroaches and their harborage sites indoors. Apply bait where listed cockroaches are suspected or observed, including between different elements of construction, entry points, between equipment and floors, voids, 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 or furniture where 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">• Each spot of this product must equal about 0.5 grams (approx. 1/4" diameter)• When a bead of this product is used, apply a small thin bead that is less than 1/8" wide and approximately 2 inches long.
Light to Moderate	1 to 3 spots per 10 linear feet	

INDOOR USE DIRECTIONS

This product can be used in residential areas, food/feed establishments, both non-food/non-feed areas and food/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, daycares, laboratories, computer facilities, floor drains (to sewers), airports, 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).

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.

- [For best results, carefully inspect infested areas to determine overall infestation levels, locations of harborage areas, and most appropriate application points.]
- Apply this product as a small spot of material, approximately 0.5 grams (approx. ¼" in dia.), to areas inaccessible to children or pets.
- Several small applications distributed within an area are more effective than 1 or 2 applications of large quantities.
- Indoor applications include cracks and crevices along walls or floors, behind or under equipment and appliances, 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 [this product] [gel bait] placements periodically for consumption or attractiveness and reapply as needed.

Wax Paper Application: For application in areas such as under appliances or in similar area, apply the bait using 2-3" wax paper squares at the rate of 0.5 grams per spot, and fold the wax paper over the bait. Place the folded wax paper containing the bait into the appropriate bait placement location. Wax paper squares can easily be inspected, removed and/or replaced as needed. Please note that the waxed paper does not prevent bait desiccation.

Vertical Applications: For applications to vertical surfaces including walls, the sides of appliances, and cabinets, masking, painter's, or similar tape may be used at the rate of 0.5 grams per spot. Put the tape on first and then apply the bait to the tape surface. When it is time to replace the bait, simply peel the tape away and repeat with new tape and fresh bait. Please note that the tape does not prevent bait desiccation.

APPLICATIONS IN FOOD/FEED HANDLING AREAS

Apply in food/feed areas of food handling establishments as a crack and crevice treatment only. These applications may be made while the facility is in operation. Apply [this product] [the 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.

- Do not apply this product to areas where food/feed, food utensils, or food processing surfaces may come into contact and become contaminated.

- Do not apply this product 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 this product to surfaces where the temperature exceeds 120-130°F because this could cause the bait to liquefy and lose effectiveness.
 - Examples include 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 this product to exposed surfaces used for food preparation.
- If this product contacts an exposed surface, [first] remove as much of the gel bait as possible, and then wash with soap and water.

APPLICATIONS IN NON-FOOD/NON-FEED HANDLING AREAS

This product can 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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep this product in its tightly closed original container when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

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

CONTAINER HANDLING: 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 must 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. To the extent permitted by applicable law, 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. To the extent permitted by applicable law, **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.**

To the extent permitted by applicable law, 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.

This product is designed to kill American and German cockroaches.

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.
- DO NOT USE IN AREAS 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 surfaces, 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, scraped with a putty knife and discarded in the trash.

WHERE TO USE:

Apply indoors in kitchens, bathrooms, basements, garages and laundry rooms as a crack and crevice or spot 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.

HOW TO APPLY (DIRECTLY FROM SYRINGE):

Cockroaches prefer pressure on two sides of their body and spend 75% of their existence hiding in cracks and crevices. For this reason, syringe applications directly in cracks and crevices [will go a long way in eradicating the cockroach population] [is an effective way to kill cockroach infestations].

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

Inspect placements of gel bait periodically and apply fresh bait as needed.

For bait spots:

- Remove cap from [syringe] [bait applicator] tip.

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

Wax Paper Application: Wax Paper Application: For application in areas such as under appliances or in similar areas, apply the bait using 2-3" wax paper squares at the rate of 0.5 grams per spot, and fold the wax paper over the bait. Place the folded wax paper containing the bait into the appropriate bait placement location. Wax paper squares can easily be inspected, removed and/or replaced as needed. Please note that the waxed paper does not prevent bait dessication.

Vertical Applications: For applications to vertical surfaces including walls, the sides of appliances, and cabinets, masking, painter's, or similar tape may be used at the rate of 0.5 grams per spot. Put the tape on first and then apply the bait to the tape surface. When it is time to replace the bait, simply peel the tape away and repeat with new tape and fresh bait. Please note that the tape does not prevent bait dessication.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep this product in its tightly closed original container when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

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

CONTAINER HANDLING: 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 must 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. To the extent permitted by applicable law, 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. To the extent permitted by applicable law 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.**

To the extent permitted by applicable law, 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 animals.

ACTIVE INGREDIENTS:

Indoxacarb*0.6%

OTHER INGREDIENTS:.....99.4%

TOTAL:100.0%

*Contains 0.0634 pound of active ingredient per gallon of formulated product.

KEEP OUT OF REACH OF CHILDREN

CAUTION /PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

[[See inside label booklet for [additional] First Aid, Precautionary Statements, Directions for Use,
and Storage and Disposal.] [See other panels for additional precautionary information.] [See
below for additional Precautionary Statements]]

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

CONTAINER HANDLING: 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 Rd.
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]

- 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 [cockroach] [use]
- For indoor use in commercial, industrial, and residential areas
- 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
- Gets bait where cockroaches live
- Easy [way] to apply bait
- Where to use: In 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 homes and buildings.
- Kill [cock]roaches where they [live] [hide] [and breed]
- Kills cockroaches where they [live] [hide] [and breed]
- Use indoors
- No mixing needed
- Kills German cockroaches [in 5 days]
- Kills cockroaches in 9 days
- [Kills] [American] [German] [cockroaches]

[Formulation/Applicator Related]

- Contains No "Big 8" Allergens*
- No messy residue
- No mixing required
- Precision syringe applicator
- Convenient [syringe] applicator
- No [vapor] [fumes] [odor]
- No mess
- Great value
- Economy pack
- No [other] [additional] [tools] [sprayer] needed [, [simply] apply directly from the syringe]
- Apply [directly] with [the] syringe applicator
- Ready-to-Use [cock][roach] [bait]

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