

SEP 23 2003

R Value/West
P.O. Box 24632
Los Angeles, CA 90024

Dear Mr. Mackson:

Subject: Response to PR Notices 2001-1 & 2001-6
Product Name: M7 Roach Killer Mop-on-Insecticide
EPA Registration No. 54089-1
Application date: April 25, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable, subject to the comments below.

- 1) Correct the sentence "**Never place unused product own any indoor or outdoor**" to read "**Never place unused product down any indoor or outdoor drain.**"
- 2) Consistent with Registration Eligibility Decisions for Boric Acid and its Sodium Salts. the following changes must be made to the product label:

Revise the "Precautionary Statement" to read as follows:

Hazard to Humans and Domestic Animals

Caution

Harmful if swallowed or inhaled. Causes 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.

- 3) The Confidential Statement of Formula is not in compliance with PR Notice 91-2. The nominal concentration of the active ingredient (99.4%) is not in agreement with the label claim nominal concentrate of (98%). Revise your Confidential Statement of Formula, accordingly.

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- 4) Submit four(4) copies of the final printed labeling for review.

To expedite handling, please return a copy of this letter with your final printed labeling.
If you have any questions regarding this letter, please call Ms. Pat Quarles at (703)305-6876.

Sincerely,



Linda Arrington
Acting Product Manager 10
Insecticide Branch
Registration Division 7505

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS
AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. May cause eye irritation. Avoid eye contact. Wash thoroughly after handling.

For Use In:

Hospitals, Restaurants, Military Bases, Nursing Homes, grocery Stores, Schools, Hotels, Ships, Yachts, Theaters, Zoos, Kennels, Markets, Boats, Buses, Utilities and Sewers.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not use in edible product areas of food processing plants or on counter tops and other surface areas where food is prepared. Do not use in serving areas while food is exposed.

Mixing and Application Directions:

Add one cup of powder (4oz.) to each pail (5gal.) of mop or rinse water. Dissolve instantly in water. Apply to floor areas only. Make only enough for each application. Designed for use as a supplemental treatment to exterminating service or to M5 Roach Kill. Avoid contamination of feed and foodstuffs. Use daily in areas with severe infestation. In normal use, apply daily for 10-15 days and then every other day thereafter to maintain residual. If use is discontinued for a week, use daily for 10 days thereafter to rebuild residual.

Food areas and Food Serving Areas: Apply only when food is not exposed and facility is not in operation. Avoid treating surfaces likely to be contacted by food.

HELP PREVENT COCKROACH INFESTATION
WHILE CLEANING FLOORS.



M7
Mop-on
Insecticide

Kills Roaches and Silverfish

Active Ingredients:

Disodium Octaborate Tetrahydrate* 98%

Inert Ingredients: 2%

TOTAL 100%

*4.9 lbs. provides 1 lb. of Boron

CAUTION

KEEP OUT OF REACH OF CHILDREN

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 54089-1

EPA Est. No. 11474-CA-01

Manufactured By: R Value/West

P.O. Box 24632

Los Angeles, CA 90024

NET WEIGHT **ACCEPTED**

with **COMMENTS**

In EPA Letter Dated:

SEP 23 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

54089-1

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 INSTRUCTIONS:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency for disposal instructions. Never place unused product down many indoor or outdoor drain

FIRST AID

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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.

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 advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 9-1-1 or an ambulance then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? 1-800-463-6179 or call poison control center.

Buyer assumes all the risks of use storage or handling of this product not in strict accordance with directions given herewith.

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