



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
 PREVENTION, PESTICIDES
 AND TOXIC SUBSTANCES

April 24, 2008

Ms. Peggy M. Galloway,
 Regulatory Agent for Buddies Puddy Company
 c/o Landis International, Inc.
 P.O. Box 5126
 Valdosta, GA 31603-5126

Subject: Review of Revised Labeling
Buddies Puddy, EPA Registration No. 57727-1
Your Submission Dated January 23, 2008

Dear Ms. Galloway:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

First Aid section comment(s):

1. Based upon the acute toxicity categories for Buddy's Puddy, add the following line of text immediately preceding the line entitled "If in eyes:" as follows:

If on Skin or Clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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2. Replace the last line of text with:

<p>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, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx or the National Pesticide Information Center at 1-800-858-7378.¹</p>
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Precautionary Statements section, Hazards to Humans and Domestic Animals subsection comment(s):

3. Replace the existing section with:

<p>PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS CAUTION</p>
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<p>Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with plenty of soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.</p>
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¹ Please note that the "1-800-xxx-xxxx" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

Directions for Use section comment(s):

4. Replace the existing section with:

"DIRECTIONS FOR USE

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

READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL.

Use this product in homes, restaurants and other food and feed handling establishments, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, industrial plants, theatres, ships, boats, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities and sewers.

To control cockroaches, ants and silverfish, apply under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer and 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 all lower drawers in kitchen and bathroom cabinets, bedroom dressers and chests of drawers, and then apply in drawer wells.

To apply, squeeze thin strip of gel on or into target areas. Reapply as necessary. Apply only in areas inaccessible to children and pets. Avoid contamination of feed and/or feedstuffs.

**FOOD AREA APPLICATION LIMITED TO
CRACK AND CREVICE TREATMENT ONLY**

FOOD AND FEED HANDLING ESTABLISHMENT – Places other than private residences in which food or feed is held, processed, prepared or served.

Apply in small amounts 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. Do not contaminate food or food processing surfaces.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE PROHIBITED.

SERVING AREAS – Apply as a spot treatment to selective surfaces such as baseboards, under elements of construction into cracks and crevices. Do not treat surfaces likely to be contacted by food. Do not apply when facility is in operation or when foods are exposed.

NON-FOOD AREAS – Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, enclosed processing systems (mills, dairies, edible oils, syrups), 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).

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."

Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. A stamped copy of the label is attached for your records. If you have any questions regarding the label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Enclosure
057727-00001 D-382146

BUDDIES PUDDY

ACTIVE INGREDIENT

Boric Acid.....50%

OTHER INGREDIENTS.....50%

TOTAL.....100%

KEEP OUT OF REACH OF CHILDREN AND DOMESTIC ANIMALS

CAUTION/CAUTELA

**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 Back Panel for Additional Cautions

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • 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 swallowed	<ul style="list-style-type: none"> • 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.
<p>Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu). During other times, call the poison control center 1-800-222-1222.</p>	

NET CONTENTS: 16OZS.

EPA REG. NO. 57727-1

EPA EST NO. 57727-GA-01

Manufactured By:

BUDDIES PUDDY COMPANY

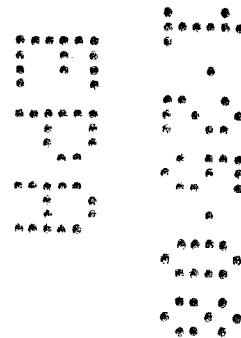
449 Ritch Church Rd., Screven, GA 31560-8649

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

April 24, 2008

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

57727-1



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

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

DIRECTIONS FOR USE

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

To control cockroaches, ants and silverfish, apply 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, bedroom dressers and chests of drawers, then apply in drawer wells.

To apply, squeeze thin strip of gel on or into target areas. Reapply as necessary. Apply only in areas inaccessible to children and pets. Avoid contamination of feed and foodstuffs.

This product may be used in homes, restaurants and other food and feed handling establishments, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, industrial plants, theatres, ships, boats, trains, trucks, yachts, camps, mobiles homes, buses, zoos, kennels, military bases, libraries, utilities and sewers.

CRACK AND CREVICE TREATMENT

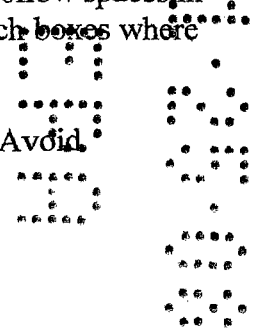
FOOD AND FEED HANDLING ESTABLISHMENTS – Places other than private residences in which food or feed is held, processed, prepared or served.

**FOOD AREA APPLICATION LIMITED TO
CRACK AND CREVICE TREATMENT ONLY**

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

Apply in small amounts 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.

Care should be taken to avoid depositing the product onto exposed surfaces. Avoid contamination of food or food processing surfaces.



APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENT, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

SERVING AREAS – Facilities where prepared foods are served, such as dining rooms, but excluding areas where food may be prepared or held.

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. (Do not apply when facility is in operation or foods are exposed.)

NON-FOOD AREAS – Include 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).

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.

STORAGE: Store in a cool, dry place inaccessible to children. Place in trash or offer for recycling if available.

DISPOSAL: *If empty:* Do not reuse or refill this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY STATEMENT

BUDDIES PUDDY COMPANY warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of BUDDIES PUDDY COMPANY. To the extent consistent with applicable law, BUDDIES PUDDY COMPANY shall not be liable for consequential, special, or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. To the extent consistent with applicable law exclusive remedy of any buyer or user of this product for any and all losses, injuries, or damages resulting from or in any way arising from the use, handling or application of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid for this product or at BUDDIES PUDDY COMPANY's election, the replacement of this product. BUDDIES PUDDY COMPANY MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

