SEP 27 1996

James R. Blasius R_x for Fleas, Inc. 6555 N.W. 9th Avenue, Suite 412 Ft. Lauderdale, FL 33309

Dear Mr. Blasius:

Subject: Revised Confidential Statement of Formula and Amended Product Labeling to Add Dust Mite Claims R_x for Fleas Plus
EPA Registration Number 59111-1
Submission Dated August 13, 1996

The confidential statement of formula referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. This revised confidential statement of formula (dated December 14, 1995) for the basic formulation supersedes all previously-submitted confidential statements of formula and will be added to the product file.

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

1. Revise the Statement of Practical Treatment to read:

IF SWALLOWED: Call a physician or Poison Control Center.

Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists.

Revise the Precautionary Statement to read:

"Harmful if swallowed. May cause eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling."

3. Revise the statement "See Side Panel for Additional Cautions" to read "See Side Panel for Additional Precautions".

A stamped copy of the label is enclosed for your records. Submit three copies of revised final printed labeling prior to releasing product for shipment.

If you have any questions or comments, please contact me at (703) 305-6788.

Sincerely,

BPK

Richard P. Keigwin, Jr. Product Manager 10 Insecticide-Rodenticide Branch. Registration Division (7505C)

[Front Panel]

Rx FOR FLEAS PLUS®

KILLS FLEAS.

ALSO KILLS COCKROACHES, ANTS, SILVERFISH, AND DUST MITES CONTROLS DUST MITE ALLERGENS

COORLESS PATENTED NON-STAINING

Active Ingredient: Orthoboric Acid

64.00%

Inert Ingredients:

36.00%

Total:

100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT: If swallowed, contact physician immediately. If in eyes, flush eyes with plenty of water. Get medical attention if irritation persists.

NET CONTENTS 30lb. (13.59 kg)

See Side Panel For Additional Cautions

Manufactured For Rx FOR FLEAS®, INC. 6555 N.W. 9th Avenue Suite 411 Ft. Lauderdale, FL 33309

EPA REG. No. 59111-1 EPA EST. No. 44757-AZ-1 ACCEPTED
With COMMENTS
In EPA Letter Dated

SEP 27 1996

Under the Federal Insecticide, Functione, and Federal diseased as accorded, Invited Production Registered under EPA Rog. No.

GUARANTEE: If not completely satisfied, return unused portion with proof of purchase directly to Rx FOR FLEAS, INC. for a full refund.

Made in U.S.A. Pat. Nos. 4289682 and 4156654 with additional patents pending. Canacian Pat. No. 1107909

[SIDE PANEL]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION:

HARMFUL IF SWALLOWED. MAY CAUSE EYE IRRITATION. AVOID EYE CONTACT: WASH THOROUGHLY AFTER HANDLING.

DIRECTIONS FOR USE

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

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, industrial plants, theatres, ships, boats, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities and sewers.

DOMESTIC (HOMEOWNER USE) FLEAS

Use Restrictions: Children and pets should not be in treatment area until after application is completed. Do not treat pets with this product. Avoid contamination of feed and foodstuff. Avoid contamination of ornamental plants.

Application Directions for Flea and Dust Mite Control: Apply to dry surfaces only. Apply directly on carpets where pets frequently traffic or sleep at the rate of one pound per 300 square feet. Work powder deep into fibers and mat with a broom or rug rake. Any powder visible after application must be brushed into carpet fibers or removed by vacuuming. Allow powder to remain for a period of three weeks to achieve maximum flea control in carpets. Reapply as necessary.

Additional Use Sites and Application Instructions: Remove loose cushions of upholstered furniture. Apply powder along creases and into corners and furniture wells. Do not apply product to exposed fabric. Work powder deep into wells and the surrounding hidden furniture fabric until it disappears. Apply powder lightly to all mattress, box spring, cushion and pillow surfaces that will be covered with sheets or like fabric after treatment. Any powder visible after application must be removed. Apply powder lightly to hardwood floor surfaces. Using a broom, completely work any visible powder into all cracks and crevices. Apply and brush in evenly 1 oz of product to each side of filters located in air returns of home heating/air conditioning systems. After applying to filters remove any non-adhearing powder by gently tamping filter on edge against a hard surface. Remove any product that becomes dislodged by vacuuming.

DOMESTIC (HOMEOWNER USE) COCKROACHES, ANTS AND SILVERFISH

Use Restrictions: Children and pets should not be in treatment area until after application is completed. Do not treat pets with this product. Avoid contamination of feed and foodstuffs. Avoid contamination of ornamental plants.

Application Directions for Cockroaches, Ant and Silverfish Control: 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 all 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 removed. Reapply as necessary.

NON-DOMESTIC USE (NONEDIBLE PRODUCT AREAS ONLY)

Use Restrictions: Children and pets should not be in treatment area until after application is complete. 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: 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 at a rate not to exceed 12 oz. per 190 sq. ft. using portable blowers or air pressure tanks.

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 removed. Avoid contamination of feed and foodstuffs.

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, 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 real exposed and facility is not in operation, follow application directions under NONFOOD SERVING AREAS below.

Use Restrictions: FOOD AREA application is limited to CRACK AND CREVICE TREATMENT ONLY. Applications to other areas are not permitted.

6/6

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.

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

2. NONFOOD AREAS (INCLUDING SOME SERVING AREAS)

Includes 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). Also includes some SERVING AREAS.

NONFOOD 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 NONFOOD AREAS when food is **not** exposed and the facility is not in operation.

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

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 baseboards 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 dry place. Do not store where children or animals my gain access.

PESTICIDE DISPOSAL: Wastes 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.