

DEC 18 1997

Stephen Smith
Maxforce Insect Control Systems
c/o PS & RC
P.O. Box 493
Pleasanton, CA 94566-0803

Dear Mr. Smith:

Subject: Maxforce Large Roach Bait F.03
EPA Reg. No. 64248-12
Your submission dated 9/16/97 & supporting data submitted 9/25/97

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

Delete the marketing claims referring to killing, destroying, or wiping out the roach harborage. The efficacy data does not support these claims.

Correct the technical name for the GABA regulated chloride channel.

Submit for the record (or cite) the technical material upon which you based your description (page two of the label) of how this product works.

All references to use outdoors must specify outdoors adjacent to structures or buildings.

While the total net weights (in U.S. units of measure) are not incorrect as a conversion from metric measure, it may make more sense to present them as 48 times the unit weight in ounces.

In previous reviews, EPA has stated that you may use "new" in your marketing statements for only six months from the date of registration. However, since Maxforce has only recently begun marketing fipronil roach bait products, you may use the marketing claim

| | | | | | | | |
|---------|---------|---------|--|--|--|--|--|
| SYMBOL | PM3 | 75058 | | | | | |
| SURNAME | Libold | MJL | | | | | |
| DATE | 12/5/97 | 12/7/97 | | | | | |

"new" only for six months after the date the product is first shipped from Clorox's warehouse.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

Marion J. Johnson, Jr.
Product Manager 3
Insecticide Branch
Registration Division (7505C)

SINGLES IN A RESEALABLE BAGTEAR HERE TO OPEN 

MAX FORCE[®]

LARGE ROACH BAIT F.03

for front or back:

- Kills roaches quickly
- Starts killing within 2 days
- [New] quick kill formula
- [New] fast action formula
- [New] kills roaches within 2 days
- A significant reduction will be apparent within 3 days/ 5 days/1 week
- Starts killing roaches in hours
- Significantly reduces visible roaches within 3 days/ 5 days/1 week
- Kills the roach harborage
- Destroys the roach harborage
- Kills the source of the roach problem
- Lets roaches kill roaches
- Kills roaches in the harborage
- Kills roaches where they hide/breed/live
- Kills roaches at the source
- Improved formula[!]
- Effectively kills roaches without a trace -- no fumes, no mess, no odor
- Ideal for kitchen use
- Hands off way to get rid of roaches
- Easy to use; nothing to activate.
- No vapors, no fumes, no mess, no odor
- The clean way to kill roaches, no clean-up
- Guaranteed to kill roaches
- Guaranteed day and night roach control
- Guaranteed to rid your home of roaches
- Guaranteed to protect your home from roaches
- Guaranteed to solve your roach problem
- Satisfaction -or- Quality Guaranteed
- Kills roaches where you can't find them
- Kills roaches - so you don't see them
- Kills two ways
- Dual killing action
- Dual kill formula
- Double action formula
- Kills roaches you don't see
- Kills roaches you see and [even] those you don't for complete protection
- Gets to the harborage[s] -- the source of the problem
- Wipes out the roach harborage[s]
- See dead roaches in 48 hours
- See dead roaches in {2-3} days
- Powerful results in just {2-3} days
- You should see results within {2-3} days
- See [visible] results within - or - in 48 hours
- 48 hour kill -or- action
- Fast acting -or- action formula
- Innovative, fast acting -or- action formula that quickly kills roaches
- Effective performance
- [Delivers] fast killing results
- Provides maximum roach control
- Starts working within hours and continues working
- Kills roaches fast before they multiply for long-term control
- Continuous action for [a]round the clock protection
- Works every minute of every hour of every day
- Works continuously, [24 hours a day.] [7 days a week]
- Works day after day/ works day and night
- Kills roaches before they become a problem
- Preventative maintenance against roaches
- Keeps roaches out of sight
- Stops roaches before they become a problem
- Protects -or- defends your home against roaches
- New!
- Patented [action] formula -or- ingredient
- Special formula
- New generation roach control
- Contains a totally unique insecticide ingredient to kill roaches
- Protect your home from roaches
- For a clean roach free home
- Rids your home of roaches
- Gets rid of roaches [in your home]
- Kills large roaches and Palmetto bugs
- Fast control with Fipronil

ACCEPTED
with COMMENTS
in EPA Letter Dated

FOR USE IN COMMERCIAL, INDUSTRIAL AND
RESIDENTIAL AREAS

ACTIVE INGREDIENT: Fipronil [5-Amino-
1-(2,6-dichloro-4-(trifluoromethyl)
phenyl)-4-(1,1,1-trifluoroethyl)
sulfonyl]-1H-pyrazole-3-carbonitrile]

INERT INGREDIENTS:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
64248-12

0.03%
99.97%

for carton only:

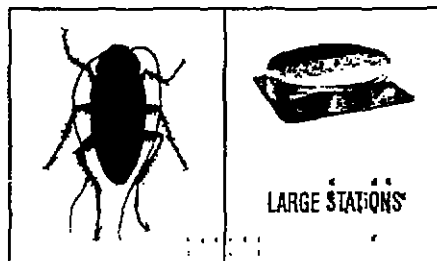
(The paperboard in this
carton contains) [is made
from] _____ % recycled fiber
(minimum
post-consumer content)



KEEP OUT OF REACH OF CHILDREN

CAUTION:

(See Precautions on Side -or- Back Panel.)



CONTAINS 48 CHILD RESISTANT BAIT STATIONS

TOTAL NET WT 2.96 oz (84 g.) -or- 4.65 oz (132 g.)
NET WT PER UNIT 0.06 oz (1.75 g.) -or- 0.1 oz (2.75 g.)

R-10125-7 (master)

MAXFORCE[®]

LARGE ROACH BAIT F.03

Fipronil kills insects by blocking the gaba regulated chlorine channel based on in-vitro binding data in rat brain preparations and insect electrophysiology studies.

This product contains Fipronil, [a [new] active ingredient] which kills roaches by ingestion or contact. In the process of ingestion or contact, Fipronil (the active ingredient) acts by blocking the GABA (Alpha Amino Butyric Acid) receptor chloride channel. Once chloride ions cannot pass through the channel, depolarization ensues resulting in continued release of excitatory transmitters and hyperexcitation of the neuron.

This product is specially designed for large cockroaches, such as American and Oriental roaches, as well as waterbugs and palmetto bugs. It may be used indoors and outdoors for the control of cockroaches in any structure where large cockroaches are a problem, such as residential, warehousing and commercial establishments, including food service, food manufacturing and food processing facilities, hospitals, schools, day care centers, nursing homes, health care facilities, laboratories, computer and electronic equipment facilities, pet shops, zoos, basements, buses, boats, trains, and aircraft.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

1. [Break bait stations away from the plastic frame and] Place in areas where large cockroaches have been seen and where they hide. Large cockroaches hide near or in floor drains and other exposed plumbing fixtures, near basement windows and doors, sewers, steam tunnels, and where food is prepared and stored. For outdoor use, place bait stations in areas adjacent to structures where roaches may rest or breed, for example on decks, stairs, and patios; around woodpiles, plants and trees; near vents, pipe chases, electrical conduits, windows, and other points of entry.
-or-
1. [Break bait stations away from the plastic frame and] Place in areas where cockroaches have been seen and where they hide. Cockroaches infest dark, warm, damp locations.
2. The stickers provided in the box -or- bag can be used to attach bait stations to vertical surfaces if desired.
-or-
2. The bait stations can be stuck to a vertical surface by peeling off the protective strip to expose adhesive.
3. For effective roach control use 2-3 bait stations per 100 square feet of horizontal surface area. Place adjacent to walls and flush in corners. For outdoor use, place stations adjacent to structure.
4. Do not spray the bait stations. Avoid placing the bait stations on freshly sprayed surfaces.
5. Roaches will begin eating the bait immediately and you should expect to see fewer roaches [with] in a week or less -or- 3 [3-7] days -or- 1 week.
6. Inspect all bait stations and replace as needed for continual control of roaches.

STORAGE AND DISPOSAL:

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

STORAGE: Store in a cool dry area out of reach of children.

DISPOSAL: Wrap bait stations in several layers of newspaper and discard in trash.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION

Wash thoroughly with soap and water after handling bait stations.

QUESTIONS? COMMENTS? CALL 1-800-426-5228.

U.S. Patent Nos. _____ and other patents pending.

Distributed by & © 1996 MAXFORCE Insect Control Systems
1221 Broadway, Oakland, CA 94612

QUESTIONS? COMMENTS? CALL 1-800-426-5228.

And, see the Maxforce website at www.maxforce.com.

EPA Reg. No. 64248-12 EPA Est. No. 5815-MS-011



R-10125-7 (master)

UNIT LABEL

MAXFORCE[®]

LARGE ROACH BAIT F.03

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label



ACTIVE INGREDIENT: Fipronil 0.03%

INERT INGREDIENTS: 99.97%

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

CAUTION:

Wash thoroughly with soap and water after handling.

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

DISPOSAL: Wrap used station in several layers of newspaper and discard in trash.

For Questions or comments about MAXFORCE, call toll free 1-800-426-6228

Distributed by & © 1996:
Maxforce Insect Control Systems
1221 Broadway
Oakland, CA 94612

EPA Reg. No. 64248-12
EPA Est. No. 5813-MS-01

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

Net Weight 0.06 oz (1.75 g.) -or- 0.1 oz (2.75 g.)

RU-10125-3 (master)