



064248-00014-051999

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Systems Integration Group, Inc.

United States Environmental Protection Agency

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

MAY 19 1999

Subject: Addition of Label Claims
EPA Registration Number: 64248-14
Submission Dated February 2, 1999

Dear Mr. Smith,

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

- The review of Maxforce's Efficacy Study Rebuttal is attached. The following efficacy claims should be removed from the label.
 "Kills roach eggs before they hatch."
 "Kills roaches and their eggs."
 "New egg-stopping ingredient -or- formula."
 "Inhibits egg production -or- hatching."
 "Inhibits roach reproduction."
 "Kills roaches and the eggs they carry 24 hours a day, 7 days a week."
 "Kills roaches and the eggs they carry while you sleep."
 "Patented egg kill action."
- Under the heading "For Outdoor Use:" delete the statement: "Place in areas adjacent to structures where roaches may rest or breed." This statement is not site(s) specific to prevent potential product misapplication.
- The term "New" remains optional text, and the 6 month allowable use for this term was discussed in the Agency's original Section 3 unconditional registration dated September 11, 1998. The Agency stated "The 'new' claim may be used only for six months after the date the product is released for shipment." This time contingent statement shall not be extended by Agency acceptance of this current label submission.

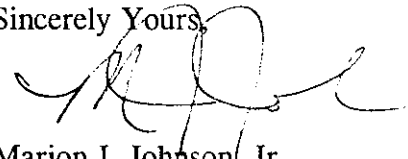
CONCURRENCES

SYMBOL ▶	H7505C	7505C						
SURNAME ▶	RGEBKEN	<i>M. J. Hol</i>						
DATE ▶	May 5, 1999	5/19/99						

- 4. The prophylactic claim "Use outdoors* to prevent roaches from coming indoors." is applicable only to certain species of roaches. This statement is not site and/or pests specific and may pose potential product misapplication.

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely Yours,



Marion J. Johnson, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division (7505C)

attachments

*Note: [Bracketed information is optional text.]
 Italicized text is information for reader and not part of the label.*

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Keep gel away from foods and food contact surfaces. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling.

FIRST AID:
IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.
IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

PHYSICAL AND CHEMICAL HAZARDS: Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

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

CONTAINER DISPOSAL: Wrap used pre-filled plastic dispenser[s] or reservoir[s] or syringe[s] in several layers of newspaper and discard in trash.

RBF5



CRACKS & CREVICES CLAIMS:

- For crack and crevice cockroach control
- Use in cracks and crevices
- Use in cracks and crevices against roaches

CONTINUOUS ACTION CLAIMS:

- Kills Roaches and Keeps on Killing
- Long lasting control

DUAL KILL CLAIMS:

- Dual -or- Double Killing action -or- formula
- Kills [cockroaches in 2 ways] by ingestion and contact
- Kills roaches through -or- by ingestion -or- contact
- Kills two ways

EGG KILL CLAIMS (SMALL ROACHES ONLY):

- Kills roach eggs before they hatch
- Kills roaches and their eggs
- New egg-stopping ingredient -or- formula
- Inhibits egg production -or- hatching
- Inhibits roach reproduction
- Kills -or- destroys the egg machine
- Kills roaches and the eggs they carry 24 hours a day, 7 days a week
- Kills roaches and the eggs they carry while you sleep
- Patented action egg kill

GUARANTEES:

- Guaranteed to kill roaches
- Guaranteed to work (or your money back)
- Satisfaction Guaranteed

IMPROVED FORMULA CLAIMS:

- Faster acting formula **
- Improved formula
- New generation roach control
- Patented [action] formula -or- ingredient

LARGE ROACHES ONLY CLAIMS:

- Effective on -or- kills large [American] roaches and Palmetto bugs
- Kills and -or- controls American roaches and Palmetto Bugs
- Starts killing large roaches in 1-2 days

NO MESS CLAIMS:

- Easy to use [apply]: nothing to activate
- No messy residue
- No vapor, fumes or odor

OTHER CONSUMER CLAIMS:

- Can be applied out of reach of children and pets
- Controls German roaches
- Designed -or- ideal for use in kitchens
- Easy to use [apply]
- Effectively kills without a trace -- no fumes or odor.
- For indoor and outdoor use* [cockroach control]
- Kills roaches resistant to other insecticides
- Kills roaches where you can't find them
- Kills roaches you don't see
- Kills roaches you see and [even] those you don't for complete protection
- Works inside and outside [the home*]

OTHER FORMULA CLAIMS:

- [New] Quick kill formula
- [New] Fast action formula
- Special Patented [action] formula -or- ingredient

PROPHYLACTIC CLAIMS:

- Use outdoors* to prevent roaches from coming indoors

SPEED OF KILL CLAIMS:

- Controls American roach infestations in 8 days
- Controls German roach infestations in 2 days
- [Delivers] fast killing results
- Fast acting ingredient
- Fast acting -or- action ingredient -or- formula
- Gain control of your large roach problem 2 times faster than before **
- Gain control of your small roach problem 4 times faster than before **
- Kills German roaches (2-10 times) faster than before **
- Kills roaches faster **
- Kills roaches quickly
- Kills quickly and keeps on killing
- Now works even faster -or- better on large roaches **
- Now works in 11-21 days on large roaches
- Overnight results -or- action -or- kill
- Roach control in 2 days (German)
- Roach control in 8 days (American)
- See results sooner **
- See visible results overnight
- Starts killing within a day
- Starts killing roaches in hours -or- overnight
- Starts killing [roaches] overnight and keeps on killing
- Starts working in hours

*adjacent to home -or- structure
 ** vs. 64248-5

ACCEPTED
 with COMMENTS
 In EPA Letter Dated:
 MAY 19 1999

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

64248-14

KEEP OUT OF REACH OF CHILDREN
CAUTION:

(See cautions on end -or- side -or- bottom panel)

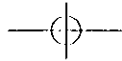
ACTIVE INGREDIENT: Fipronil [5-Amino-1-(2,6-Dichloro-4-(trifluoromethyl)phenyl)-4-(1R,S)-(trifluoromethyl)sulfinyl)-1H-pyrazole-3-carbonitrile] 0.01%
 OTHER INGREDIENTS: 99.99%

FOR USE IN COMMERCIAL, INDUSTRIAL AND RESIDENTIAL AREAS
 USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS.
 Avoid contact with textiles and clothing as bait may stain. -or- Product may stain textiles and clothing.
 Contains ___ pre-filled plastic dispenser[s] -or- reservoir[s] -or- syringe[s] -or- [roach] bait injector[s] for use with Specialty Products Gun™ -or- Maxforce Bait Injector

TOTAL NET WT _____



375



Note: [Bracketed information is optional text.]
 Italicized text is information for reader and not part of the label.

6428-14 Maxforce RBFS

RBFS



This product provides **FAST CONTROL** in 2 days (German roaches). This product contains Fipronil, a new faster-acting active ingredient that provides control of German roach populations in 2 days.

This product's **Dual Action** kills roaches two ways. This product contains Fipronil which kills roaches by ingestion and contact. During -or- After foraging roaches either eat or contact the bait, they return to the harborage and contaminate -or- kill other roaches.

This product kills roaches in their harborage. This gel product can be injected [applied] as a spot or as a crack and crevice application, near places where roaches harbor or enter a structure. This gel product [also] allows you to place bait in a wide variety of locations in and adjacent to structures, so that more roaches find and eat the bait, and die.

This product effectively controls large roaches. This product contains Fipronil, a new fast-acting active ingredient that kills American roaches faster than Hydramethylnon. This product controls large [American] roach populations in 8 days.

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 as a spot or crack and crevice treatment for the indoor and outdoor (adjacent to homes -or- structures) control of cockroaches in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments, including warehouses, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, schools, laboratories, computer facilities, sewers, "aircraft", buses, boats/ships, trains, pet shops and zoos. Non-food/non-feed areas are areas such as garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). This product may also be used in food areas of food/feed handling establishments as outlined below.

Applications in Food/Feed Handling Establishments: Application within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment only. Apply with MAXFORCE® Bait Injector -or- syringe applicator directly into cracks and crevices. Place applicator tip 1/2 inch into cracks, crevices, holes and other small openings where roaches may be a problem. Apply small amounts of gel (up to 1/2 gram) per spot. Do not apply bait to areas where food/feed, food utensils or food processing surfaces may become contaminated. Do not apply bait 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 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. Care should be taken to avoid depositing gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface.

Food/feed 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. Apply bait in small amounts between different elements of construction, between equipment and floors, openings leading into voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, behind and under refrigerators, cabinets, sinks, closets, stoves and other equipment where cockroaches hide. During follow-up visits inspect bait placements and reapply when necessary. Application of this product in food/feed areas of food/feed handling establishments other than as a crack and crevice treatment is not permitted.

Do not treat food preparation surfaces. Do not apply bait gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.

This product is packaged in a plastic reservoir containing 30g (1.05 oz.) [plastic dispenser containing 2.1 oz. (60g)] of bait. Application rate is dependent on level of infestation and species to be controlled. Bait can be applied as spots or as a bead in cracks and crevices. The lower application rate should be used for low to moderate infestations or re-treatments and the higher rate for more severe infestations or where the population occurs in inaccessible areas, such as in walls. Gel placements should be at or near harborages or aggregation areas, such as corners, areas of movement or cracks and crevices. Numerous smaller placements will provide faster control than fewer larger spots, especially for German cockroach control.

For outdoor use: Place in areas adjacent to structures where roaches may rest or breed. Apply bait to potential points of insect entry, such as eaves, sills, and expansion joints. Apply bait in protected areas whenever possible. Environmental stresses such as direct sunlight and water will reduce the residual effectiveness.

Priority treatment areas may be identified by visual inspection of such areas listed above or aided by trapping techniques or spot flushing.

Directions for loading reservoirs and operation:

1. With the teeth of the drive rod facing up, pull the drive rod all the way back. If the drive rod is initially hard to move, simply unscrew (turn counter-clockwise) the black portion of the applicator that holds the gel reservoir until the drive rod moves easily.

2. Attach a pre-filled reservoir of gel with a twist-locking motion. Remove the outlet cap and attach a dispensing tip.
3. Turn the knob of the drive rod so that the teeth are facing down and move it slightly forward so that the trigger mechanism will engage. Squeeze the trigger until the drive plunger seats against the piston in the gel reservoir. Gently squeeze the trigger until the gel flows out.
4. If gel continues to flow after the trigger is released, simply unscrew the portion of the bait applicator that holds the reservoir to a point where gel does not continue to flow after the trigger is released.

The bait will adhere to non greasy or non-dusty surfaces and will remain pliable and palatable to cockroaches as long as it is visibly present. Reapply when bait is no longer visibly present, according to the remaining level of infestation, which is generally at a lower rate than the initial treatment. A visual inspection of bait placement is recommended at one month after the initial treatment. Reapplication should occur if the bait is visibly depleted.

Directions for changing reservoirs: With the arrow on the drive rod pointing up, pull the drive rod out as far as it will go. Remove the empty reservoir, wrap, and place in trash can. Reservoirs that still contain gel can be sealed with the end cap and outlet cap for future use. To attach a new reservoir follow the above directions.

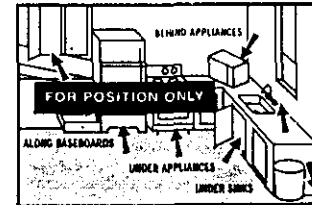
To apply gel: Remove the cap on the nozzle, touch the tip to surface, and depress the plunger. Recap the dispenser after treatment is completed. The bait will adhere to non greasy or non-dusty surfaces and will remain pliable and palatable to cockroaches as long as it is visibly present. Reapply when bait is no longer visibly present, according to the remaining level of infestation, which is generally at a lower rate than the initial treatment. A visual inspection of bait placements is recommended at one month after the initial treatment.

Pest population reduction will be apparent with 2 -or- 3 days for German roaches and 8 days for American roaches. Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

Break-lip Reservoir: Prior to use, break the snip-tip closed end of the gel reservoir at the scored line. After use, the reservoir may be rescaled with the enclosed black outlet cap. The black outlet cap is reusable.

SPECIES / LEVEL OF INFESTATION	APPLICATION RATE (PER SQ. YD.)
MODERATE INFESTATIONS OR [RE-TREATS] FOR SMALL SUCH AS GERMAN OR BROWN-BANDED ROACHES:	1 - 2 SPOTS ABOUT THE SIZE OF THE GEL SYRINGE [RESERVOIR] CAP OR 1 1/2" - 3" BEAD
SEVERE OR HEAVY INFESTATIONS FOR GERMAN OR BROWN-BANDED ROACHES:	2 - 4 SPOTS ABOUT THE SIZE OF THE GEL SYRINGE [RESERVOIR] CAP OR 3" - 6" BEAD
LARGE ROACHES SUCH AS AMERICAN, SMOKEY BROWN OR ORIENTAL:	(ACTUAL SIZE SYRINGE [RESERVOIR] CAP) RECOMMENDED SPOT SIZE (1/4" - 1/2" g)

Most Important Locations:



If you have questions regarding the use of this product, please call 1-800-843-6334. And, see the Maxforce website at www.maxforce.com

EPA Reg No. 64248-14
 EPA Est. No. 5813-MS-001

U.S. PATENT NOS. 4,163,102; 4,213,988; 4,191,768, 4,812,309

Mfd. for -or- Distributed by & © 1998
 Maxforce Insect Control Systems
 1221 Broadway, Oakland, CA 94612

R-10173-3

Handwritten numbers: 4, 5, 6, 7

Note: [bracketed information is optional text]
italicized text is information for reader and not part of the label

UNIT LABEL

RBF5



Note: Do not remove this label
Use only in areas not easily accessible to children and pets.



ACTIVE INGREDIENT: Fipronil 0.01%
OTHER INGREDIENTS: 99.99%

KEEP OUT OF REACH OF CHILDREN

CAUTION:

Keep gel away from foods and food contact surfaces. Harmful if absorbed through skin
Causes moderate eye irritation. Avoid contact with skin, eyes and clothing.
Wash thoroughly with soap and water after handling.

CONTAINER DISPOSAL: Wrap used pre-filled plastic dispenser[s] -or- reservoir[s] -or- syringe[s] in several layers of newspaper and discard in trash.

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

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Maxforce Insect Control Systems
1221 Broadway
Oakland, CA 94612

EPA Reg. No. 64248-14
EPA Est. No. 5813-MS-001

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

Net Weight _____
May stain textiles, fabrics and/or porous surfaces.

RU-10173-2

5
5
5