

MAR 13 2000

J. Evelyn Lawson
Maxforce Insect Control Systems
c/o PS&RC
P.O. Box 493
Pleasanton, CA 94566

Dear Ms. Lawson:

Subject: RBF5
EPA Reg. No. 64258-14
Submission dated 6/21/99

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.

The syringe must be calibrated so that an applicator can determine that the amount of the gel bait placed in the refillable bait station complies with the label.

All units of measure must be in U.S. units. Metric measures may supplement U.S. units of measure.

All "dual" or "double" kill claims must clarify that the "dual" or "double" refers to ingestion and contact.

All claims that the product may be used in kitchens must clarify that this is a crack and crevice use only, and the gel is not to be used on surfaces including surfaces where food is handled or prepared.

~~Revise the section prohibiting use on hot surfaces. Application outside of a bait station is limited to crack and crevice, and reference to surface application is contrary to other label instructions.~~

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

All references to outdoor use must clearly state that such use is adjacent to the home or structure. This clarification may not be relegated to a footnote.

All references to large roaches must state what a large roach is.

Delete the claim "improved formula". This is a comparative claim.

Add the following to the directions for use:

Position refillable bait stations outdoors adjacent to the home (or structure) so that they will not come in contact with lawn equipment.

The directions for application of the roach gel must reference the table.

Add to the directions for use in food handling establishments the following:

If gel contacts an exposed surface where food is handled, remove gel and wash exposed surface with an effective cleaning compound followed by a potable water rinse prior to use.

The reference to hydramethylnon is a comparative claim. You must delete this claim or limit it to Maxforce hydramethylnon products.

In the unit label delete the statement "Use only in areas not easily accessible to children and pets." Add the following statement: "Keep out of reach of children and pets."

In the product identification sticker label delete the statement "Do not allow children to play the station or contents." Add the following statement: "Keep out of reach of children and pets."

Add to the product identification sticker a disposal statement: "Securely wrap used bait station in several layers of newspaper and dispose of in trash."

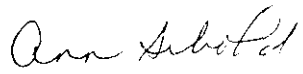
This product is not required to be in child resistant packaging provided the following conditions are met:

The amount of fipronil per station does not exceed 0.5 mg.

The amount of fipronil per package of syringes is less than 28.5 mg.

Copies of the child resistant packaging review and the worker exposure review are attached. If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



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

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.

R B F 5



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

GUARANTEES:

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

IMPROVED FORMULA CLAIMS:

- Faster acting formula **
- Improved formula
- 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*)
- Kills -or- destroys the egg machine

OTHER FORMULA CLAIMS:

- Quick kill formula
- Fast action formula
- Special Patented (action) formula -or- ingredient

PROPHYLACTIC CLAIMS:

- Use outdoors * to prevent large 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 [1-2] 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

*in cracks or crevices adjacent to home -or- structure
** vs. 64248-5

KEEP OUT OF REACH OF CHILDREN

CAUTION:

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

ACTIVE INGREDIENT: Fipionil [5-Amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-(1,R,S)-(trifluoromethyl)sulfinyl]-1H-pyrazole-3-carbonitrile]0.01%

OTHER INGREDIENTS:99.99%

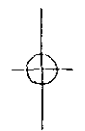


FOR USE IN COMMERCIAL, INDUSTRIAL AND RESIDENTIAL AREAS
 USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS.
 Avoid contact with textiles and clothing as bait may stain. -or- Product may stain textiles and clothing.
 Contains ___ pre-filled plastic dispenser[s] -or- reservoir[s] -or- syringe[s]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

TOTAL NET WT _____

MAR 13 2000

64248-14



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RBF5



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

Dual Action kills roaches two ways. 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.

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 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.

GENERAL DIRECTIONS:
For roach gel: Application rate is dependent on level of infestation and species to be controlled. Bait can be applied as a spot 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.

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.

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.

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 cracks or crevices adjacent to structures where large 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.

GEL BAIT:
Refillable stations: This product may be used in the Maxforce Refillable Bait Station or B&G Perimeter Patrol Station. Place 0.5 to 5 grams of product per station. Refillable stations should be placed every 20 to 30 feet around the perimeter of a structure. Use approximately 2 stations per side of a typical single family home.

For best results, place stations near air conditioning units, water faucets, foundation vents and weep holes, decks' utility entryways

(e.g. electrical cable TV) and wherever target pests are frequently found. Stations may also be placed along fence lines and property lines to intercept foraging pests.

Regularly inspect all stations and replace bait as needed for continual control.

If the station is not equipped with a sticker to identify the contents, apply a sticker (supplied) to the outside of the station.

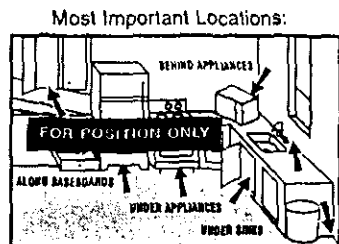
- Directions for loading reservoirs and operation:**
1. With the teeth of the drive rod facing up, pull the drive rod all the way back. If the drive rod is initially hard to move, simply unscrew (turn counter-clockwise) the black portion of the applicator that holds the gel reservoir until the drive 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. **Break-tip Reservoir:** Prior to use, break the snip-tip closed end of the gel reservoir at the scored line. After use, the reservoir may be resealed with the enclosed black outlet cap. The black outlet cap is reusable.
 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.

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.

For syringe
To apply gel: Remove the cap on the nozzle, touch the tip to surface, and depress the plunger. The bait will adhere to non-greasy or non-dusty surfaces and will remain 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.

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.

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: LARGE ROACHES, SUCH AS AMERICAN, SMOKEY-BROWN OR ORIENTAL:	2 - 4 SPOTS ABOUT THE SIZE OF THE GEL SYRINGE [RESERVOIR] CAP OR 3" - 6" BEAD <small>ILLUS. T.C.</small> (ACTUAL SIZE SYRINGE [RESERVOIR] CAP) RECOMMENDED SPOT SIZE (1/4 - 1/2 g)

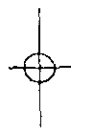


If you have questions regarding the use of this product, please call 1-800-843-6334. And, see the Maxforce website at www.maxforce.com

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

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Maxforce Insect Control Systems
1221 Broadway, Oakland, CA 94612
R-10173-4



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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

Mfd. for -or- Distributed by & © 1998:
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



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Note: (bracketed information is optional text.) Underlined text is new.
Italicized text is information for reader and not part of the label.

6428-14 Maxforce RBF5

PRODUCT IDENTIFICATION STICKER

RBF5



CAUTION: Do Not Allow Children to Play With

Station or Contents

Active Ingredient: Fluorinil0.01%

OTHER INGREDIENTS:99.99%

See product label for complete Precautions

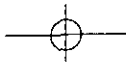
Maxforce Insect Control Systems

1221 Brophorn, Oakland, CA 94612

EPA Reg. No. 64248-14

For product information, Call 1-800-426-6228

Date Placed _____



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