

NOV 11 2000

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

Dear Ms. Christopher:

Subject: RBF5
 EPA Reg. No. 64248-14
 Submission dated 10/12/2000

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. If you have questions, please call me at (703) 305 6788.

1. The amount of gel to be applied must be clarified. For example, the general directions refer the user to Table 1. However, the directions for use in food/feed handling establishments provide different measures and make no reference to Table 1. In another example, the last measurement in table 1 refers to a spot size ranging from 1/4" to 1/2 g. Finally, the outdoor use section has no dose directions at all.
2. Delete all references to weight (grams), and use volume measures (teaspoons or fractions of teaspoons, or the equivalent thereof stated as size of spots). The application device does not weigh out the amount of gel to be applied.
3. Add to the Directions for Loading Reservoirs and Operation, item #4, a statement that directs the PCO not to exceed one teaspoon (or appropriately sized spot) of gel in the refillable bait stations.

4. The "Physical and Chemical Hazards" section should be duplicated on the syringe or reservoir (unit) label to advise the applicator of a potential shock hazard.

| | | | | | | | |
|---------|--|--|--|--|--|--|--|
| SYMBOL | | | | | | | |
| SURNAME | | | | | | | |
| DATE | | | | | | | |

5. For a period of 6 months, the Agency will allow the statement "...apply a sticker to the outside or inside of the station." During this 6 month period, Clorox has committed to evaluate the advantages and disadvantages of the alternate sticker placement locations and to present its conclusions to the Agency. The Agency will then make a final determination about the appropriate sticker placement.

6. The Agency acknowledges receipt of the instructions accompanying the Maxforce refillable bait station. These instructions address the installation, assembly and locking of this bait station. Although the Agency agrees that these instructions are not part of the pesticide label language, the pesticide label language as described in item number 5 shall be duplicated in the instruction sheet. A copy of the modified instructions shall be included in the Agency's regulatory files for this registration. If the installation instructions are later modified, the modified instructions should be submitted to the Agency.

7. The unit label contains two statements: "Keep out of reach of children and pets" and "Keep out of reach of children." You may delete the second.

8. Upon Clorox's next amendment, the Directions for Use section shall be modified to clearly delineate all Indoor Uses and all Outdoor (adjacent to the home or structure) Uses. For example, the applications in Food/feed Handling Establishments should be a subsection of the Indoor Use section, and the use of refillable stations should be a subsection of the Outdoor Use section.

9. In the Maxforce refillable bait station, the volume available to be filled (the removable cup) greatly exceeds the maximum dose of fipronil. Clorox has agreed to investigate ways to increase the likelihood that PCOs comply with the label maximum dose.

Sincerely,



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

Note: Bracketed information is optional text. Underlined text is new. 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:

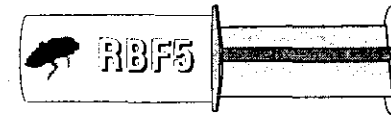
Do not contaminate water, food or feed by storage or disposal.

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.

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- formula¹
- Kills [cockroaches in 2 ways] by ingestion and contact
- Kills roaches through -or- by ingestion -or- contact
- Kills two ways²

GUARANTEES:

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

FORMULA CLAIMS:

- Faster acting formula³
- Patented [action] formula -or- ingredient

LARGE ROACHES' ONLY CLAIMS:

- Effective on -or- kills large [American] roaches⁴ and Paimetto bugs
- Kills and -or- controls American roaches and Palmetto Bugs
- Starts killing large roaches⁴ 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 kitchens⁵
- Easy to use [apply]
- Effectively kills without a trace - - no fumes or odor
- For indoor and outdoor (adjacent to home -or- structure) use⁶ [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 (adjacent to home -or- structure)
- Kills -or- destroys the egg machine

OTHER FORMULA CLAIMS:

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

PROPHYLACTIC CLAIMS:

- Use outdoors⁷ to prevent large roaches⁸ 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 roach⁹ problem 2 times faster than before¹⁰
- Gain control of your small roach problem 4 times faster than before¹¹
- Kills German roaches (2-10 times) faster than before¹²
- Kills roaches faster¹³
- Kills roaches quickly
- Kills quickly and keeps on killing
- Now works even faster -or- better on large roaches¹⁴
- Now works in [1-2] days on large roaches¹⁵

- Overnight results -or- action -or- kill
- Roach control in 2 days (German)
- Roach control in 8 days (American)
- See results sooner¹⁶
- 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

ingestion -or- contact
 vs. MAXFORCE Hydramethylnon product
¹ American, Oriental, Brown, Smokey Brown
² not to be used on surfaces where food is handled or prepared
³ in cracks or crevices adjacent to home -or- structure

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-(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 _____

R0173-7

ACCEPTED
 with COMMENTS
 In EPA Letter Dated:
 NOV 11 2000
 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 64248-14

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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.

R B F 5



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 roaches¹. This product contains Fipronil, a fast-acting active ingredient that kills American roaches. This product controls large [American] roach¹ 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 spots or as a bead in cracks and crevices (refer to Table 1). 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. 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. 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 0.5 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 cracks and crevices where the temperature exceeds 130°F as bait may run.¹ Examples include, but are not limited to, portions of stoves, ovens, grills, lume 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 (adjacent to home -or- structure): Place in cracks or crevices adjacent to structures where large roaches¹ 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.

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. Do not exceed 5 grams per station (or up to 1 tsp). 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.

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

Position Refillable Bait Stations (adjacent to home -or- structure) in areas where they will not be damaged by lawn equipment such as mowers and trimmers. When placing the station in turf remove sod layer and place station base plate against the soil.

If the station is not equipped with a sticker to identify the contents, apply a sticker to the outside 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 snap-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.

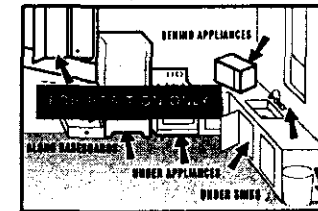
-or-
For syringe
To apply gel: Remove the cap on the nozzle, touch the tip to surface, and depress the plunger. The bait will adhere to non-greasy or non-dusty surfaces and will remain pliable and palatable to cockroaches as long as it is visibly present. Reapply when bait is no longer visibly present, 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.

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.

Table 1

| 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 ^{KL205} ^{TK} |
| 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:



¹ American, Oriental, Brown, Smokey Brown
² not to be used on surfaces where food is handled or prepared

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

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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.

UNIT LABEL

RBF5



Note: Do not remove this label
KEEP OUT OF REACH OF 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: Securely 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.

R0173-7

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BAIT STATION STICKER

The artwork shown below is 130% of actual size.

CAUTION: CONTAINS PESTICIDES.
DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THIS STATION OR ITS CONTENTS AVOID EYE AND SKIN CONTACT.

This station contains the following Maxforce® products:

- A** Maxforce® Professional Insect Control Ant Killer/Granular Bait
Active Ingredient: Hydramethylinon (1.0%), EPA Reg. No. 64248-6
- B** Maxforce® IBH10
Active Ingredient: Hydramethylinon (1.0%), EPA Reg. No. 64248-19
- C** Maxforce® Professional Insect Control Roach Killer Bait Gel
Active Ingredient: Hydramethylinon (2.15%), EPA Reg. No. 64248-5
- D** RBF5
Active Ingredient: Fipronil (0.01%), EPA Reg. No. 64248-14

For more information call 1-800-426-6228.
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|---------------------|--|--|--|
| Serviced By | | | |
| Date | | | |
| Product Code Letter | | | |

PEEL HERE

R0173-7