

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

16 NOV 1993

300/5445864
18/3

FILE COPY

Mr. Michael Flaherty
Lo Tox Products International
200 South 14th Avenue
Mt. Vernon, NY 10550


Dear Mr. Flaherty:

Subject: Minor Label Revision - Precautionary Text
It Works Roach Killing Stations
EPA Registration Number 65445-1
Amended Application Dated July 20, 1993
It Works Roach Killing Paste
EPA Registration Number 65445-2
Amended Applications Dated July 20 and August 11, 1993

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 comment listed below. Three copies of the final printed label must be submitted prior to releasing the product for shipment. A stamped copy is enclosed for your records.

Regarding product 65445-1: The regulations put forth in 40 CFR Part 156.10(a)(5)(ii) and (iv), *False or misleading statements*, that label claims such as "...kill faster..", "...kill faster than other bait stations...", and "...provides longer lasting control...." are not acceptable. Revise these label statements to delete the effectiveness comparison claims, and resubmit the labeling to the Agency for review.

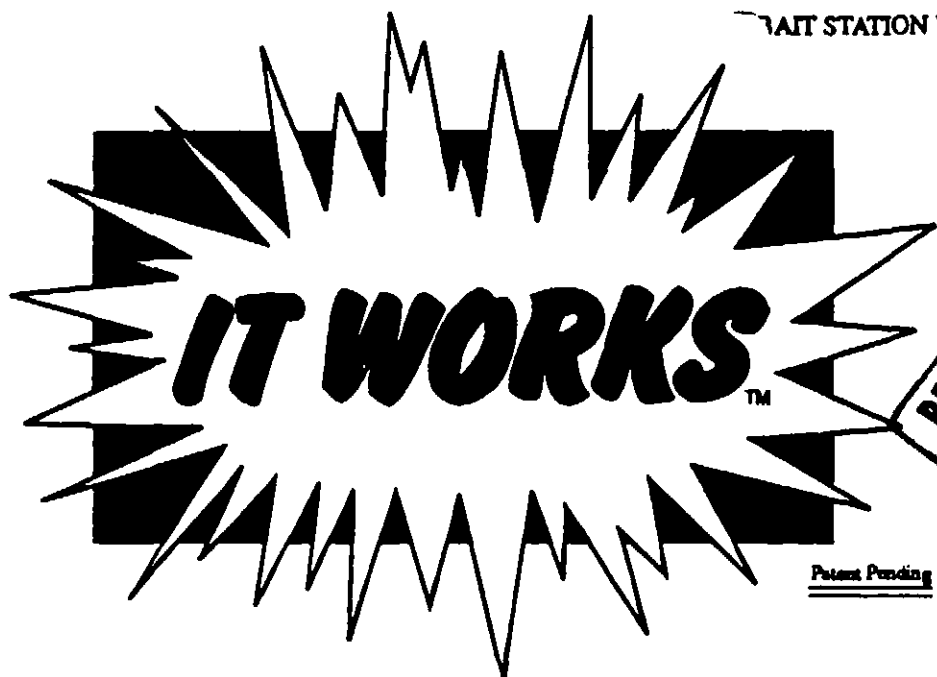
Sincerely,



Mr. Adam Heyward
Acting Product Manager 10
Insecticide-Rodenticide Branch

CONCURRENCES
Registration Division

SYMBOL							
SURNAME							
DATE							



BEST AVAILABLE COPY



ROACH KILLING STATIONS

IT WORKS™ roach killing stations unique bait starts to attract roaches in the presence of other foods. Roaches crawl away to die.

IT WORKS™ kill faster than other baits and provide longer lasting control of roaches than other roach killing stations. **IT WORKS™** roach killing stations kill roaches for 4 full months.

DIRECTIONS FOR USE

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

For effective roach control, place stations at once.

- 1 - Open pouch, remove IT WORKS roach killing stations and break apart from plastic frame.
- 2 - Place all 12 roach killing stations in areas where roaches have been seen.
- 3 - IT WORKS begins attracting roaches. Roaches eat the bait, crawl away and die.
- 4 - Replace all roach killing stations for continued protection from roaches.

IT WORKS™ roach killing stations are safe for use in nursing homes, hospitals, restaurants, offices and office buildings, stores, food preparation establishments, bakeries, barracks and military installations, schools, boats and ships. Can be placed where roaches are seen.

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION

Harmful if swallowed

STATEMENT OF PRACTICE

IF BAIT IS SWALLOWED: Call Poison Control Center or Physician. Drink 1 or 2 glasses of water and touch the back of the throat. Do not induce vomiting or anything by mouth to an unconscious person.

STORAGE AND DISPOSAL

Storage: Store in a dry place. Do not store in areas where children may gain access.

Disposal: Wrap container and place in trash.

ROACH KILLING STATIONS

**KILLS ROACHES FOR 4 FULL MONTHS
24 HOURS A DAY**

**Can be placed wherever roaches are seen
Kills roaches, ants and silverfish
No Mess • No Odor**

Patent Pending

ACCEPTED with COMMENTS in EPA Letter Dated

16 NOV 1993

ACTIVE INGREDIENT: Boric Acid 52.00%
INERT INGREDIENTS : 48.00%

CAUTION

**KEEP OUT OF REACH OF CHILDREN
See directions and cautions on back**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 65445-1

Contains 12 Child Resistant Bait Stations

NET WEIGHT : 1.5 OZ.

EPA Reg. No. 65445-1 EPA Est. No. 65445 - CT-01

**Lo Tox Products International Inc.
200 South 14 Avenue, Mt. Vernon, NY 10550**

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