

Reg # 65445-2

PM-10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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300/545/872  
17/4

30 NOV 1993

FILE COPY

Mr. Andrew A. Chase  
Lo Tox Products International Incorporated  
200 South 14th Avenue  
Mt. Vernon, New York 10550

Dear Mr. Chase:

Subject: Alternate Method of Application/Packaging  
It Works Roach Killing Paste  
EPA Registration Number 65445-2  
Amended Application Dated October 18, 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 comments listed below. Three (3) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the product label is enclosed for your records.

1. Delete the heading **DIRECTION FOR USE IN LARGER SPACES**, and substitute the heading and subheadings listed below, followed by the appropriate text:

**DIRECTIONS FOR USE**

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

**In Larger Spaces:** To control cockroaches, .....(etc.)

**In New Construction:** When treating large areas....(etc.)

**If Using BaitGun or Other Dispensing Systems to Control cockroaches, ants, and silverfish:** (etc.)

2. It is not necessary to place the statement "It is a violation of Federal law...." more than one time within the label text. Delete this second statement which appears as the first sentence in the second column of text on the proposed label.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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3. Revise the PRECAUTIONARY STATEMENTS section to appear as follows:

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans and Domestic Animals**  
**CAUTION**

Harmful if swallowed. May cause eye irritation. Avoid eye contact. Wash thoroughly after handling.

4. Add the following statement to the STORAGE AND DISPOSAL section: Do not contaminate water, food or feed by storage or disposal.

Sincerely,



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

**CONCURRENCES**

<b>SYMBOL</b>								
<b>SURNAME</b>								
<b>DATE</b>								

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**BEST AVAILABLE COPY**

**DIRECTION FOR USE IN LARGER SPACES**

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

← revise X

To control cockroaches, ants and silverfish, apply the paste liberally. **DO NOT SPREAD.** Apply the paste under and behind refrigerators and stoves; into openings around drains, water pipes and electrical conduits; in cracks and crevices along baseboards and in corners of cabinets, cupboard and closets. Remove all lower drawers in the kitchen and bathroom cabinets, bedroom dressers and chest drawers, then apply the paste liberally in the drawer walls.

**Direction for Applying in New Construction**

When treating large areas such as wall voids, soffit and subcabinet void in new and existing construction, apply the paste liberally. **DO NOT SPREAD.**

Reapply the paste as necessary. Any paste visible after application must be scraped into cracks and crevices or removed. Apply only in areas inaccessible to children and pets. Avoid contamination of feed and foodstuffs.

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

**IT WORKS ROACH KILLING PASTE** may be used as a bead for crack and crevice treatment or as "spots" for a bait placement applications.

Directions for use with **BaitGun®** and other dispensing systems to control cockroaches, ants and silverfish.

1. Fully retract the drive rod as far back as possible.
2. Attach a prefilled cartridge of **IT WORKS Roach Killing Paste** using a twisting and locking movement.
3. Remove the reservoir outlet cap and attach the dispensing tip (supplied).
4. Push the drive rod forward until contact is made with the piston inside the prefilled cartridge. Turn the drive rod until the teeth are facing down engaging the trigger mechanism (arrow on end of rod should be facing down).
5. Gently squeeze the trigger to dispense **IT WORKS Roach Killing Paste** to the desired area.

Apply only in areas inaccessible to children and pets. Avoid contamination of food. For exposed areas use in conjunction with **IT WORKS Roach Killing Bait Station**.

- Recommended size of placement, (adjust according to infestation)
- It is suggested that product be placed within 6-12 inches of infested area (space accordingly).



**ROACH KILLING**  
**BaitGun**

Use as a spot or crack  
**KILLS ROACHES, ANTS**  
**24 HOURS**

**CAUTION**

**KEEP OUT OF REACH OF CHILDREN**  
See directions and label for use.

**ACTIVE INGREDIENTS**  
**INERT INGREDIENTS**

EPA Reg. No. 65445-2

**NET WEIGHT**

Contains ten prefilled cartridges  
**Lo Tox Product**  
200 South 14 Avenue

**IT WORKS PASTE TUB • US version 62, Bit Gun Formula**

**BEST AVAILABLE COPY**



**ROACH KILLING PASTE**  
BaitGun® Formula

Use as a spot or crack and crevice treatment  
**KILLS ROACHES, ANTS AND SILVERFISH**  
24 HOURS A DAY

**CAUTION**

**KEEP OUT OF REACH OF CHILDREN**  
See directions and cautions on side panel

ACTIVE INGREDIENT: Beric Acid 82.00%  
INERT INGREDIENTS : 48.00%

EPA Reg. No. 65445-2 • EPA Est. No. 65445 - CT-01

**NET WEIGHT : 13 oz.**

Contains ten prefilled roach killing paste cartridges  
Lo Tox Products International Inc.  
200 South 14 Avenue , Mt. Vernon, NY 10550

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

30 NOV 1993

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

65445-2

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

IT WORKS ROACH KILLING PASTE may be used as a bead for crack and crevice treatment or as "spots" for a bait placement applications.

Directions for use with BaitGun® and other dispensing systems to control cockroaches, ants and silverfish.

- 1• Fully retract the drive rod as far back as possible.
  - 2• Attach a prefilled cartridge of It Works Roach Killing Paste using a twisting and locking movement.
  - 3• Remove the reservoir outlet cap and attach the dispensing tip (supplied).
  - 4• Push the drive rod forward until contact is made with the piston inside the prefilled cartridge. Turn the drive rod until the teeth are facing down engaging the trigger mechanism (arrow on end of rod should be facing down).
  - 5• Gently squeeze the trigger to dispense IT WORKS Roach Killing Paste to the desired area.
- Apply only in areas inaccessible to children and pets. Avoid contamination of food. For exposed area's use in conjunction with IT WORKS Roach Killing Bait Station.

- Recommended size of placement, (adjust according to infestation)
- It is suggested that product be placed within 6 - 12 inches of infested area (space accordingly).

IT WORKS PASTE TUB• US version 62, Bit Gun Formula

IT WORKS ROACH KILLING PASTE is ideally suited for area's such as a long cabinets and base boards, in openings around pipes and other hard to reach places. This product may be used in homes, restaurants, markets, schools, warehouses, factories, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, industrial plants, theaters, ships, boats, trains, truck, yachts, camps, mobile homes, bases, zoos, kennels, military bases, libraries, utilities and sewers

**PRECAUTIONARY STATEMENTS**  
Hazard to Humans and Domestic Animals

**CAUTION**  
Harmful if swallowed

Wash thoroughly after handling

**STATEMENT OF PRACTICAL TREATMENT**

IF SWALLOWED: Drink two glasses of water and induce vomiting by inserting finger in back of throat. Do not induce vomiting or give anything by mouth to an unconscious person. Contact a physician. If eye contact, flush eyes with plenty of water. If skin contact wash with water. Get medical attention if irritation persists.

**STORAGE AND DISPOSAL**  
Do not reuse empty container. Wrap container and place it in trash collection.

*in several layers of news paper*

H6h

← revise X

Apply the paste penings limits; in rooms of a lower bedroom liberally

fit and apply

le after vices or children stuffs.