

31 MAR 1994

Mr. Lawrence Washburn
WACO Chemical Manufacturing Company, Incorporated
P.O. Box 588/Hwy. 421 South
Hyden, KY 41749

Dear Mr. Washburn:

Subject: 1.25 Ounce Container Size; Reformulation
Alpha 3 Roach Bait
EPA Registration Number 65700-1
Submissions Dated December 10, 1993; January 15, 1994

The amendments referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable subject to the comments listed below. One (1) copy 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. Due to the limited size of the 1.25 oz. container, the labeling as submitted which will be directly attached to the tube is acceptable provided that the complete label as provided in the December 10, 1993 submission is attached to the outer container which will hold the 12-1.25 oz. units. Revise the inner labeling statement **FOR ADDITIONAL DIRECTIONS FOR USE, REFER TO CARTON**, to read as follows: **FOR ADDITIONAL PRECAUTIONS AND DIRECTIONS FOR USE, REFER TO CARTON**.

2. Revise the statement **HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS** to read as follows: **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**.

3. Revise the active ingredient declaration "Boric ACID" to read "Boric Acid".

4. Revise the statement **APPLICATION OF THIS PRODUCT IN THE FOOD AND FEED AREAS OF FOOD HANDLING ESTABLISHMENTS ARE NOT PERMITTED** to read as follows: **APPLICATION OF THIS PRODUCT IN THE FOOD AND FEED AREAS OF FOOD HANDLING ESTABLISHMENTS, OTHER THAN AS A CRACK AND CREVICE TREATMENT, IS NOT PERMITTED**.

5. The **PESTICIDE DISPOSAL** and **CONTAINER DISPOSAL** sections of the **STORAGE AND DISPOSAL** portion of the product label are not appropriate for a 1.25 ounce container. You may delete the **PESTICIDE DISPOSAL** text, and revise the **CONTAINER DISPOSAL** section as follows:

DISPOSAL: Wrap tube in several layers of newspaper and discard in trash.

6. Regarding the basic formula revision:

BEST AVAILABLE COPY

a. The "% by Weight" (column 13b) of the ingredient flour was calculated to be 26.1% rather than 28.4%. Verify this calculation, and revise CSF accordingly.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

294

b. The "% by Weight" of the compound Onion powder was calculated to be 1.3% rather than 1.0%. Verify this calculation, and revise CSF accordingly.

c. The Lower Certified Limit (column 14b) for the ingredient onion powder is higher than the "% by weight". Correct this discrepancy and revise the CSF accordingly.

d. Revise the upper and lower certified limits (columns 14a and 14b) as outlined in 40 CFR 158.175 (see the Table of standard certified limits) for each of the formulation ingredients, and the limits provided on the CSF dated January 15, 1994, must be more specific (i.e. the limits currently provided on the CSF are too broad in scope).

e. Verify that the bulk density value of 8.4 pounds/gallon (box 7) is accurate given that vegetable oil was substituted for whole milk, and onion powder was substituted for onions.

f. note that the pH of this product (Box 8) is not applicable since this formula is not water-based.

Revise the label and the Confidential Statement of Formula as outlined above and resubmit these documents to the Agency for the record.

Sincerely,

Mr. Robert S. Brennis
Acting Product Manager 10
Insecticide-Rodenticide Branch
Registration Division

BEST AVAILABLE COPY

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

394

Specimen Label

Alpha³ Roach Bait

CAUTION KEEP OUT OF REACH OF CHILDREN
See side or back panel for additional cautions.

STATEMENT OF PRACTICAL TREATMENT

Immediately contact Physician or Poison control Center if swallowed. If eye contact occurs, flush eyes with plenty of water, get medical attention if irritation persists.

Manufactured by: **WACO Chemical Mfg. Co., Inc.**

P.O. Box 588, Hwy. 421 South, Hyden, KY 41749

Phone: (606) 672-3880

Contact Person: **Lawrence Washburn**

WACO Chemical Mfg. Co., Inc.

P.O. Box 588, Hwy 421 South, Hyden, KY 41749

Phone: (606) 672-3880

**NET
CONTENTS
1 OZ.**

EPA Registration No. 65700-1 EPA Est. No. 65700-KY-001

Active Ingredients: Boric ACID 33.3%

Inert Ingredients 66.7%

TOTAL 100%

PRECAUTIONARY STATEMENTS HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS CAUTION

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

DIRECTIONS FOR USE

THIS PRODUCT IS INTENDED FOR USE IN THE BaitGun® OR SIMILAR APPLICATION DEVICE. It is a violation of federal law to use this product in a manner inconsistent with its labeling. For control: Use the BaitGun® or similar application device to apply the bait liberally under refrigerators, stove, sinks, dishwashers, washing machines and dryers, tubs, and into drains, sewers, manholes, water pipes and electrical conduits; in cracks and crevices and in the seams of cabinets, cupboards and closets. Remove all lower and upper drawers and bathroom cabinets and other furnishings such as dressers and coffee tables, then apply amounts into those areas of such furnishings that provide harborage, such as furnace heaters and smoke detectors should be treated by placing bait into the cracks and crevices in such areas.

Application of bait should be performed as deemed necessary to continue desired level of baiting material that is overly visible after application should be scraped into cracks and removed. Apply this product in areas that are inaccessible to children and pets. Avoid application to feed and foodstuffs.

DIRECTIONS FOR APPLYING BAIT IN NEW CONSTRUCTION TO CONTROL COCKROACHES

When treating large areas, such as wall voids, soffit and cabinet voids and areas around in new and existing construction, apply bait liberally into cracks and crevices. This product may be used in homes, restaurants, and other food and feed handling establishments, warehouses, factories, offices, schools, motels, hotels, nursing homes, hospitals, grocery stores, apartment buildings, new constructions, theaters, ships, airplanes, industrial plants, motels, kennels, military bases, libraries and utilities.

BaitGun® is a registered Trade Mark of Speciality Products.

CRACK AND CREVICE TREATMENT

FOOD AND FEED HANDLING ESTABLISHMENTS: Places other than private residences where food or feed is held, processed, prepared or served.

FOOD AREA APPLICATION LIMITED TO CRACK AND CREVICE TREATMENT ONLY: receiving, storing, packing, (canning, wrapping, boxing) preparing, edible waste storage, processing systems such as mills, dairies, bakeries, restaurants or anywhere food or feed is prepared or served. Serving areas (when food is exposed and facility is in operation) also within a food area.

Apply bait in small amounts directly into cracks and crevices using suitable equipment capable of applying bait directly into cracks and crevices, in points between different elements of construction, between floors, openings leading to void and hollow spaces in walls, equipment legs and bases, conduits, and other areas where cockroaches hide.

Care should be taken to avoid depositing the bait onto exposed food and feed processing surfaces to avoid contamination.

APPLICATION OF THIS PRODUCT IN THE FOOD AND FEED AREAS OF FOOD HANDLING ESTABLISHMENTS, OTHER THAN A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED IN SERVING AREAS - Facilities where prepared foods are served, such as dining rooms, but excluding areas where food may be prepared or held. Apply bait as a spot treatment to selective surfaces such as elements of construction into cracks and crevices. Avoid treating surfaces likely to be contacted by food (not apply when facility is in operation or foods are exposed.)

NON-FOOD AREAS: Include garbage rooms, lavatories, offices, locker rooms, machine rooms, garages, mop closets, and storage (after canning or bottling). Apply to baseboards areas, and surfaces behind and beneath sinks, lockers, tables, pallets, and similar areas where insects hide or they may enter.

STORAGE AND DISPOSAL

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

STORAGE: Store in a dry place. Do not store where children or animals may gain access.

PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at a waste disposal facility.

CONTAINER DISPOSAL: Do not reuse empty reservoirs. Securely wrap in newspaper and

Specimen Label

occurs, flush eyes with plenty of water, get medical attention if irritation persists.
Manufactured by: **WACO Chemical Mfg. Co., Inc.**
P.O. Box 588, Hwy. 421 South, Hyden, KY 41749, Phone: (606) 672-3880
Contact Person: **Lawrence Washburn**
WACO Chemical Mfg. Co., Inc.
P.O. Box 588, Hwy. 421 South, Hyden, KY 41749, Phone: (606) 672-3880
EPA Registration No. 65700-1 EPA Est. No. 65700-KY-001
Active Ingredients: Boric ACID.....33.3%
Inert Ingredients.....66.7%
TOTAL.....100%

NET CONTENTS
1.25 OZ.

ACCEPTED
with COMMENTS
in EPA Letter Dated

31 MAR 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, this product is
registered under EPA

65700-1

BEST AVAILABLE COPY