

07 DEC 1993

Eco Fresh Industries
c/o Mr. John W. Kennedy
John W. Kennedy Consultants, Incorporated
9101 Cherry Lane, Suite 113
Laurel, MD 20708-1133

Dear Mr. Kennedy:

Subject: Review of Efficacy Data to Support Product Rate Reduction
Eco-Fresh® Treatment for Fleas
EPA Registration Number 66480-1
Eco-Fresh® No Fleas
EPA Registration Number 66480-2
Submission Dated June 28, 1993; July 29, 1983

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 products for shipment. A stamped copy of each product label is enclosed for your records.

1. Regarding product 66480-1: the data presented in MRID Numbers 428635-01 and 428635-02 are adequate to demonstrate the ability of this product to control the emergence of adult cat fleas, *Ctenocephalides felis* from carpet and upholstery treated with from 15 to 20 mg product per square inch applied according to label directions, and thus support a reduced label rate of 15.75 mg per square inch in areas other than those frequented by pests, and 31.5 mg per square inch in pet resting and sleeping areas. The label claim "Once a year flea control" is inappropriate since neither test was carried out for more than 4 weeks.

2. Regarding product 66480-2: the data presented in MRID Number 428634-01 are adequate to support the claim for prevention of emergence of adult cat fleas *Ctenocephalides felis* from carpet and upholstery treated with a solution of 12 ounces of powder per gallon of warm water applied according to the label directions to an area of 165-200 square feet. This data is also adequate to support the claim for reduction of flea emergence when applied as a powder at 8 ounces per 165-200 square feet (7.87-9.54 mg product per square inch). Again, the claim "Once a year flea control" is not appropriate since the test was not carried out for more than 4 weeks.

Sincerely,



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



eco-fresh® Brand

KILLS FLEAS - COCKROACHES - ANTS - SILVERFISH - ODORLESS - NON-STAINING

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION:

HARMFUL IF SWALLOWED. MAY CAUSE EYE IRRITATION. AVOID EYE CONTACT. WASH THOROUGHLY AFTER HANDLING.

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 in homes, restaurants, and other food handling establishments, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, industrial plants, theatres, ships, boats, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities and sewers.

APPLICATION DIRECTIONS:

To Control Fleas: Apply only when children and pets do not have access to treatment areas. Avoid contamination of feed and foodstuffs.

Carpets: Carpets should be vacuumed thoroughly and/or cleaned before treatment. Apply to dry carpet surfaces only, at the rate of one pound per 150 square feet (21 mg/sq in) where pets frequently traffic, rest or sleep. Other areas apply at the rate of one pound per 200 square feet. Brush powder deep into the fibers and mat using a broom, rug rake or professional equipment such as Host or Certified Carpet Machines. Any powder visible after treatment must be further brushed into carpet pile. Allow three weeks to achieve maximum results. Reapply as necessary.

Upholstery: Remove cushions and vacuum thoroughly. Apply into the wells of furniture. Do not apply to exposed fabric surfaces. Any powder visible after treatment must be brushed into furniture wells, crevices, corners and/or removed.

To control cockroaches, ants and silverfish, apply liberally, using a bulb duster under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer, tubs; into openings around drains, water pipes and electrical conduits; and in cracks and crevices along baseboards and corners of cabinets, cupboards, and closets. Remove all lower drawers in kitchen and bathroom cabinets, bedroom dressers and chests of drawers, then dust liberally in drawer wells.

Any powder visible after application must be brushed into cracks and crevices or removed. Reapply as necessary.

NON-DOMESTIC USE (NONEDIBLE PRODUCT AREAS ONLY)

USE RESTRICTIONS:

Apply only in areas inaccessible to children and pets. Do not use in edible product areas of food handling establishments, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed.

DIRECTIONS FOR APPLYING IN NEW AND EXISTING CONSTRUCTION TO CONTROL COCKROACHES:

When treating large areas, such as wall voids, soffit and voids in new and existing construction, dust liberally using dusting application equipment.

DIRECTIONS FOR APPLYING IN SEWERS AND MANHOLES: Apply at a rate not to exceed 4 pounds per 1,000 sq. ft. using air pressure equipment or portable dusting equipment.

DIRECTIONS FOR APPLYING AS A MOP SOLUTION TO CONTROL COCKROACHES:

MIXING AND APPLICATION DIRECTIONS:

Add 1 cup of powder to each gallon of rinse water. Apply to floor areas only. Make only enough for each application. Supplemental treatment only. Reapply as necessary. Avoid contamination of feed and foodstuffs.

Active Ingredient:	
Orthoboric Acid	64.00%
Inert Ingredients	36.00%
	<hr/>
	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

STATEMENT OF PRACTICAL TREATMENT

If swallowed, contact physician. If in eyes, flush eyes with plenty of water. Get medical attention if irritation persists.

ACCEPTED
with COMMENTS
in EPA Letter D-88-10

other precautions on this label.

NET CONTENTS 25 LB. (11,325 kilos.)

07 DEC 1988

EPA REG. No. 66480-1

EST No. 66480-TX-001

EST No. 66480-UT-001

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

66480-1

BATCH NUMBER



eco-safe®

Manufactured By:
eco-fresh® Industries, Inc.
3001 Wheelock, Suite C
Dallas, TX 75220
214-358-0147

FOOD

Places other than processed, prepared or

1. FOOD AREAS (NON-FOOD SERVING AREAS)
Includes areas for receiving, boxing, preparation systems (mills, dials) SERVING AREAS.

FOOD SERVING AREAS
SERVING AREAS are but not where food is AREAS when food is plication directions is not in operation, FOING AREAS below.

USE RESTRICTION:
FOOD AREA applicati ONLY. Applications t

APPLICATION DIRECTIONS:
Apply in small amount duster or other suitable into cracks and crevices, between edge hollow spaces in walls ing and electrical sw be taken to avoid de producing the materi processing surfaces.

2. NON-FOOD AREA
Includes garbage room vestibules, offices, loc mop closets and stor SERVING AREAS.

NONFOOD SERVING AREAS
SERVING AREAS are (but not where food is FOOD AREAS when it

FOLLOW APPLICATION
posed and the facility FOOD SERVING ARE

APPLICATION DIRECTIONS:
Apply as a spot treat under elements of ce surfaces likely to be

APPLICATION DIRECTIONS:
Apply to baseboard beneath sinks, locker hide or through whk

Do not contaminate STORAGE:
Store in a dry place. access.

PESTICIDE DISPOSAL:
Wastes resulting from site or at an approv **CONTAINER DISPOSAL:**
Do not reuse contain puncture and dispos