

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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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, 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 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.

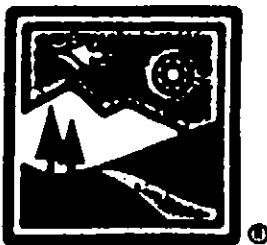
2. Regarding product 66480-2: the data presented in MRID Number 428634-01 are adequate to support the claim for prevention of emergence of adult cat fleas *Ctenocephalides felis* from carpet and upholstery treated with a solution of 12 ounces of powder per gallon of warm water applied according to the 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

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							



# ēco-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 4.0 g. per sq. ft. (1.0 oz. per 100 sq. ft.) where pets frequently traffic, rest or sleep. Other areas apply at the rate of 1.0 g. per 200 square feet. Brush powder deep into the fibers and mat using a broom, rug rake or professional equipment such as Hot 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.

For use as a spray for carpet, furniture, baseboards, pet bedding, concrete and dirt floors. Spray can be used on any surface that is not damaged by water. Test a small area before treating furniture. Mix 1/2 oz. of powder per gallon of warm water in a clean spray tank. Shake sprayer and lightly fog spray carpet. Do not saturate when treating furniture, remove cushions and lightly fog spray furniture wells.

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:	
Dipotassium Octaborate Tetrahydrate	98.00%
Inert ingredients	2.00%
	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.

See other precautions on this label.  
ACCEPTED with COMMENTS  
by EPA LINE D-000 CONTENTS 25 LB. (11,325 kilos.)

07 DEC 1992

EPA REG. NO. 68480-2

EPA EST. NO. 066480-TX-001

EPA EST. NO. 066480-UT-001

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

68480-2



ēco-safe®

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

FOOD

Places other than prepared, prepared or

1. FOOD AREAS (NON-FOOD SERVING AREAS)  
Includes areas for receiving, boxing, preparation systems (mills, dairies), and food processing areas.

FOOD SERVING AREAS  
FOOD SERVING AREAS are those areas where food is prepared, but not where food is processed. Includes areas for receiving, boxing, preparation systems (mills, dairies), and food processing areas.

USE RESTRICTION:  
FOOD AREA applications ONLY. Applications to non-food areas are prohibited.

APPLICATION DIRECTIONS:  
Apply in small amounts with a bulb duster or other suitable equipment into cracks and crevices, under construction, between equipment, hollow spaces in walls, and electrical switch boxes. Do not be taken to avoid depositing the material on food processing surfaces.

2. NON-FOOD AREAS  
Includes garbage room, vestibules, offices, locker rooms, mop closets and storage areas.

NONFOOD SERVING AREAS  
NONFOOD SERVING AREAS are those areas where food is prepared, but not where food is processed. Includes areas for receiving, boxing, preparation systems (mills, dairies), and food processing areas.

FOLLOW APPLICATION DIRECTIONS  
posed and the facility is a FOOD SERVING AREA.

APPLICATION DIRECTIONS  
Apply as a spot treatment under elements of construction surfaces likely to be contaminated.

APPLICATION DIRECTIONS  
Apply to baseboard areas beneath sinks, lockers, hide or through which

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

PESTICIDE DISPOSAL:  
Wastes resulting from this site or at an approved CONTAINER DISPOSAL. Do not reuse container. puncture and dispose of