

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

28 OCT 1994

Mr. John Marshall
Flea Control Systems, Incorporated
25601 Narbonne Avenue, Suite #4
Lomita, CA 90717

Dear Mr. Marshall,

Subject: Amendment-Reformulation
FC33
EPA Registration Number 66764-1
Submission Dated April 5, 1994

The amendment 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. One (1) copy of the final printed labeling must be submitted prior to releasing the product for shipment. A stamped copy of the product label is enclosed for your records.

The new basic formulation dated April 5, 1994 has become the formulation of record for this pesticide product. Any formulation which had been accepted prior to the date of this letter is no longer acceptable under this product registration.

1. Regarding the submitted Confidential Statement of Formula (CSF):

- a. Provide the *Upper and Lower Certified Limits* (columns 14a and 14b) for each formulation component.
- b. Provide the % by weight (column 13b) for each formulation component.
- c. Provide the units associated with the declaration "5 lbs." which appears in Box 7. The designation "5 lbs." is a weight and not a density.
- d. Provide the CAS Registry number(s) for each formulation component. Also, the compound *sodium sulphate* is not a recognized inert ingredient. Perhaps the correct spelling is *sodium sulfate*.
- e. Designate only the brand name of record (FC33) in Box 3 on the CSF.

2. Regarding the proposed product label:

- a. The two label claims listed below are not acceptable. Delete this text from the product label.
 - (1) Recommended by veterinarians and breeders
 - (2) Recommended by pet care specialists.

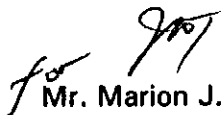
CONCURRENCES

SYMBOL							
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b. It is not necessary that the **STATEMENT OF PRACTICAL TREATMENT** appear twice on the product label. You may delete one of these two declarations.

Sincerely,



Mr. Marion J. Johnson, Jr.
Acting Product Manager 10
Insecticide-Rodenticide Branch
Registration Division

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

FC-33 may be used in homes, restaurants and other food and food handling establishments, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery

stores, apartment buildings, new construction, industrial plants, theaters, ships, boats, trains, trucks, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities and sewers

Domestic (Homeowner Use) Fleas

Prior to application: If carpets need to be cleaned, do so before application. Carpets must be completely dry. All carpeted closet floors should be cleared. Electronic equipment, fish tanks and animal cages must be covered. Children and pets should be removed from treatment area until application is complete.

Directions for Use:

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Flea Control Systems, recommends using 3-5 lbs of FC-33 per 1000 sq. ft. of carpeted area. Quantities will vary depending on carpet type
Apply directly on carpets where pets frequently traffic or sleep. Sprinkle FC-33 lightly over all carpeted areas, including closets, area rugs, under beds and non-traffic areas. Using a carpet rake or a push broom, sweep powder into carpet fibers until it is no longer visible. Any visible product remaining after application must be removed by further grooming or lightly vacuuming.
Upholstery. Remove loose cushions. Apply along creases and into corners and furniture wells. Do not apply product to exposed fabric. Any visible product after application must be removed. Allow 3-5 weeks for maximum effectiveness. With proper application, effective period is one year.

After Application: Wait at least 24 hrs. after FC-33 is applied for normal vacuuming of carpets. Remove vacuum bag and dispose. If carpets are steamed or shampooed, reapplication is necessary and effective period is no longer valid.

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals
CAUTION

Use Restrictions: It is advisable when handling any type of chemical product to use gloves. Do not treat pets with this product. Avoid contamination of food and feedstuff. Avoid contamination of ornamental plants. Harmful if swallowed. May cause eye irritation. Wash thoroughly after handling.

STORAGE & 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:** Securely wrap original container in several layers of newspaper and discard in trash. **CONTAINER DISPOSAL:** Do not reuse. Discard in trash.

STATEMENT OF PRACTICAL TREATMENT

If in eyes: Flush with plenty of water. Get medical attention if irritation persists. **If on skin:** Wash with soap and water. **If swallowed:** Drink large amounts of water. Get medical attention. **If inhaled:** Remove to fresh air.

ACCEPTED
With COMMENTS
In EPA Letter Dated
28 OCT 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for use as
registered under

66764-1

FC-33

Effectively Controls Fleas on Carpets and Furniture and Cockroaches, Ants and Silverfish in cracks and Crevices and on Hard Surfaces.

One Year Guarantee

ACTIVE INGREDIENT:

Boric Acid 97%

(Boric Oxide(B₂O₃) Equivalent
56.3%)

Inert Ingredient 3%

Net Wt. 5lbs.

KEEP OUT OF REACH OF CHILDREN

Caution: See side panel for additional precautionary statements

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**DOMESTIC (HOMEOWNER USE)
COCKROACHES, ANTS AND SILVERFISH**

Use Restrictions: Apply only in areas inaccessible to children and pets. Avoid contamination of food and foodstuffs.

Application Directions for Cockroaches, Ant and Silverfish Control: Apply liberally, scattering 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 scatter 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 eating 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 subcabinet voids in new and existing construction, dust liberally using dusting application equipment.

Directions for Applying in Sewers and Manhole Cavities: Apply this product at a rate not to exceed 12 oz. per 100 sq. ft. using portable blowers or air pressure tanks.

Directions for Applying as a Top 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. Any powder visible after application must be brushed into cracks and crevices or removed. Avoid contamination of food and foodstuffs.

FOOD HANDLING ESTABLISHMENTS

Places other than private residences in which food or feed is held, processed, prepared, or served.

1. FOOD AREAS (INCLUDING SOME SERVING AREAS)

Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and animal processing systems (mills, driers, edible oils, syrups). Also includes some SERVING AREAS.

FOOD SERVING AREAS

SERVING AREAS are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered **FOOD AREAS** when food is exposed and the facility is in operation. Follow application directions in this section. If food is not exposed and facility is not in operation, follow application directions under **NONFOOD SERVING AREAS** below.

Use Restrictions: **FOOD AREA** application is limited to **CRACK AND CREVICE TREATMENT ONLY**. Applications to other areas are not permitted.

Application Directions: Apply in small amounts directly into cracks and crevices using a bulbous duster or other suitable equipment capable of applying insecticides directly into cracks and crevices, in joints between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases, conduits, motor housing and electrical switch boxes where cockroaches hide.

Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

2. NONFOOD AREAS (INCLUDING SOME SERVING AREAS)

Includes garbage rooms, lavatories, floor drains (to sewer), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Also includes some **SERVING AREAS**.

SERVING AREAS are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered **NONFOOD AREAS** when food is not exposed and the facility is not in operation.

Follow application directions in this section. If food is exposed and the facility is in operation, follow application directions under **FOOD SERVING AREAS**.

Application Directions: Apply as a spot treatment to selective surfaces such as baseboards, under elements of constructions into cracks and crevices. Avoid treating surfaces likely to be contacted by food.

OTHER NONFOOD AREAS

Application Directions: Apply to baseboards areas, around water pipes, surfaces behind and beneath sinks, lockers, tables, patios and similar areas where insects hide or through which they may enter.

BEST AVAILABLE COPY

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**WE WOULD LIKE TO
REQUEST THE USE OF THE
FOLLOWING CLAIMS:**

- 1. CARPET POWDER FOR
FLEA CONTROL**
- 2. SIMPLE APPLICATION**
- 3. NO MESSY DUST**

**4. RECOMMENDED BY
VETERINARIANS AND
BREEDERS**

**5. RECOMMENDED BY PET
CARE SPECIALISTS**

6. KILLS FLEAS DEAD