

5 MAY 1995

Mr. James Burnett
The Ecology Works
P.O. Box 323
San Geronimo, CA 94963

Dear Mr. Burnett:

Subject: Alternate Brand Name and Change of Source
The Ecology Works Insecticide
EPA Registration Number: 67419-1
Applications Dated: March 22, and 24, 1995

The alternate brand name Fleanix is acceptable. However, on this product label you must delete the paragraph "Ecology Works wants to spread.....and their pets". This is a false or misleading statement, pursuant to 40 CFR 156.10(a)(5).

Your Confidential Statement of Formula is not acceptable. Currently, the Agency believes that you are using Tim-Bor as your source material. However, it is unclear from this amendment whether you are adding Polybor as an alternate source or as the new source for your basic formulation.

If you wish to continue to use Tim-Bor as your basic source, but would like to use Polybor as an alternate source, you must submit a new CSF for an alternate formulation. (The CSF must include the EPA Registration Number for this alternate source material).

This must be submitted as an amendment.

If you want to discontinue using Tim-Bor as your primary source for your product, you must submit an amendment replacing the current CSF with a new CSF indicating your new source material. (The CSF must include the EPA Registration Number for this alternate source material). **Again, this must be submitted as an amendment.**

Solubor is not acceptable. If you wish to use this unregistered source of boric acid, you **will not qualify** for this formulator's exemption, pursuant to 40 CFR 158.50.

If you have any questions regarding this matter, please contact Melody Banks of my staff on (703) 305-5413.

Sincerely,

RSJ

Richard P. Keigwin, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division (7505C)

ACCEPTED
with COMMENTS
in EPA Letter Dated

5 MAY 1995

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

67419-1

FLEANIX™

FLEA CONTROL

FOR PROTECTION AND
TREATMENT OF CARPET AND
UPHOLSTERED FURNITURE
AGAINST FLEA INFESTATION

Makes enough liquid solution to treat
650 Sq. Ft. of carpet.

Active ingredients:

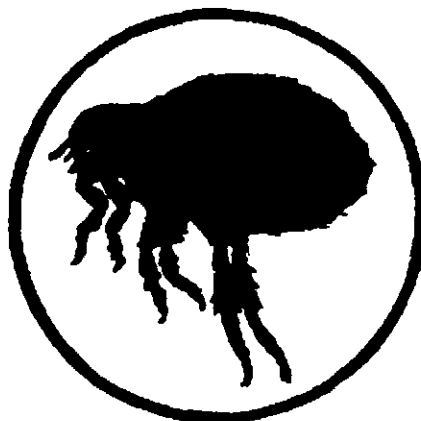
Dianthion Octaborne Tetrahydrate ($\text{Na}_2\text{B}_2\text{O}_7 \cdot 4\text{H}_2\text{O}$) 98%

Inert ingredients: 2%

CAUTION:

Keep out of reach of children

See side and back panels for additional precautionary statements.



EPA Reg. No. 67419-1



THE ECOLOGY WORKS™

Ecology Works wants to spread the word
there are ways to deal with pests that
ecologically sound! Helping people do things
themselves, this remedy is an important aid
healthy lifestyle for pet owners and their
Guaranteed to control fleas in carpet for one entire
season (or between carpet cleanings) when used
according to label instructions or your money back.
This container is manufactured with at least 25% rec-
ycled plastic.

THE ECOLOGY WORKS Inc.
P.O. Box 323 San Geronimo, CA 94963

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FILEANIX™

Deodorizes • Freshens Carpets • Leaves Pleasant Scent



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION:

Harmful if swallowed. Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food and feed. Do not have children enter children or animals any play rooms.

Symptoms of Possible Treatment

If Swallowed: Immediately contact a physician or poison control center. If there are vomitables, give 1 or 2 glasses of water and induce vomiting by washing back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If In Eyes: Flush with plenty of water. Contact a physician if irritation persists.

If On Skin: If skin is irritated no treatment necessary. If skin irritation can't wash with soap and water. Wash clothing prior to reuse.

If Inhaled: Seek fresh air. Contact a physician if worsened.
24 HOUR EMERGENCY ASSISTANCE
1-800-238-5439

THE ECOLOGY WORKS™

DIRECTIONS FOR USE

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

When used with water, the contents of this container will cover about 37 x 17' carpet or 650 sq. ft. FILEANIX™ is an effective long lasting deodorizer for carpets and upholstered furniture; against the odor. FILEANIX™ keeps the good odor of the film in the front edge lasting long term protection. This process can take 2-5 weeks to be fully effective. For immediate relief to some of these film odors, it may be necessary to deodorize with a product treatment that will work quickly to end the film and give short term coverage until the good odor is back.

PREPARATION OF SOLUTIONS: In a clean bucket (or cleaning machine depending used) mix 1 cup of FILEANIX™ in each gal. of water.

APPLICATION RATE: For normal of film in carpet, apply 2 gal. of solution per 100 sq. ft. by using a low water carpet cleaning machine covering half the amount of solution applied back into the remaining work. This process allows the solution deep into the carpet and the carpet fibers and film and eggs that are already in the carpet. Avoid contact with carpet until dry.

For normal of film in upholstery apply FILEANIX™ to the under side of cushions and into the web of upholstered furniture with a low water carpet cleaning machine, machine using the upholstery cleaning head. Allow to dry thoroughly before replacing cushions. If upholstered furniture fabric is sensitive to moisture apply FILEANIX™ as a powder, allowing the web and under cushions then vacuum excess powder by vacuuming.

STORAGE AND DISPOSAL

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

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

DISPOSAL: Do not reuse empty container; wrap and place in trash collection.

NET WEIGHT: 2.6 LBS

Net Cals