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Systems Integration Group, Inc.

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67425-2

6/4/99

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 04 1999

Mr. Steven Bessette  
EcoSMART Technologies Inc.  
555 Sun Valley Drive  
Roswell, GA 30076

Subject: Label amendment and minor formulation changes for EcoPCO™ D  
EPA Registration No. 67425-2

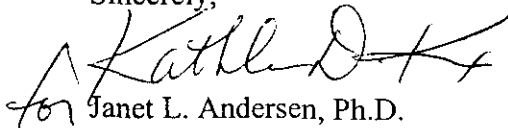
Dear Mr. Bessette:

We have completed our review of the label amendments and minor formulation changes for EcoPCO™ D, submitted with your letter dated December 8, 1998. We have no objections to the proposed amendments and minor formulation changes for this product. A stamped copy of the product label is enclosed.

However, we do object to the use of this product to mitigate the public health pests: cockroaches, and fleas. You must either delete these pests (i.e., cockroaches and fleas) from the product label, or submit/cite efficacy data supporting claims for mitigating both of these public health pests.

Questions concerning our decision for this product should be directed to Richard King at (703) 308-8052.

Sincerely,



for Janet L. Andersen, Ph.D.

Director

Biopesticides and Pollution

Prevention Division (7511C)

Enclosure; Approved label

CONCURRENCES

SYMBOL	7511C	7511C					
SURNAME	R. King	Riley	KNOX				
DATE	6/1/99	6/3/99	6/4/99				

094

12/8/98 11:40 AM

USA

# EcoPCO™ D

DUST INSECTICIDE

(LOGO)™

EcoSMART Technologies Inc.  
Atlanta, GA

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

**JUN 04 1999**

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

67425-2

**ACTIVE INGREDIENT:**

**Hexa-Hydroxyl™**

From Plant Essential Oils: Eugenol.....	2.5%
2-Phenethyl Propionate.....	3.75%

**OTHER INGREDIENTS:** ..... 93.75%

Hexa-Hydroxyl™ is the common molecular structure within many different tree oils.  
University-tested and proven to kill and control a broad spectrum of insects.

**Kills:**

Ants, bedbugs, carpet beetles, centipedes, cockroaches, crickets, earwigs, firebrats/silverfish,  
fleas, millipedes, sowbugs/pillbugs, spiders, and other indoor insect pests.

- Quick Knockdown
- Residual Protection
- Non-Staining and Non-Corrosive
- Non-Clumping
- Water-Resistant
- Reduced Risk Pesticide

Fresh Scent

EPA Reg. No. 67425-2  
EPA Est. No. 58995-MO-1

**CAUTION**  
**KEEP OUT OF REACH OF CHILDREN**

See back panel for Statement of Practical Treatment

NET CONTENTS: 32 OZ.

EcoPCO™ D is a specifically formulated dust for the professional pest control operator for residential, commercial and food handling areas.

**DIRECTIONS FOR USE:**

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. EcoPCO™ D is intended for indoor applications using its own container; a hand-held or power duster is also appropriate. **Shake well before using.**

**For Crack/Crevice and Void Treatments:** Apply uniformly in and around areas where insects may be crawling, hiding, or living. The amount to be applied will vary depending on the severity of the problem and the site treated, but should be in the range of 1 to 2 ounces per 100 square feet of surface area. Applications should include, but are not limited to, cracks/crevices and void areas around and behind walls, cabinets, baseboards, moldings, pipe openings, electrical outlets, window and door frames and appliances. Repeat as necessary.

**For Broadcast Treatments (Attics, Crawl Spaces, False Ceilings, etc.):** Apply uniformly around the perimeter and in and around areas where insects may be hiding or living. Apply at a rate of 12 to 16 ounces per 1000 square feet of surface area, depending on the severity of the problem. Repeat as necessary.

**For Treatments in Commercial Food Handling Establishments:** Applications of this product in the food areas of food handling establishments is limited to void or crack and crevice treatment. The amount to be applied will vary depending on the severity of the problem and the site treated, but should be in the range of 1 to 2 ounces per 100 square feet of surface area. Use equipment capable of applying dust directly into voids, cracks and crevices between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where insects hide. Repeat as necessary.

**Question or Comments:** Call 1-888-326-7233 weekdays, 9:00 a.m. to 5:00 p.m. EST.

**Chemical Safety Information:** Call 1-800-535-5053 anytime (InfoTrac Chemical Response System)

**Storage & Disposal:** Do not contaminate water, feed or foodstuffs by storage or disposal. Store only in original container in a cool, dry place inaccessible to children and pets. Prevent cross contamination with other pesticides. Bottles/pails: Do not reuse bottle/pail. Rinse thoroughly before discarding in trash. Bags: Do not reuse bag. Discard bag in trash.

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

- **CAUTION:** Avoid breathing dust. Avoid contact with eyes.

**STATEMENT OF PRACTICAL TREATMENT**

**IF IN EYES:** Wash with plenty of water. Consult physician if irritation persists.  
**IF INHALED:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

**Limitation of Liability:** EcoSMART Technologies, Inc. makes no warranties of merchantability, or of fitness for a particular purpose, nor any other expressed or implied warranty except as stated above.

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Roswell, GA 30076  
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Made in USA  
U.S. Patent No. 5,439,690 / 5,693,344  
U.S. and Foreign Pat. Pending  
CODE PCD1032Z (USA)

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