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Systems Integration Group, Inc.

FM 91

67425-4

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™ AC
EPA Registration No. 67425-4

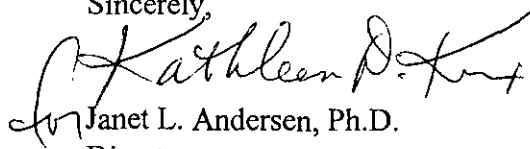
Dear Mr. Bessette:

We have completed our review of the label amendments and minor formulation changes for EcoPCO™ AC, 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, fleas, gnats, and mosquitoes. You must either delete these pests (i.e., cockroaches, fleas, gnats, and mosquitoes) from the product label, or submit/cite efficacy data supporting claims for mitigating both of these public health pests. Also you must delete the phrase "Contains no.CFC's or ozone depleting substances" from the product labeling.

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

Sincerely,



Janet L. Andersen, Ph.D.
Director
Biopesticides and Pollution
Prevention Division (7511C)

Enclosure; Approved label

CONCURRENCES

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

EcoPCO™ AC

CONTACT 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.
67425-4

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 a broad spectrum of insects.

Kills:

CRAWLING INSECTS: Ants, carpet beetles, centipedes, cockroaches, crickets, earwigs, millipedes, pillbugs, scorpions, spiders and other indoor insect pests, including fleas and mites.

FLYING INSECTS: Clothes moths, flies, gnats, mosquitoes, moths, yellow jackets, wasps, hornets, and other flying insect pests.

- Quick Knockdown
- Strong Flushing Action
- Leaves No Visible Residue
- Reduced Risk Pesticide

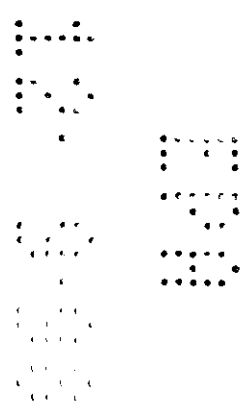
Fresh Scent

EPA Reg. No.: 67425-4
EPA Est. No.: 46813-CN-03

CAUTION
KEEP OUT OF THE REACH OF CHILDREN

See Back panel for Statement of Practical Treatment.

NET CONTENTS: 14 OZ.



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

394

DIRECTIONS FOR USE:

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

Shake well before using.

For Crack/Crevice and Void Treatments: use the injector nozzle tip provided, and inject into all crack/crevice and void spaces where insects may be crawling, hiding or living. Release approximately 1 second of product per crack/crevice application and from 2 to 3 seconds per cubic foot of closed void space treated. Apply more liberally for heavy infestations. Applications can be made, but are not limited to, behind baseboards, cabinets, walls, ceilings, door and window frames, and around water pipes and appliances. Ensure contact with as many insects as possible. Repeat as necessary.

For General Surface Treatment: Fleas- hold can approximately 3 feet above surface area and apply uniformly at a rate of 10 seconds per 100 sq. ft. to infested areas such as carpets, rugs, cloth upholstery and pet bedding. Repeat treatment after 7 days or as necessary.

For General Volumetric Treatment: General Pests-open cabinets and doors in area to be treated. Close doors and windows before applying. Apply at a rate of 10 seconds per 500 sq. ft. of space. Release towards areas of suspected infestation. Contact as many insects as possible. Keep area closed for 15 minutes. Repeat as necessary.

For Volumetric Treatment For Void Areas (attics, false ceilings and crawl spaces): apply at a rate of 20 to 30 seconds per 1000 cubic feet. Repeat as necessary.

For Flying Insect Treatment: close all windows and doors. Apply upwards in wide swaths towards target pest at a rate of 3 to 5 seconds per 1000 sq. ft. Wait 30 minutes before opening windows/doors. Repeat as necessary.

For Wood Injection Treatment: Drywood Termites- spot treatment for localized infestation. Probe to locate galleries, drill holes and inject 5-10 seconds spray per hole into active galleries. **Powder Post Beetles-** treat infested wood using injection tube. Apply small amounts directly into and around entrance holes.

EcoPCO™ AC will not stain carpet, floors or walls.

Questions 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)

VOC compliant in all states.

Storage & Disposal: Store in a cool, dry area away from heat or open flame. When container is empty, recycle if available. If recycling is not available, wrap and place the empty container in a trash collector. Do not puncture or incinerate.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

- **CAUTION:** Harmful if swallowed. Wash thoroughly with soap and water after handling. Avoid contact with eyes. Harmful if inhaled. Avoid breathing spray mist. Remove contaminated clothing and wash clothing before reuse.
- Avoid contact with food, utensils and food preparation areas.
- **Food Areas of Food Handling Establishments:** Foods should be removed or covered during treatment. Either cover food processing equipment or wash/wipe any excess. Apply only when plant is not in operation.
- **Notice to Applicator:** During any volumetric treatment, wear an approved pesticide respirator.
- **Physical or Chemical Hazards:** Extremely Flammable. Contents under pressure. Keep away from heat, sparks, and open flame. Do not use this product in electrical equipment. Do not puncture or incinerate container. Exposure to temperatures above 130° may cause bursting.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.

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.

4044

~~Contains no CFC's or other ozone depleting substances.~~ (CFC Logo) (Steel Recycle Logo)

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Roswell, GA 30076
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U.S. and Foreign Pat. Pending
CODE PCAO514Z (USA)

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