

67425-14

09/30/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

September 30, 2008

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Amy Plato Roberts  
Regulatory Consulting for  
EcoSmart Technologies, Inc.  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, DC 20036

RE: Product Name: EcoPCO Acu  
EPA Reg. No: 67425-14

Application for Label Notification dated July 18, 2008 and a Revised Label  
Dated September 30, 2008 to Add Optional Label Claims

Dear Ms. Roberts:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PRN 98-10 and it has been determined that the action(s) requested falls within the scope of PRN 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

Questions concerning this action should be directed to Ms. Diana Hudson at (703) 308-8713 or email at [hudson.diana@epa.gov](mailto:hudson.diana@epa.gov).

Sincerely,

*Linda Hollis*

Linda Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention  
Division (7511P)



July 18, 2008

**WASHINGTON**

1150 18th Street, N.W.  
Suite 1000  
Washington, D.C. 20036  
Telephone 202 223-4392  
Fax 202 872-0745

Linda Hollis  
Chief, Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention Division (7511P)  
Office of Pesticide Programs, EPA  
One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

**RE: EcoPCO® ACU  
EPA Reg. No. 67425-14**

**NOTIFICATION to add optional label claims**

**SACRAMENTO**

712 Fifth Street  
Suite A  
Davis, CA 95616  
Telephone 530 757-1298  
Fax 530 757-1299

Dear Ms. Hollis:

Enclosed with this letter you will find the following in support of a label notification per PRN 98-10 to add optional label claims for the above referenced product:

- 1) Notification form;
- 2) One (1) copy of the revised label with changes highlighted in red.

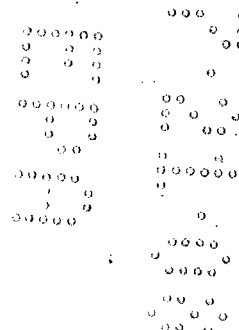
Label changes made are:

- a. Consistent with 40 CFR Part 156; and
- b. Involve no change in the ingredients statement, signal word, use classification, precautionary statements, First Aid, physical / chemical / biological properties, storage and disposal or use rates and application method.

Optional label claims added are consistent with Chapter 12 of the EPA Label Review Manual and other guidance provided by the Agency on label claims. If you have any questions or comments, please do not hesitate to let me know.

Sincerely,

Amy Plato Roberts  
Regulatory Consultant for EcoSMART Technologies, Inc.  
Direct dial: (202) 828-8964; Email: [aroberts@tsgusa.com](mailto:aroberts@tsgusa.com)





United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 67425-14	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) EcoPCO ACU	PM# 91/Biochemical Pesticides/BPPD	
5. Name and Address of Applicant (Include ZIP Code) EcoSMART Technologies, Inc. 3600 Mansell Road, Suite 150 Alpharetta, GA 30022 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**NOTIFICATION**  
 Date Reviewed: 9-30-08  
 Reviewed By: D. Hudson

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

NOTIFICATION to add optional label claims. Refer to cover letter dated July 18, 2008 for details.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	Other (Specify) _____	
		If "Yes" Package wgt	No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> on container label	
6. Manner in Which Label is Affixed to Product			<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	<input type="checkbox"/> Other _____	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Amy Plato Roberts / aroberts@tsgusa.com	Title Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8964	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant		
4. Typed Name Amy Plato Roberts	5. Date July 18, 2008		

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# EcoPCO® ACU

(Alternate Brand Name: "EcoSMART® Ant & Roach Killer")

## NOTIFICATION

### ACTIVE INGREDIENT:

2-Phenethyl Propionate .....0.10%

OTHER INGREDIENTS\*: .....99.90%

100.00%

Date Reviewed: 9-30-08

Reviewed By: D. Hudson

\*Contains petroleum distillates

EPA Reg. No. 677425-14

EPA Est. No. XXXXX-XX-XXX

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**See Side/Back Panel for Additional Precautions and First Aid**

NET CONTENTS: XX

EcoPCO® ACU (EPA Reg. No. 67425-14)

NOTIFICATION to add optional label claims

MASTER LABEL - Label version (3b) dated September 30, 2008

Page 1 of 4

### 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.

This product is a contact spray and will not prevent reinfestation of any listed pest in any treated area. Insects must be contacted by spray in order to ensure 100% mortality.

The following table provides the minimum and maximum time to obtain 100% contact mortality for tested insects in the laboratory. Flushing action and knockdown time were not measured in this testing.

Insect Pest	Minimum Time to 100% Contact Mortality	Maximum Time to 100% Contact Mortality
Southern fire ants	1 minute	5 minutes
Carpenter ants	1 hour	24 hours
Cat fleas	1 minute	5 minutes
Brown dog ticks	1 hour	1 hour
House flies	1 minute	1 minute
American cockroaches	5 minutes	5 minutes
German cockroaches	1 minute	5 minutes
Southern house mosquitoes	15 minutes	1 hour
Cellar spiders	5 minutes	5 minutes
Wolf spiders	5 minutes	5 minutes
European earwigs	1 minute	1 minute
Carpet beetle larvae	1 minute	1 minute
Field crickets	1 minute	1 minute
Silverfish	5 minutes	5 minutes
Pantry Pests (including beetles, moths, mites, weevils)	1 minute	1 minute
Nuisance Ants (including Argentine, thief, little black, big-headed, pavement, leafcutter, acrobat, odorous house, velvety tress, pyramid, field, crazy, cornfield and large yellow ants)	1 minute	1 minute
Occasional invaders (including centipedes, millipedes, crickets, earwigs, pillbugs, sow bugs, lady beetles)	5 minutes	5 minutes

**For Crawling Insects: Crack/Crevice and Void Treatments:** Important – Use the green injector nozzle tip provided. Inject into all crack/crevice and void spaces where insects are present. Applications can be made, but are not limited to, behind baseboards, cabinets, walls, ceilings, door and window frames, and around water pipes and appliances. Insects contacted by spray will be killed. Ensure contact with as many insects as possible. **Fire ants & carpenter ants:** This product will not kill ant queens or ant colonies. **Fleas & Brown Dog Ticks:** Hold can approximately 12 inches (30 centimeters) above surface area and apply uniformly to infested areas such as carpets, rugs, cloth upholstery and pet bedding. Contact fleas & ticks directly to kill these pests.

**For Flying Insect Treatments:** To kill these pests, aim spray toward flying insect infestations contacting as many insects as possible. Insects contacted by spray will be killed. Wipe away excess spray after application. Avoid spraying plants.

[For Product Information: Call 1-888-326-7233 weekdays, 9:00 a.m. to 5:00 p.m. CST.]

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

**Storage & Disposal**

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

**Storage:** Store in a cool, dry area away from heat or open flame.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Do not puncture or incinerate! If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

**PRECAUTIONARY STATEMENTS  
Hazards to Humans & Domestic Animals**

**CAUTION**

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear safety glasses, safety goggles, or face shield. Wash Thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

**Physical or Chemical Hazards**

Flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

**Environmental Hazards**

For terrestrial uses: Do not apply to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

**FIRST AID**

<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-535-5053 anytime for emergency medical treatment.

**NOTE TO PHYSICIAN**

Contains petroleum distillate – vomiting may cause aspiration pneumonia.

**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.

[www.ecopco.com](http://www.ecopco.com)

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Alpharetta, GA 30022  
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U.S. Patent No. 6,004,569  
U.S. and Foreign Pat. Pending  
CODE PCAO617Z (USA)

EcoPCO® and the EcoSMART Technologies logo are registered trademarks of EcoSMART Technologies, Inc.

(CFC Logo – Contains no CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.)

(Steel Recycle Logo)

**Optional Label Claims:** [ ] Denotes alternate text in addition to any subset of the directions for use.

[Kills the Following Crawling Insects Only on Contact [On Contact Only]: fire ants, carpenter ants, Argentine ants, American & German cockroaches, cat fleas, cellar spiders, wolf spiders, brown dog ticks, European earwigs, carpet beetle larvae, field crickets, pantry pests, nuisance ants, centipedes, millipedes, silverfish, pillbugs & sow bugs]

[Kills the Following Flying Insects Only on Contact: house flies, southern house mosquitoes & lady beetles]

[Kills only on contact]

[Kills bugs]

[Kills insect pests, such as: (list any pest from Directions for Use table on page 2 of this label)]

[Kills most common household (insects) (pests)]

[For use in Residential Areas]

[For use in Commercial Areas]

[For (Indoor) (and) (Outdoor) Use]

[Complies with all VOC limitations, both Federal and CARB]

[Unscented]

[No odor]

[Odorless]

[Leaves No Visible Residue]

[EcoPCO® ACU will not stain carpet, floors or walls]

[Non-staining]

[Biopesticide]

[Contact Insecticide]

[Botanical active ingredient (insecticide)]

[Active ingredient from plant(s) (essential) (oils)]

[(An) insecticide from plant(s) (essential) (oils)]

[(Powered by) (based on) (comes from) plant oils]

[Synergized plant oils]

[Targets insects, not people or pets]

[Good for you, bad for bugs]

[(Non-toxic) (unique) mode of action]

[(Can be used) (for use) around children and pets]

[(Can be used) ((ideal) for use) in kitchens and other sensitive areas]

[Ideal for (home) use]

[Leaves no harmful residue]

[Does not persist in the environment]

[No harsh chemicals]

[(Not hazardous) (Not harmful) to people, pets or the environment]