

MAR 1 2005

Sharon M. Johnston  
EcoSMART Technologies, Inc.  
c/o RegGuide  
509 Tower Valley Drive  
Hillsboro, MO 63050

Subject: EcoPCO AR/X  
EPA Registration No. 67425-15  
Application dated August 31, 2004

Dear Ms. Johnston:

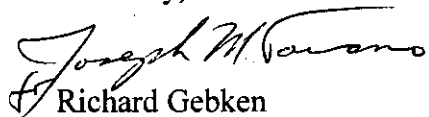
The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended requesting 4 week residual claims is acceptable subject to the comments listed below:

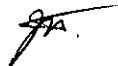
- 1) The 4 week residual claim for ants is acceptable.
- 2) The claim for 4 week residual control of cockroaches is not acceptable and must be deleted from the label. The supporting data does not show 90% or greater control for 4 weeks. Refer to the enclosed Efficacy review.
- 3) Delete the claims, "a botanical insecticide", from the ingredients statement.

A stamped copy of the draft label is enclosed. Submit five copies of the corrected finished label.

If you have any questions please contact Joseph Tavano at (703) 305-6411.

Sincerely,

  
Richard Gebken  
Product Manager 10  
Insecticide Branch  
Registration Division(7505C)



# EcoPCO® AR/X

## Contact Insecticide

(LOGO)<sup>TM</sup>

**ACTIVE INGREDIENTS:**

2-Phenethyl Propionate, a botanical insecticide 1.00%

Pyrethrins, a botanical insecticide 0.40%

**OTHER INGREDIENTS\*:** 98.60%

100.00%

\*Contains petroleum distillates

**Kills:**

Ants, carpet beetles, carpenter ants, carpenter bees, centipedes, chocolate moths, clover mites, cockroaches, crickets, drug store beetles, earwigs, elm leaf beetles, fleas, millipedes, pillbugs, scorpions, silverfish, spiders, termites and trogodermas.

-Quick Knockdown

-Leaves No Visible Residue

-Controls ants for up to 4 weeks

-Controls Cockroaches for up to 4 weeks

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

MAR 1 2005

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
67425-15

**Unscented**

EPA Reg. No.: 67425-15

EPA Est. No.: 46813-CN-03

**CAUTION**

**KEEP OUT OF THE REACH OF CHILDREN**

**See Back panel for Statement of Practical Treatment.**

NET CONTENTS: 17 OZ.

EcoPCO® AR/X is a specifically formulated contact aerosol for the professional pest control operator for use in Homes, Offices, Hotels, Motels, Schools, Hospitals, Nursing homes, Day-care Centers, Factories, Warehouses, Stores, Supermarkets, Restaurants, Food Handling Establishments, Commercial or Institutional Kitchens, Food Processing Plants, Bottling Plants, and Transportation Equipment (Automobiles, Buses, Trucks, Trailers, Boats, Ships and Trains)

3/4

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

- **CAUTION:** Harmful if swallowed or inhaled. Causes moderate eye irritation. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling.
- **Food Areas of Food Handling Establishments:** Foods should be removed or covered during treatment. Either cover food processing equipment or wash/wipe away any excess.

**PHYSICAL and CHEMICAL HAZARDS**

**FLAMMABLE.** Contents Under Pressure. Do not use or store near heat or open flame Do not puncture or incinerate container. Exposure to temperatures above 130C may cause bursting.

**ENVIRONMENTAL HAZARDS**

- This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment wash water or rinsate.

**FIRST AID**

**IF SWALLOWED:** Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

**IF INHALED:** Remove person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

**IF ON SKIN OR CLOTHING:** Take off the contaminated clothing. Rinse the skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**HOT LINE NUMBER**

Have the 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 (InfoTrac Chemical Response System) for emergency medical treatment information

**NOTE TO PHYSICIAN**

Contains petroleum distillate – vomiting may cause aspiration pneumonia.

**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.**

***Crack/Crevice and Void Treatments: Important: Use the green injector nozzle tip provided.***

**Interior Treatments:** For crawling insects, 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

4/4

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.

**Grain Weevils, Flour Beetles, Chocolate Moths, Drugstore Beetles, Trogodermas, and Elm leaf Beetles:** Inject into cracks and crevices and/or voids where these insects may be harboring, such as but not limited to, cabinets, pantries, wall voids and in machinery. Repeat treatment as necessary.

**Food Handling Establishments: In food areas, application limited to crack/crevice treatment only.** Inject between different elements of construction, between equipment and floor, openings leading to voids and hollow spaces in walls, equipment legs and bases where insects hide. Avoid contact with food, utensils and food preparation equipment.

**Exterior Perimeter Treatments:** For crawling insects, apply to cracks/crevices where insects may enter premises or harbor. Areas to be treated include, but are not limited to, weep holes, under siding, wall voids, soffits, around attic vents, windows, doors and pipes. Treatment of infested fences and tree holes is permitted.

**Wood Destroying Insects (Localized Treatment):**

**Beetles, Borers, Carpenter Ants, Carpenter Bees, Termites and Wood Wasps:** locate suspected infestation and/or insect tunnels and cavities. Drill pilot holes 8 to 10 inches apart into insect tunnels, galleries and inaccessible closed voids. Inject 5 to 10 seconds per hole. Do not contact electrical wiring, plumbing, etc. when drilling. For carpenter bees, seal bee entrances after application. **Drywood Termites-** 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® AR/X will not stain carpet, floors or walls. Since it is impossible for the manufacturer to test all combinations of surfaces, fibers and coatings, good applications practices recommend that you test the spray in an inconspicuous area when treating a new fiber, paint or surface.

**Questions or Comments:** Call 1-888-326-7233 weekdays, 9:00 a.m. to 5:00 p.m. CST  
**Chemical Safety Information:** Call 1-800-535-5053 anytime (InfoTrac Chemical Response System)

VOC compliant in all states.

**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 may be disposed of on site or at an approved waste disposal facility.  
**Container Disposal:** Do not puncture or incinerate container. When container is empty, recycle if available. If recycling is not available, place the empty container in a trash collector.

**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.

(CFC Logo) (Steel Recycle Logo)

**www.ecopco.com**

© 2003 EcoSMART Technologies, Inc.  
318 Seaboard Lane, Suite 208  
Franklin, TN 37067  
All Rights Reserved

Made in the USA  
U.S. Patent No. 6,004,569  
U.S. and Foreign Pat. Pending  
CODE PCAXX17Z (USA)

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