

NOV 12 2008

Mr. Kevin Snyder
BUGS, etc. Inc.
5751 #3 Oleander Drive
Wilmington, NC 28403

Subject: Label Amendment
Product Name: FleaMaxx
EPA File Number: 68362-1
Application Dated: August 14, 2008
Decision: 391022

Dear Mr. Snyder:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

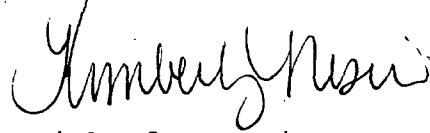
- On page one of your product label, revise your registration number to read EPA REG No. 68362-1.
- In addition, you have two guarantee statements on your label. Remove the following claim, "ONE YEAR GUARANTEE" from the front panel of your product label and revise the back panel warranty and to be consistent with the Agency's policy on Warranties and Disclaimers which can be found at the following site:
<http://www.epa.gov/pesticides/regulating/labels/pdf/warranty.pdf>. Final printed labeling should include a revised warranty statement based on one of the samples provided within the document entitled "Guidance on Warranty Statements" dated October 17, 2006.
- On Consistent with the pesticide container and containment regulations (see 40 CFR 156.140, 156.144, and 156.146), replace sentence "Do not reuse this container" under "Storage and Disposal" with the following language:
"Do not reuse or refill this container."

age Number 2

EPA Registration No. 68362-1

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

Sincerely,

A handwritten signature in cursive script that reads "Kimberly Nesci".

Kimberly Nesci
Product Manager 11
Insecticide Branch
Registration Division (7505P)

Enclosure: Stamped Copy of Label with Comments

MAXXIMUM

FLEA CONTROL FORMULA

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 12 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
68362-1

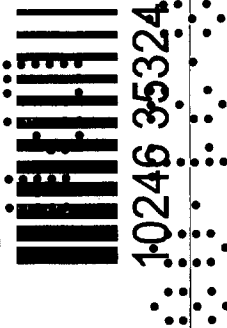


- ONE EASY APPLICATION
- ONE YEAR GUARANTEE!
- TREATS UP TO 2000 SQUARE FEET



KEEP OUT OF REACH OF CHILDREN
CAUTION
 SEE BOOKLET FOR ADDITIONAL PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:	
Orthoboric Acid.....	65%
OTHER INGREDIENTS	35%
TOTAL	100%
EPA Reg No.068362	EPA EST.068362-NC-001



Net Weight 4LB.

DIRECTIONS FOR USE

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

Use RESTRICTIONS:

Children and pets should not be in treatment area until after application is completed. Do not treat pets with this product. Avoid contamination of feed and foodstuffs. Avoid contamination of ornamental plants.

PRIOR TO APPLICATION

If carpets need to be cleaned, do so before application. Carpets must be completely dry before application. Before treatment thoroughly vacuum all carpets. Fish tanks and animal cages should be covered during treatments.

DIRECTIONS FOR APPLICATION

Apply directly on all carpet areas concentrating on areas where pets frequently traffic or sleep. Treat closets, area rugs, and under furniture that does not sit flush on the floor. Apply at a rate of 1lb per 500 square feet (6.3 mg/sq.in), brush powder into carpet fibers with broom or rug rake. Visible product remaining after application must be brushed into fibers by further grooming or remove by vacuuming. Do not apply to exposed fabric. Resume normal vacuuming after three (3) days. Allow four (4) to six (6) weeks for maximum flea control. NOTE: If high adult flea population exists or develops after treatment you may apply a pesticide designed to kill adult fleas.

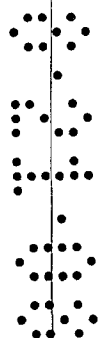
Storage and Disposal

Pesticide Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If empty: Do not reuse this container. 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.

Never place unused product down any indoor or outdoor drain.



PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals

CAUTION

Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

First Aid Statement

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- Move 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 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.

"Have the product container or label with you when calling a Poison Control or doctor or going for treatment". In case of emergency, for additional information call 888-521-4181 M-F, 9 to 5 p.m. After hours call Poison Center.

MAXX

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GUARANTEE

FleaMaxx will provide one year of continuous protection, you must first allow 8(eight) weeks of flea life cycle to be broken. If you are not completely satisfied that FleaMaxx has produced effective results, you may receive an additional canister by sending your name, address*, proof of purchase UPC label off canister, and original dated purchase receipt to:

Protechnology, INC.
5751 #3 Oleander Drive
Wilmington, NC 28403

NAME _____

ADDRESS* _____

CITY, STATE, ZIP _____

PLACE OF PURCHASE _____

TELEPHONE () _____

*Product ships UPS, No PO Box numbers allowed.