

MAR - 3 1997

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Kevin Kutcel
Bugless, Inc.
34208 Aurora Road #161
Cleveland, OH 44139

Dear Mr. Kutcel:

Subject: Revised Labeling
Bugg-Less
EPA Registration Number 68476-1
Submission Dated February 11, 1997

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:

1. On the right panel of the label, revise the statement "See Caution Statement on left panel." to read "See Precautionary Statements on the left panel."
2. Revise the Precautionary Statement to read:

"Harmful if swallowed. Causes eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling."

A stamped copy of the label is enclosed. Submit two copies of revised final printed labeling prior to releasing product for shipment.

If you have any questions or comments, please contact Melody Banks at (703) 305-5413.

Sincerely yours,

RPK

Richard P. Keigwin, Jr.
Product Manager IO
Insecticide-Rodenticide Branch
Registration Division

2-9-1-
PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND
DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling.

**STATEMENT OF PRACTICAL
TREATMENT**

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

IF INHALED: Remove patient to fresh air.

STORAGE AND DISPOSAL

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

STORAGE: Keep container tightly closed when not in use. Store in original container, in a dry place inaccessible to children and pets.

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 reuse container. Rinse 3 times, then offer for recycling or trash collection.

NOTICE

Manufacturer shall not be liable in respect to any injury or consequential damages suffered based on the use of this product contrary to the instructions given on this label.

BEST AVAILABLE COPY

BUGG-LESS™
An Insecticide For The Control
Of Fleas, Cockroaches, Ants,
Waterbugs and Silverfish

Manufactured by:
Bugless Inc.™
34208 Aurora Road #161
Cleveland, OH 44139

ACTIVE INGREDIENT:

Orthoboric Acid.....	66%
INERT INGREDIENTS.....	34%
Total	100%

**KEEP OUT OF THE REACH
OF CHILDREN**
CAUTION
See Side Panel For Additional
Precautionary Statements

ACCEPTED
with COMMENTS
in EPA Letter Dated

EPA Reg. No. 68476-1 MAR - 3 1987 Est. 68476-OH-001

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for a pesticide

1010/d/001 Net Contents: 2 lbs No.

68476-1

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 foodstuff. Avoid contamination of ornamental plants.

Application Directions

FLEAS: Carpets: Be sure to vacate entire area of children, infants and pets before application. Using the applicator container, apply Bugless to dry surfaces only. Apply directly to carpets where pets frequently traffic or sleep at the rate of one pound per 100 square feet (31.5 mg/sq. in). In other areas, you may apply at the rate of one pound per 600 sq. feet (5.25 mg/sq. in). Work powder deeply into fibers and mat with a broom or rug rake. Any powder visible after application **MUST** be brushed into carpet fibers or removed. See Caution Statement on left panel. **Upholstery:** Remove loose cushions. Apply along creases and into corners and furniture wells. Do not apply product to exposed fabric. Any product visible after application **MUST** be removed. See Precautionary Statements on left panel.

Cockroaches, Ants, Waterbugs, and Silverfish:

Edible Product Areas (exposure to food products): Create a barrier through which the insects must crawl. Apply liberally under and behind refrigerator, stove, sink, dishwasher and all other appliances. Apply a line from corner to corner in rear of kitchen cabinets or drill 1/2" at top of kick panels beneath cabinets in kitchen and bathrooms. dusting liberally. Apply into openings and void areas around plumbing, drains, water pipes and electrical conduits. Any product visible after application **MUST** be removed. See Precautionary Statements on left panel.

Non-Edible Product Areas When treating large areas, such as voids, soffits and sub-cabinets voids, dust liberally. Dust into pits of dumbwaiters, elevator shafts and trash chutes. In storerooms, dust under pallets and behind boxes.