

23 FEB 1996

Mr. Kevin R. Kutcel, Consultant  
Bugless Incorporated  
34208 Aurora Road #161  
Cleveland, Ohio 44139

Dear Mr. Kutcel

Subject: Amendment Reducing the Active/Inert Ingredient  
and Final Printed Label  
Registration Number: 68476-2  
Application Dates: November 6, 1995

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.

Revise the Precautionary Statement to read:

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

Revise the Statement of Practical Treatment to read:

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 eyes with plenty of water. Call a  
physician if irritation persists.

If on Skin: Wash with plenty of soap and water. Get medical  
attention.

**BEST AVAILABLE COPY**

We have also reviewed the Confidential Statement of Formula (CSF) proposing a new basic formulation. We have no objection to this proposed formulation. Acceptance of this formulation makes the previous formula dated November 19, 1994 obsolete. The new formula dated November 6, 1995 will become your basic formulation. We have amended our files to include this new formulation as the basic formulation for this product.

Please clarify to the Agency the primary name and the alternate brand name for this referenced product.

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

Sincerely,

**RPK**  
Richard P. Keigwin Jr.  
Product Manager 10  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

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

**CAUTION**

Harmful if swallowed. Avoid contact with eyes. Wash thoroughly after handling. Avoid contamination of food and feed. Do not leave container or product where infants, children or animals may gain access.

**STATEMENT OF PRACTICAL  
TREATMENT**

**IF SWALLOWED:** Immediately contact Poison Control Center or physician. If these are unavailable, give patient 1 or 2 glasses of water and induce vomiting by touching the back of throat with fingers. Never give anything by mouth or induce vomiting if patient is unconscious.

**IF IN EYES,** flush with plenty of water. Get medical attention if irritation persists.

**IF ON SKIN,** remove contaminated clothing and wash skin with soap and water.

**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.

**FLEALESS™**

**An Insecticide For The  
Control Of Fleas**

**Manufactured by:  
Bugless Inc.™  
34208 Aurora Road #161  
Cleveland, Ohio 44139  
Emergency Phone: (216) 292-1005**

**Active Ingredient:**  
Boric Acid.....66%  
Inert Ingredient.....34%

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

EPA Reg. No. 68476-2 EPA Est. 68476-OH-001

**Net Contents: 5 lbs (2.26 Kg.)**

**BEST AVAILABLE COPY**

**DIRECTIONS**

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

**Use Restrictions:** Do not use in treatment areas until treatment is completed. Do not use in areas where children or animals may be present. Avoid contamination of food and feed. Avoid contamination of water.

**Application**

**Carpets:** Be sure to vacuum thoroughly before and after application. Do not use in areas where children, infants or pets frequent. Use the applicator to apply powder to dry surfaces of carpets where pets frequent. Apply 1/2 to 1 pound per 100 sq. ft. (100 sq. ft. of one pound per 100 sq. ft. in). In other areas, apply 1/4 to 1/2 pound per 100 sq. ft. Work powder down with broom or rug rake. Vacuum application MUST be done or removed. See side panel.

**Upholstery:** Reapply powder along creases and folds. Do not apply in areas where children or pets frequent. Any product visible must be removed. See side panel.

Under  
Fungicide  
as anti  
register