

73079-2

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 20 2009

Cisse W. Spragins, Ph.D
Rockwell Labs Ltd
1512 Taney Street
North Kansas City, MO 64116

Dear Dr. Spragins:

Subject: Response to Rockwell Labs Rebuttal Dated April 13, 2009
Label Amendment/Alternate Formulation
InTice Granular Bait
EPA Registration Number: 73079-2
Application Dated: December 9, 2009
Decision: 403872 and 409818

The Agency has reconsidered your request to maintain the following marketing claim: "Weather/Moisture Resistant Bait" on your product labeling. This letter supersedes the Agency letter dated April 30, 2009. A copy of this letter has been placed in the file for this product.

The labeling referred to above, submitted in connection with registration under the Federal insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the label is enclosed.

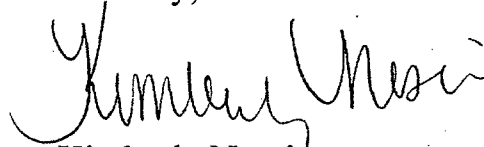
The Revised Alternate Confidential Statement of Formula dated November 25, 2008 referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A copy of this review has been placed in your file.

age No. 2

EPA REG. NO. 73079-2

If you have any questions, please contact Melody Banks on 703 305-5413.

Sincerely,

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

Kimberly Nesci

Product Manager 11

Insecticide Branch

Registration Division 7507P

Enclosure: Copy of Stamped Approved Label

InTice™ Granular Bait

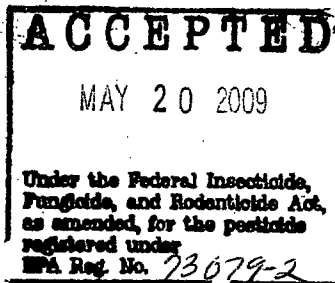
Kills Ants, Roaches, Crickets, Mole Crickets, Silverfish, Sowbugs, Pillbugs, Earwigs, Centipedes, Millipedes, Snails and Slugs

Weather/Moisture Resistant Bait

For Indoor and Outdoor Use

Ready-to-Use Bait

Active Ingredient: Orthoboric Acid.....5%
Other Ingredients:.....95%
Total:.....100%



EPA Reg. No.: 73079-2
EPA Est. No.: (as applicable)
Net Contents: 40 lbs

Manufactured by: Rockwell Labs Ltd (logo)
North Kansas City, MO 64116
Toll Free: 866 788 4101
www.rockwelllabs.com

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: **CAUTION:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

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 five minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

If on Skin: 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.

Have the product or label with you when calling a Poison Control Center or doctor or going for treatment. In case of emergency, for additional information call **800 858 7378**.

Environmental Hazards: Do not apply directly to water, 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.

DIRECTIONS FOR USE

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

Use Restrictions

In food areas of restaurants, residential, health care, educational, daycare, agricultural buildings, animal rearing and handling establishments, food handling and food processing establishments, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Sites and Species

Use Sites: In and around residential, multi-family, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, home greenhouses, transport vehicles, sewers, animal rearing and handling establishments and food handling and food processing establishments. Turf sites include lawns, ornamental turf, parks, playing fields, right-of-ways, and golf courses.

Listed Species: Ants: Odorous House, Argentine, Carpenter, Pavement, Little Black, Pharoah, Crazy, Acrobat, Rover, Big-Headed, White-Footed, Ghost, Cornfield, and Thief; **Roaches:** German, American, Brown-Banded, Smokey Brown, Brown, Asian, Wood and Oriental; **Cricketts:** House, Field, Camel, Ground, and Mole; **Others:** Silverfish, Earwigs, Sowbugs, Pillbugs, Centipedes, Millipedes, Snails, and Slugs.

Outdoor Perimeter Application: Apply bait at a rate of 4 lbs per 1000 square feet (6 oz or 1.25 cups per 100 square feet). Use a hand shaker, duster or mechanical spreader to apply the bait. Apply in a band from two up to four feet wide around the perimeter of buildings. Also apply around exterior light fixtures and along the edges of sidewalks, patios and driveways and under decks. Pay particular attention to potential insect harborage sites such as mulch beds, flowerbeds, compost heaps, wood piles, trees, stumps and trash areas and apply bait at the more liberal application rate in these areas. Pets may be attracted to this product. Do not pile the bait in exposed areas. The bait may also be sprinkled in and around rodent bait stations to control insects that harbor in these stations. When treating for ants, apply ½ to 1 oz of bait around ant mounds and sprinkle along foraging trails. For ants, including Carpenter ants, pay particular attention to harborage areas and apply bait around trees and stumps, in tree cavities, in and around firewood piles, around landscaping stones and in mulch beds. Ants can take the bait back to the nest and kill the colony. Bait may also be applied in insect bait stations. Reapply bait after one week if infestation is still present. To prevent large insect populations from developing around structures in warm months, a quarterly application around the perimeter and to harborage areas, as described above, at a rate of 1 lb per 1000 square feet is recommended. This treatment is particularly effective to help prevent the establishment of large colonies of pest ants. InTice Granular Bait may be used in combination with registered non-repellent insecticides (products containing the active ingredients imidacloprid or fipronil). If the perimeter is treated with a repellent insecticide (eg. pyrethroid), the bait may still be used around the perimeter, but it should be applied in a band outside the repellent barrier for best results. As a separate matter from the use of this product, as part of an IPM program, it is recommended that overhanging trees and other vegetation touching the structure be trimmed back, and cracks or gaps around pipes and window and door frames be sealed to minimize potential insect entry into buildings.

Sewer Application: Apply bait along ledges inside sewers and around manhole covers.

Snail and Slug Treatment: Apply bait at a rate of 6 oz per 100 square feet. Apply bait in areas likely to be infested, such as flower, fruit and vegetable gardens, on ornamental turf and ground cover vegetation, and around shrubs. In home greenhouses, apply bait on and under benches. Do not apply bait directly in flats or pots. Repeat treatment as needed, every 4-6 weeks.

Indoor Application: Apply bait only in areas inaccessible to children and pets, or in tamper-resistant bait stations. Apply bait at a rate of 6 oz (1.25 cups) per 100 square feet. Using a hand shaker or duster, apply bait in attics, crawl spaces, trash closets, utility closets, dropped ceilings, on dirt or gravel cellar floors, under and behind appliances and vending machines, in wall voids and voids under and behind cabinets, sinks and tubs, in drawer wells, garbage chutes, pipe chases, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen. Reapply bait after one week if infestation is still present. A power duster may be used to apply bait in appropriate areas, such as attics and crawlspaces. The duster manufacturer's recommendations for settings should be followed.

Application tips for certain sites follow:

1. In attics, be sure to get bait near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure. Attics should have proper ventilation to insure that no food odor from the bait seeps into the living area, particularly in hot weather. If in doubt, apply the product in a manner such that it can be easily removed.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and bait dusted into drawer wells. No bait should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but bait shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with bait. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary. As a separate matter from the use of this product, it is advisable to fix any leaks to minimize structural damage and odors, and to prevent potential chronic insect problems.

To help prevent insect problems from developing in homes and similar structures, a preventative program is recommended. Once per year, apply bait in attics and crawlspaces at a rate of 8 oz per 1000 square feet.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: Follow instructions for other sites as appropriate. **In food areas, only apply bait in cracks, crevices, and other inaccessible areas.** Avoid contamination of food and feedstuffs. Never apply bait directly to a surface where food is stored, prepared or served. Any bait that is left visible after treatment should be swept into cracks and crevices or removed.

Turf Application: Apply bait evenly over the affected area using a hand shaker or mechanical spreader at a rate of 2 lbs per 1000 square feet or 90 lbs per acre. The product should not be watered in. For mole cricket treatments, results will be best if the area is irrigated prior to bait treatment. Mole crickets typically come to the surface to feed in the evening.

Storage and Disposal

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

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

For 40 lb carton and 5 lb bag:

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** which is managed as a public-private partnership.

For 20 lb pail, 5 lb pail, 4 lb spreader jug, 1 lb shaker bottle, 1.2 lb puffer bottle:

This storage/application container may be refilled by the end-user of the product. Refill only with InTice Granular Bait.

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** which is managed as a public-private partnership.

Warranty Limitations and Disclaimer

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. Manufacturer shall not be liable for any consequential damages based on the use of the product.