

73079-6

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

APR 30 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Dear Dr. Spragins:

Subject: Label Amendment
Green Zone Granular Bait
EPA Registration Number: 73079-6
Application Dated: December 2, 2008
Decision: 403709

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.

- The data provided do not support the claims against centipedes. You must remove this pest from your product labeling. Since centipedes are considered a public health pest, data is required. Therefore, if you elect to have centipedes on your product label you must cite and/or submit product performance data to the Agency for review and approval.
- Revise the claim All-Weather Bait "to read" Moisture Resistant Bait.

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

Sincerely,



Kimberly Nesci
Product Manager 11
Insecticide Branch
Registration Division 7507P

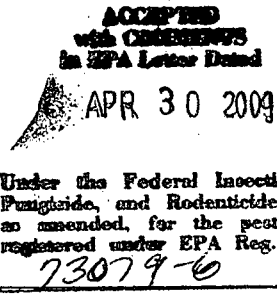
Enclosure: Copy of Product Performance Review
Stamped Approved Label "With Comments"

Green Zone™ Granular Bait

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

*Except Pharoah ants, Carpenter Ants, Fire ants, Harvester ants

**For Turf Application
Mold and Moisture Resistant
All-Weather Bait
Ready-to-Use Bait**



Active Ingredient: Orthoboric Acid.....10%
Other Ingredients:.....90%
Total:.....100%

EPA Reg. No.: 73079-6
EPA Est. No.: (as applicable)
Net Contents: 10 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 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.
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.

Application Directions

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, landscape beds, ornamental turf, parks, playing fields, right-of-ways, golf courses and home greenhouses.

Outdoor Application: Apply bait evenly over the affected area using a hand shaker or mechanical spreader at a rate of 1 lb per 1000 square feet or 45 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. Individual ant mounds may be treated by sprinkling 1/2 oz of product around each mound. Repeat treatment as needed. For snails and slugs, apply bait early in the season in areas likely to be infested, such as flower, fruit and vegetable gardens, on ornamental turf and ground cover vegetation, and around shrubs. Repeat monthly for satisfactory control. In home greenhouses, apply bait at a rate of 3 oz per 100 sq ft on and under benches. Do not apply bait directly in flats or pots.

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

Indoor Application: Apply bait only in areas inaccessible to children and pets, or in tamper-resistant bait stations. Apply bait at a rate of 3 oz (2/3 cup) 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.

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.

Disposal: If empty: Non-refillable container. 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.

Conditions of Warranty and Limitations of Liability

IMPORTANT: READ BEFORE USE Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability. **CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Manufacturer. All such risks shall be assumed by the user or buyer. **DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, Manufacturer makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Manufacturer is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Manufacturer disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product. **LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Manufacturer's election, the replacement of product.