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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Dr. Cisse Spragins  
Rockwell Labs Ltd.  
1512 Taney St.  
North Kansas City, MO 64116

DEC 17 2008

Dear Dr. Spragins:

**Subject:** Labeling Amendment; Addition of Mandatory Statement  
InVict Cockroach Gel  
EPA Registration No. 73079-10  
Submission Date: December 17, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. The following comment applies:

1. Should you wish to retain the company's website on your label, then please be aware that the language presented in the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to the false and misleading provisions of 40 CFR 156.10(a)(5). Therefore should the Agency find or if it is brought to our attention that a website contains claims substantially differing from the EPA approved section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact me at (703) 306-0415.

Sincerely yours,

Kable Bo Davis  
Entomologist  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure- Stamped Labeling

**InVict™ Cockroach Gel**

**Kills German Roaches**

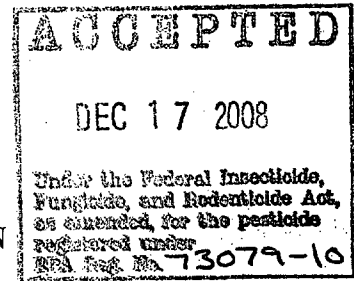
**For Indoor and Outdoor Use**

**Ready-to-Use Bait**

Active Ingredient: Imidacloprid.....2.15%  
Other Ingredients:.....97.85%  
Total:.....100.00%

EPA Reg. No.: 73079-10  
EPA Est. No.: (as applicable)  
Net Contents: 5 x 35 g (1.25 oz)

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



Stop - Read Label Before Use  
**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

**PRECAUTIONARY STATEMENTS** Hazards to Humans and Domestic Animals:  
**CAUTION:** Causes slight skin and eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after use and before eating, drinking, chewing gum, using tobacco or using the toilet.

**DIRECTIONS FOR USE**

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

**Use Sites:** In and around structures, including, but not limited to, residential, multi-family, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, transport vehicles, sewers, animal rearing and handling establishments and food handling and food processing establishments.

**Indoor Use:** Results will be best if spilled food and other debris are cleaned up before applying bait. Apply bait in small spots about 1/4" in diameter. Bait can also be applied in thin lines if appropriate. For most infestations, applications should range from 10 to 20 spots per 100 square feet. Use the higher number of spots when infestations are heavy and/or when roaches are living primarily in walls voids or other inaccessible areas. Smaller, more frequent spots are better than occasional large spots.

Look for areas, particularly cracks and crevices, where roaches may hide or enter buildings. Some of these areas include areas where baseboards are peeling away from the wall, cracks in and around equipment and appliances such as stoves, sinks, dishwashers, refrigerators and walk-in coolers, hollow table legs, areas where pipes come through walls, cracks between different construction elements, around electrical boxes,

cracks around hinges, where cabinets meet walls and cracks leading into wall, ceiling or floor voids. Pay particular attention to cracks which lead into void areas, even small ones. Also specifically look for warm, moist areas. Around and under dishwashers, refrigerators, ice machines, sinks, tubs and toilets and around drain openings are particularly attractive areas for roaches. Insert the syringe tip directly into the crack and apply about 0.5g (pea size) amount of bait.

Do not apply bait to areas that are washed down frequently, such as in cracks around the edges of food prep surfaces. Do not apply bait in areas where there is a risk of electrical shock. Be careful not to apply bait on hot surfaces or other areas where the temperature may exceed 130 °F as the bait could melt and drip. Bait placements should be in concealed, not open areas. Do not spray insecticides or other chemicals over bait placements, as this may cause roaches not to eat the bait. Apply bait out of reach of children and pets. Inspect bait placements periodically and reapply bait as needed. Ongoing monitoring is recommended as part of an Integrated Pest Management program.

**Food Processing and Handling Establishments, Including Federally-Inspected Food Plants:** In food areas, including serving areas while the establishment is in operation, only apply bait in cracks, crevices, and other inaccessible areas, or in tamper-resistant bait stations. Follow above directions for crack and crevice placement. 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 must be washed up.

**Outdoor Use:** Apply bait on the outside surfaces of buildings and other structures, as well as in crawlspaces, attics and other voids. Porches, garages, sheds, AC units and other outbuildings, fences or walls may also need treatment. Pay particular attention to cracks where roaches may enter buildings and treat those areas. These areas include but aren't limited to cracks around windows, doors, eaves and soffits, expansion joints, and areas where lines or pipes enter buildings. Under siding and molding are also attractive areas for insects to hide. Apply bait in spots or lines as indicated for indoor baiting.

**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.

**Warranty Limitations and Disclaimer**

To the extent consistent with applicable law, 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. To the extent consistent with applicable law, 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.

(Individual Syringe Label)

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See outer package for **Directions for Use and Storage and Disposal.**