

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 7, 2018

Cisse W. Spragins CEO Rockwell Labs Ltd 1257 Bedford Ave N. Kansas City, MO 64116

Subject: Notification per PRN 98-10 – adding new pack sizes, company logos, marketing

claims, and additional source for technical Product Name: InVict Cockroach Gel EPA Registration Number: 73079-10

Application Date: 4/9/2018 Decision Number: 540358

Dear Ms. Spragins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records. The CSF submitted with your application has been stamped "Notification" and will be placed in our files.

Please note that the record for this product currently contains the following CSF:

Basic CSF dated 04/9/2018

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 73079-10 Decision No. 540358

If you have any questions, you may contact Marianne Lewis at (703) 308-8043 or via email at lewis.marianne@epa.gov.

Sincerely,

Venus Eagle, Product Manager 01 Invertebrate & Vertebrate Branch 3

Registration Division (7505P)

Office of Pesticide Programs

#### NOTIFICATION

NOTE:

**Bold italicized text is information for the reader and not part of the label.**[Bracketed information is optional text.] Text separated by / denotes and / or options.

InVict<sup>TM</sup> Cockroach Gel ABN: InVict<sup>TM</sup> Gold Cockroach Gel 73079-10

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

08/07/2018

#### Kills German Roaches

(1.06 oz), 4 x 30g (1.06 oz), 35g (1.25 oz), 4 x 35g (1.25 oz), 5 x 35 g (1.25 oz), 60g (2.12 oz) 300g (10.6

oz) [Syringe / Tube]

Manufactured by: Rockwell Labs Ltd [logo]

1257 Bedford Ave

North Kansas City, MO 64116

[Tel: 816 283 3167] [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 elothing. 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, multifamily, 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 ¼" 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.

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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.

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## **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.

### Optional Marketing Claims/Logos

For Indoor and Outdoor Use
Ready to Use [Bait]
Syringe Tip / Pinpoint Applicator / [for] Precise Application
Easy to Use [Bait]
No Sprays / No Traps / No More Roaches
Apply Where Roaches Hide





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Individual Syringe Label

InVict<sup>TM</sup> Cockroach Gel

Kills German Roaches

For Indoor and Outdoor Use

#### Ready-to-Use Bait

Active Ingredient: Imidacloprid2.15%	EPA Reg. No.: 73079-10
Other Ingredients:97.85%	EPA Est. No.: (as applicable)
Total:100.00%	Net Contents: 30g (1.06 oz), 35g
	(1.25 oz)

Manufactured by: Rockwell Labs Ltd [logo]

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