

73079-11

5/19/2011

lofb



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

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

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

MAY 19 2011

Dear Dr. Spragins:

Subject: Efficacy data review, labeling amendment and revised basic CSF  
Abamectin Cockroach Gel  
EPA Registration No. 73079-11  
Submission Dates: January 1, 2011

Upon review of the submitted efficacy data, the inclusion of the Pharoah ant and the American cockroach on the label is acceptable. See the attached efficacy review dated 5/2/11 on MRID Nos. 48347501 and 48347502 for more information.

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 is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. The revised basic Confidential Statement of Formula dated May 8, 2011 is acceptable and will replace all previously submitted Confidential Statements of Formula for the basic formulation.

Should you wish to add a reference to the company's website on your label, 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 Assurance.

If you have any questions regarding this label, please contact Jennifer Urbanski at (703) 347-0156 or [urbanski.jennifer@epa.gov](mailto:urbanski.jennifer@epa.gov).

Sincerely yours,

A handwritten signature in black ink that reads "Venus Eagle". The signature is fluid and cursive, with a long horizontal line extending to the right.

Venus Eagle  
Product Manager (01)  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure- Stamped Label and Review (DP386578)

**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.

**Abamectin Cockroach Gel (ABN: InVict AB Insect Paste)**

Active Ingredient: Abamectin B1.....0.05%  
Other Ingredients:.....99.95%  
Total:.....100.00%

EPA Reg. No.: 73079-11  
EPA Est. No.: (as applicable)

Net Wt: X - Y g (Z oz) syringe(s)

Manufactured by: Rockwell Labs Ltd (logo)  
North Kansas City, MO 64116  
[Questions, Comments or Medical Information?

Call

Web

[© XXXX]

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**PRECAUTIONARY STATEMENTS**

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate 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.

[NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.]

**ENVIRONMENTAL HAZARDS**

To protect the environment, do not allow bait to enter or run off into storm drains, drainage ditches, gutters or surface waters.

**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.
- 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**.

**ACCEPTED  
MAY 19 2011  
Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, as amended, for the  
pesticide registered under:**

EPA. Reg. No: 73079-11

**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.

**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, homes, apartments, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, transport vehicles, sewers, animal research facilities, and food service, storage, handling and processing establishments.

**INDOOR USE**

Results will be best if spilled food and other debris are cleaned up before applying bait. Apply bait so it is out of reach of children and pets. Apply bait only in cracks, crevices, voids, other inaccessible areas, and non-exposed surfaces such as the undersides of furniture and fixtures and under or behind appliances. If bait contacts exposed surfaces, remove bait and wash exposed surfaces. Do not contaminate food or feed. 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. Do not apply bait on hot surfaces or other areas where the temperature may exceed 130 °F as the bait could melt and drip.

**Roaches:** Apply bait in small spots about ¼” (pea-sized) in diameter (about 0.5g). For most roach infestations, apply 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. Bait may also be applied in tamper-resistant bait stations. Apply about 1 gram (3/8” size spot) in each station. Place 1-3 stations per 100 square feet in out of the way places where roaches may hide.

Look for areas where roaches may hide or enter buildings. Some of these areas include areas where baseboards are peeling away from walls, cracks in and around equipment and appliances such as stoves, sinks, dishwashers, refrigerators, ice machines, and walk-in coolers, tubs, toilets, drain openings, 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. Inspect bait every 2-4 weeks and reapply when bait is almost entirely consumed.

**Silverfish:** Apply in 0.5g (pea size) spots as for roaches. Apply 5-10 spots per 100 square feet. Bait areas where silverfish are seen, such as bathrooms, around bookcases, stacks of papers, or peeling wallpaper and to cracks between the living space and the attic, such as around light fixtures. Inspect bait after 2-4 weeks and reapply if bait is almost entirely consumed.

40x6

**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.

**Ants:** Apply bait in thin (1/4" wide) lines, about 1" long in areas where ants are seen trailing. Use 2-5 lines per 100 square feet. Bait is most effective when placed as close as possible to ant nests. Bait may also be applied in tamper-resistant stations. Apply 1-2 lines per station (as above) and use 1-3 stations per 100 sq ft. Inspect bait weekly and reapply when bait is almost entirely consumed.

**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. Never apply bait directly to a surface where food is stored, prepared or served. Follow above directions for crack and crevice placement.

**OUTDOOR USE**

**Roaches, Ants and Silverfish:** Apply bait so it is out of reach of children and pets. Apply bait only in cracks, crevices, voids, holes, other inaccessible areas, and other non-exposed surfaces. Apply bait in concealed areas on the outside surfaces of buildings and other structures, as well as in crawlspaces, attics, tree holes and other voids. Porches, garages, sheds, AC units and other outbuildings, fences or walls may also need treatment. Pay particular attention to cracks where insects 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. Bait may also be applied in tamper-resistant bait stations. Inspect bait every 2-4 weeks and reapply when bait is almost entirely consumed.

**STORAGE AND DISPOSAL**

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

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

**Container Handling and 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** for disposal instructions.

**[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. To the extent consistent with applicable law, manufacturer shall not be liable for any consequential damages based on the use of the product.]

**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.

***Individual Syringe Label***

**Abamectin Cockroach Gel (ABN: InVict AB Insect Paste)**

Active Ingredient: Abamectin B1....0.05%  
Other Ingredients:.....99.95%  
Total:.....100.00%

EPA Reg. No.: 73079-11  
EPA Est. No.: 73079-MO-1  
Net Contents: X g (X oz)

[Questions, Comments or Medical Information?

Call \_\_\_\_\_

Web \_\_\_\_\_]

[© XXXX]

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See outer package for additional Precautions and First Aid, and complete Directions for Use.

**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.

**MARKETING CLAIMS**

**GENERAL CLAIMS**

- [Derived from Soil Microbes]
- [Contains Abamectin]
- [Contains no peanut products]
- [For Indoor and Outdoor Use]
- [For Indoor Use]
- [For Outdoor Use]
- [Ready-to-Use Bait]
- [Multiple [food] attractants]
- [Contains sweet / sugar, oil / grease, and protein]
- [Very low odor [formula]]
- [Guaranteed to work or your money back]
- [Made in [the] USA]

**ROACH AND SILVERFISH CLAIMS**

- [Kills Roaches]
- [Kills Small and Large Roaches]
- [Kills Large Roaches]
- [Kills Silverfish]

**ANT CLAIMS**

- [Kills Common / Household Ants Listed]
- Kills acrobat, allegheny, argentine, big-headed, cornfield, crazy, ghost, little black, odorous house, pavement, pharaoh, pyramid, thief and white-footed ants
- [Kills listed sweet / sugar and grease / protein eating ants]
- [Kills listed sweet, grease, and protein eating ants]
- [Uses 4 food sources to kill listed ants]
- [Kills the queen]
- [Kills the colony]
- [Kills the queen and the colony]
- [Kills the listed ants you see and the ones you don't]
- [Kills listed ants where they hide / breed]
- [Attracts listed [foraging / scout / worker] ants]
- [Starts working immediately]
- [Starts killing worker ants in 24 hours]
- [Kills the ant nest / colony in 3-7 days]
- [Guaranteed to kill the colony or your money back]