

73079-12

07-29-2011

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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

EPA Reg. Number:
73079-12

Date of Issuance:
JUL 28 2011

Term of Issuance:
Unconditional

Name of Pesticide Product:
SiliCide™

NOTICE OF PESTICIDE:

- Registration
- Reregistration

(Under FIFRA as amended)

Name and Address of Registrant (include ZIP Code):

Rockwell Labs Ltd
1512 Taney Street
North Kansas City, MO 64116

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is **unconditionally** registered in accordance with FIFRA sec. 3(c)(5). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3).

1. You will make the following label changes before you release the product for shipment:

- a) Revise the EPA Registration Number to read "EPA Reg. No. 73079-12."
- b) Revise Precautionary Statements to read as follows:

"Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet"

- c) The acute toxicity profile for this product is as follows:

Acute oral toxicity	IV
Acute dermal toxicity	IV
Acute inhalation toxicity	IV
Primary eye irritation	III
Primary skin irritation	IV
Dermal sensitization	Negative

Signature of Approving Official:

Richard Gebken
Richard Gebken Product Manager
Insecticide Branch/Registration Division (7505P)

Date:

July 28, 2011

Enclosure

Based on the acute inhalation and dermal toxicities profile (category IV), you may delete the "If Inhaled" and "If on Skin" from the First Aid statements. If you leave the "If Inhaled" first aid statement on the label, revise the statement to read as follows: Move person to fresh air; If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible; Call a poison control center or doctor for further treatment advice. Add the heading "First Aid" about the first aid statement.

- d) Replace the bed bug application rate "one pound/1000 square feet" with "20 oz/1000 square feet" base on the 2 oz/100 square feet rate. The liquid application rate appearing at the end of the label is too high for bed bug control at one pound per 250 square feet. Revise the liquid application rate to 5 oz per 250 square feet.
 - e) Add bed bug application directions under the *Directions for Use* section of the label. The directions must include applications to bed frames along with crack and crevice/spot treatments in sleeping areas. Fully described wall voids application. State whether or not the product can be applied to mattresses, box springs, carpets, bedding, and/or upholstered furniture. Add the prohibition "Do not treat toys and stuffed animals with product". You must also state what application equipment should be used to make bed bug applications.
 - f) Revise all instances of the word "Bedbugs" to read "bed bugs" because bed bugs are "true bugs" in entomological terms.
 - g) Under *Use Restrictions* delete "For prolonged exposure, use a NIOSH-approved dust mask respirator with an N, P, R, HE filter". Statements suggesting the use of a respirator are limited to restricted use pesticide products.
 - h) Delete the claim "Kills Pyrethroid-Resistant Bedbugs"
2. Generate and submit the results of an one year storage stability (830.6317) and corrosion characteristics (830.6320) study with the required observations made at 0, 3, 6, 9, and 12 months intervals, to the Agency on completion.
 3. Please submit three (3) copies of your final printed labeling before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at www.alexander.bewanda@epa.gov or (703) 305-7460.

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DIRECTIONS FOR USE

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

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, 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.

Avoid inhalation of dust. For prolonged exposure, use a NIOSH-approved dust mask respirator with an N, P, R, HE filter.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages, transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: SiliCide™ is a desiccant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application: Apply at a rate of 2 ounces per 100 square feet, or 1 lb per 1000 square feet in attics and crawlspaces. Using a bellows or other appropriate duster, apply a light, visible film in attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, 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.

Application tips for certain use sites follow:

1. In attics, be sure to get dust 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.
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 dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust 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 product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.

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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.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Pressurized application is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.

Liquid Application: SiliCide™ may be used as a spray, paint on application, or foam. Combine 1 lb of silica powder with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. Silica powder does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the SiliCide™/water slurry and inject directly into galleries and voids.

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

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

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