

73079-12

12/15/2011

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 15, 2011

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

Subject: Amendment: Response to September 15, 2011 Meeting and Agency's July 28, 2011  
Letter  
SiliCide™  
EPA Reg. No. 73079-12  
Your Submission Dated September 19, 2011

Dear Dr. Spragins:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

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

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander for".

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

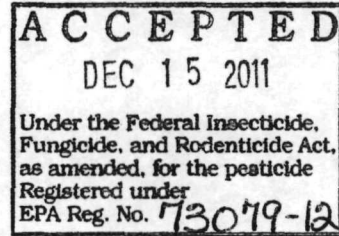
Enclosure

[Bracketed text] indicates optional text

### SiliCide™

**[Dust] For Control of:** Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

- [Kills Bed Bug Adults and Nymphs]
- [Kills Bed Bug Nymphs Hatched from Dusted Eggs]
- [Kills Pyrethroid-Resistant Bed Bugs]
- [Provides Fast Control]
- [Lasts Up to Ten Years When Undisturbed]
- [Odorless]
- [Non-Staining]



Active Ingredient: Amorphous Silica Gel.....100.0%  
 Total:.....100.0%

EPA Reg. No.: 73079-12      EPA Est. No.: (as applicable)

Net Contents: 2 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

## KEEP OUT OF REACH OF CHILDREN CAUTION

### PRECAUTIONARY STATEMENTS

**Hazards to Humans and Domestic Animals:** CAUTION: 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.

#### 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.

### 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.

[Bracketed text] indicates optional text

### 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 Rates and Methods:** Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

**General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment:** Treat 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, weep holes in brick or siding, 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.

[Bracketed text] indicates optional text

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.

**Bed Bug Treatment:** Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about 1/4 oz of dust to each accessible void.

**Flea, Lice and Tick Treatment:** Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

**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%.

**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.

[Bracketed text] indicates optional text

**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**

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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