FEB 2.8 2006

INNOVATIVE PEST CONTROL PRODUCTS P.O. Box 880216 Boca Raton FL 33488-0216

Dear Ms. Warkentien:

Subject: Label Revisions

EPA Registration No. 73766-1

Product Name: GOURMET ANT BAIT GEL

Application Date: October 25, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below:

- 1) Remove the "INHALED" language from the label, this product is a gel bait.
- 2) Revise the "PRECAUTIONARY STATEMENTS to read:

Harmful if swallowed, absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

- 3) Change "INERT INGREDIENTS" to "OTHER INGREDIENTS".
- 4) A company name and address of the registrants, the producer, or the person for whom the product was produced must appear on the pesticide label. The name and address must be displayed prominently and within the range of type size that is required for all label text. This can be placed anywhere on the label, but preferred on the front panel.
- 5) The ENVIRONMENTAL HAZARDS should read as follows:

"Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate".

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- 6) Within the "DIRECTIONS FOR USE" revise "food processing plants" to "non-food areas of food processing plants".
- 7) Under the **OPEN PLACEMENT METHOD NOT TO BE USED IN CALIFORNIA** section add the following: subheads in bold print.

Indoor: Use Gourmet Ant Bait for the control of ants or German Cockroaches, make
long thin lines.
exterior windows sills and in doorways to help prevent
been achieved.

- 8) Remove the claim language "destroying the colony".
- 9) Add "Do not contaminate feed or foodstuffs"."Place baits in areas inaccessible to children and pests", to the DIRECTIONS FOR USE section.

Enclosed is a copy of your stamped label "Accepted with Comments". Submit three (3) copies of your final printed labeling before you release this product for shipment.

To expedite handling, return a copy of this letter with your final printed labels. If you have any questions regarding this letter, contact Ms. Pat Quarles @ 703-305-6876.

Sincerely,

Richard Gebken Product Manager 10 Insecticide Branch

Registration Division 7505

enclosure

ACCEPTED with COMMENTS in EPA Letter Dated: FEB 2 8 7006

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Causes eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

CIDOT AID

FIRST AID	
If inhaled	-Move person to fresh airIf 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 advice.
If on skin or clothing	-Rinse skin with plenty of water for 15 to 20 minutesTake off contaminated clothingCall poison control center or doctor for additional treatment advice.
If in eyes	-Hold eye open and rinse slowly and gently with water for 15-20 minutesRemove contact lenses, if present, after the first 5 minutes, then continue rinsing eyeCall a poison control center or doctor for treatment advice.
If swallow ed	-Call poison control center or doctor immediately for treatment adviceHave person sip a glass of water if able to swallowDo not induce vomiting unless told to do so by the poison control center or doctorDo not give anything by mouth to an unconscious person.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-483-4997 for emergency medical treatment information.

No Mess - No Ants Use Indoors or Outdoors



GOURMET ANT BAIT GEL

Honevdew Formula with Uni-Tract II® UNI-TRACT II™ is an insect attractant variety of sweet and protein feeding ants.

Kills Sweet & Protein feeding ants and German Cockroaches

Active Ingredient:

Disodium Octaborate Tetrahydrate 6%

Inert Ingredients:

Total

100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Net Contents: 1.5 FLUID OZ. - (44.0) ml) or [3 FL Oz. (44.34 ml)]

MANUFACTURED BY: INNOVATIVE PEST CONTROL **PRODUCTS** Boca Raton, Florida 33488 USA EPA Reg. No. 73766-1 EPA Est. No. 81944-GA-001

ENVIRONMENTAL HAZARDS recticide.

Do not apply directly to water.

Freetride, and Rodenticide Act. as assessed, for the pesticide

DIRECTIONS FOR USEEPA Reg. No.

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

Gourmet Ant Bait Gel may be used in Ant Café or other similar bait stations. For use in and around homes, apartments, condominiums, schools, hospitals, restaurants, grocery stores, food processing plants, boats cruise ships, institutional and commercial buildings, nursing homes, hotels and warehouses.

OPEN PLACEMENT METHOD NOT TO BE USED IN CALIFORNIA

Use Gourmet Ant Bait Gel for the control of ants or German Cockroaches, Make long thin lines in areas where ants are a problem. Use 1-3 lines for each placement. Place baits where ants are trailing or have been seen. Place bait proven to enhance bait acceptance by a under food cabinets, sinks, stoves, refrigerators, food storage areas, attics, garages, basements, storage areas, closets, etc. Place on exterior window-sills and in doorways to help prevent entry of ants. Wash hands thoroughly before handling bait to remove any odors that may be repellent to ants, i.e. tobacco, garlic, strong chemicals/ cleaners etc. Remove as many competing food sources as practical. Ants are attracted to and will feed on Gourmet Ant Bait Gel until they die. The ants will return to their nests after consuming the bait and will feed their young and the gueen destroying the colony. Repeat placement of the bait until satisfactory control has been achieved.

> To use Ant Café bait station; open the lid, add Gourmet Ant Bait Gel until station is at least half full, close lid and place according to directions for use. See pictures for further information. Optional: (insert pictures filling of Ant Cafe)

> Do not use sprays, foggers or any strong chemicals or cleaners near the bait containers or placements. This may contaminate the bait and cause the insects to cease feeding.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal of this product. Storage: Store product in original container in a cool dry place out of reach of children. Do not allow product to freeze.

Disposal: If empty: 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. Never place unused product down any indoor or outdoor drain.

Do not contaminate feed or foodstuffs.

Place baits in areas inaccessible to children and pets

Notice: Buyer and user assume all the risk and liability of use, storage and/ or handling of this product not in accordance with terms of this label.