

73766-2

02/16/2007

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

FEB 16 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Innovative Pest Control Products
John O. Pearson, consultant
Compliance Services International
P.O. Box 880216
Boca Raton, FL 33488-0216

Dear Mr. Pearson,
Subject: Gourmet Liquid Ant Bait
EPA Reg. No. 73766-2
Submission dated 2/15/07

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

The Precautionary statements for eye irritation may be deleted in accordance with the toxicology review dated Dec 26, 2006. If you chose to retain them, they must 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 or using tobacco.

The Precautionary statements must include the following:

Caution

Hazards to Humans and Domestic Animals:

Applicators must wear long-sleeved shirt and long pants, socks, shoes and gloves.

Modify all ant claims as follows:

Kills the ant colony (except carpenter, fire and harvester ant colonies).

Kills common household ants (except carpenter, fire and harvester ants).

To control ants (except Carpenter, Fire and Harvester ants)...

Ants (except carpenter, fire and harvester ants) are attracted to and will feed...

The ants (except carpenter, fire and harvester ants) will return to their nests after consuming the bait and will feed their young and the queen destroying the colony (except carpenter, fire and harvester ant colonies).

The Environmental Hazards Statements must be revised as follows:

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

For containers over 5 gallons, the Environmental Hazards Statement must also contain the following statement:

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Revise claim about use of other chemicals to read:

Do not use sprays, foggers or any chemicals or cleaners...

Move the statement "Do not contaminate feed or foodstuffs" to the Directions for use, and revise it as follows:

Do not contaminate food, feed or foodstuffs.

Delete the graphic showing food being served as it contradicts the directions "do not contaminate food or foodstuffs."

The unit package label must be revised as follows:

The product name on the unit package must match the product name on the outer product package label.

Delete the statement "honeydew formula with unitract II as it is not supported by the confidential statement of formula on file for this registration.

On the unit package, revise the statement referring the user to the label as follows:

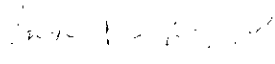
See accompanying package label for additional directions and precautions.

In the directions listing where the product may be placed, delete "etc." as this may lead to product misuse.

It has come to our attention that the confidential statement of formula (CSF) dated 3/8/2006 and approved February 14, 2007 was not signed by the registrant. You must submit a signed copy of this CSF within 30 days.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,


Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes eye irritation. Avoid contact with eyes. In case of contact immediately flush eyes with plenty of water. Get medical attention if irritation persists.

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 5 minutes, then continue rinsing eye. -Call a poison control center or doctor for treatment advice.
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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.

ENVIRONMENTAL HAZARDS

Do not apply directly to water.

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.

RECALL
GOURMET LIQUID ANT BAIT
EPA Reg. No. 73766-2
EPA Est. No. 81944-GA-001
41580-FL-001 or 81184-FL-001
FEB 16 2007
Date: 1/26/07
Innovative Pest Control Products
Boca Raton, Florida 33488 USA
EPA Reg. No. 73766-2
EPA Est. No. 81944-GA-001
41580-FL-001 or 81184-FL-001



GOURMET LIQUID ANT BAIT

Kills Common Household Ants including; Argentine, Carpenter, Fire Ants & Roaches

Active Ingredient:

Disodium Octaborate Tetrahydrate 1%

Inert Ingredients: 99%

Total 100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Net Contents: .75 (22.2ml), or 32 or 128 FLUID OZ. or 275 Gallons

MANUFACTURED BY:
INNOVATIVE PEST CONTROL PRODUCTS

PO Box 880216
Boca Raton, Florida 33488 USA
EPA Reg. No. 73766-2
EPA Est. No. 81944-GA-001 or
41580-FL-001 or 81184-FL-001

(Insert #) Ant & Roach Café RTU Prefilled Bait Stations

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

DIRECTIONS FOR USE

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

Place baits in areas inaccessible to children and pets.

To control ants and roaches use indoors or outdoors near homes, apartments, condominiums, schools, hospitals, restaurants, grocery stores, food processing plants, boats, cruise ships, institutional and commercial buildings, nursing homes, hotels and warehouses.

Gourmet Liquid Ant Bait may be used at full strength, diluted with distilled water or other food grade liquid 1:1 to make bait containing .5% active ingredient. Bait may be used in Ant Café, Ant & Roach Café RTU, KmAntPro or other similar bait stations.

[Optional Instructions: Ant & Roach Café RTU bait station Instructions: 1. To activate Ant & Roach Café RTU Bait Station, place station on a flat surface with the cone facing up. If cone is filled with liquid, move station from side to side rapidly and liquid will leave the cone. 2. With a knife or scissor cut the top of the cone, so that the top of the remaining cone is level with top of surrounding circular surface. 3. Place bait station according to label directions.]

Place the bait station on or near ant activity. Place stations under food cabinets, sinks, stoves, refrigerators, food storage areas, attics, garages, basements, storage areas, closets, etc. Place on exterior windowsills and in doorways to help prevent entry of ants. Some bait stations may be designed to be affixed to a wall, hung on pipes or branches, anchored in the ground or placed on a flat surface. When using bait stations, wash hands thoroughly before handling to remove any odors that may be repellent to ants, i.e. tobacco, garlic, strong chemicals/ cleaners etc.

OPEN PLACEMENT METHOD NOT TO BE USED IN CALIFORNIA!

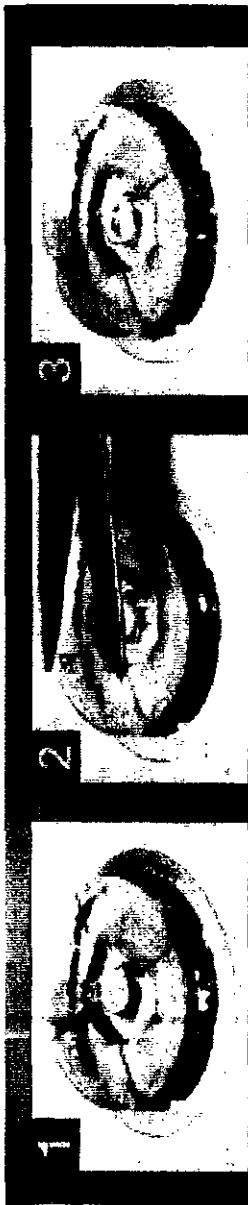
Gourmet Liquid ant Bait can be used to make small, pea sized placements and or long thin lines in areas where ants are a problem

Ants are attracted to and will feed on Gourmet Liquid Ant Bait until they die. The bait is designed to work slowly and sufficient bait should be made available for at least 14 days of continuous feeding. The ants will return to their nests after consuming the bait and will feed their young and the queen destroying the colony.

Repeat placement of the bait until satisfactory control has been achieved. 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.

(Optional: illustration of bait station activation)

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MANUFACTURED BY