

73766-2

6/19/2007

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JUN 19 2007

Mr. Alan S. Bernard, Chief Operating Officer  
Innovative Pest Control Products  
P.O. Box 880216  
Boca Raton, FL 33488-0216

**Subject:** Submission of an amendment dated May 12, 2007 to rebut the Agency's last stamped approved label dated May 7, 2007. This submission also includes a revised alternate CSF dated 7/26/2007.  
EPA Registration Number: 73766-2  
Product Name: Gourmet Liquid Ant Bait

Dear Mr. Bernard;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

Page 1:

1. The following revisions to the label are acceptable as follows:
  - a. Kills the Ant Colony(except Carpenter, Fire Ants, and Harvester Ants)<sup>1</sup>
  - b. "Kills Roaches & Common Household Ants, Including Argentine and Carpenter Ants" and "This product will not control Pharaoh, Harvester or Native or Red Imported Fire Ants."<sup>2</sup>
  - c. The Ingredient statement must be decimal aligned, and be identified as 1.00% and 99.00% accordingly.
  - d. An address must be provided for the company. A Post Office box is not adequate.<sup>3</sup>
  - e. The use of the term "Honeydew Formula" may be used provided it is qualified with the following statement: "Refers to the ability of certain aphids to produce sweet excrement as an ant attractant."

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<sup>1</sup> The qualifier "(except Carpenter, Fire Ants, and Harvester Ants)" is required. The exclusion of the specific species is the result of insufficient data to support these ant species which require efficacy data. Without this information, front panel marketing with the statement "Kills the Ant Colony" only, can be false and misleading to the purchaser.

<sup>2</sup> The statements must be presented together, and cannot be placed in separate locations on the label. Each statement must be presented on the label with the same font size, format, color, and orientation, so that neither statement detracts from the other.

<sup>3</sup> The company name and address of the registrant, the producer, or the person for whom the product was produced must appear on the pesticide product label See 156.10(c) .

- f. Within the Directions for Use, either remove the statement "This product will not control Pharaoh, Harvester or Red Imported Fire Ants." or revise according to 1.b. above.
- g. Within the paragraph describing the following, insert the statement shown in italics: "Bait may be used in Ant Café, Ant & Roach Café, RTU, KMAntPro or similar bait stations (*Sold Separately*)."
- h. Revise the following paragraph as indicated in italics:  
"Gourmet Liquid ant Bait can be used to make small, pea sized placements and or long thin lines in *inaccessible* areas where ants are a problem."
- i. Within the Directions for Use, Revise the second paragraph as follows:  
"*Listed* 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."
- j. The Warranty and Disclaimer statement should be revised in accordance with the Agency's Guidance on Warranty Statements issued October 17, 2006 (a copy is enclosed). This document may also be found at the following Agency internet site: <http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>
- k. Unit Package Label: Revise the Ingredient statement in accordance with section 1.c above.

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



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

Enclosures

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
JUN 19 2007

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

No Mess 73766-2

Use Indoors or Outdoors  
Kills the Ant Colony

## GOURMET LIQUID ANT BAIT

Kills Roaches & Common Household Ants  
Including Argentine and Carpenter Ants.

This product will not control Pharaoh, Harvester  
or Red Imported Fire Ants

### Active Ingredient:

Disodium Octaborate Tetrahydrate 1%

Inert Ingredients: 99%

Total 100%

## KEEP OUT OF REACH OF CHILDREN

Net Contents: .75 (22.2ml), 32 oz 1 Gallon, or  
2.5 Gallon

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

## PRECAUTIONARY STATEMENTS

### ENVIRONMENTAL HAZARDS

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  
wash water or rinsate.

## 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.

## DIRECTIONS FOR USE

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

Do not contaminate food, feed or foodstuffs

Place baits in areas inaccessible to children  
and pets.

This product will not control, Harvester or  
Red Imported Fire Ants.

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.

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 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. (Optional: illustrations of bait station  
activation)

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. 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, chemicals/ cleaners.

## 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 chemicals or cleaners near the  
bait containers or placements. This may contaminate the bait and  
cause the insects to cease feeding.

**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

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Gourmet Liquid Ant Bait  
Unit Package Label

Gourmet Liquid Ant Bait

**Active Ingredient:**

Disodium octaborate tetrahydrate .....	1%
<u>Other Ingredients .....</u>	<u>99%</u>
<b>Total</b>	<b>100%</b>

**KEEP OUT OF REACH OF CHILDREN**

Sold by: Innovative Pest Control Products  
EPA Reg. # 73766-2  
EPA Est. # 81184-FL-001

Contents: 0.75 fluid oz. (22.2ml)  
See accompanying package label for additional directions and precautions  
Lot #

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