

MAR 13 2002

Innovative Medical Services  
c/o Mr. Henry Jacoby  
6709 Ilex Court  
New Market, Maryland 21774

Subject: Label Amendment  
RoachX  
EPA File Number: 73912-3  
Application Dated: January 16&24, 2002

Dear Mr. Jacoby:

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

1. In accordance with PR Notice 2001-6, revise the Storage and Disposal Statement to read:

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 [toll free number which meets the criteria in paragraph II.E.] for disposal instructions. Never place unused product down any indoor or outdoor drain.

2. Under the sub-heading, "General Information", remove the statement on the eighth line that reads, "but are not limited to" from your product labeling.

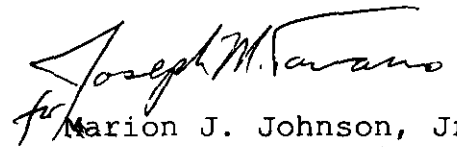
3. In addition, Under the sub-heading "Food/Feed/Handing....", on the thirteen line remove the statement that reads, "but are not limited to" from your product labeling.

A stamped copy of the label is enclosed. Submit three copies of revised final printed labeling prior to releasing product for shipment.

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If you have any questions regarding this matter, please contact Melody Banks on (703) 305-5413.

Sincerely,



for Marion J. Johnson, Jr.  
Product Manager 10  
Insecticide Branch  
Registration Division (7505c)

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
MAR 13 2002**

3/6

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

# ROACH X

73912-3

INSERT A

## ACTIVE INGREDIENT:

Boric Acid 35 %

## INACTIVE INGREDIENTS

65 %  
100 %

EPA File Symbol 73912-R  
Six 30-gram Tubes Per Box  
8 Boxes Per Case  
Total 48 Tubes

### CAUTION

#### KEEP OUT OF REACH OF CHILDREN

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

#### FIRST AID

If on skin or clothing	<ul style="list-style-type: none"> <li>•Take off contaminated clothing</li> <li>•Rinse skin immediately with plenty of water for 15 - 20 minutes</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>•Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>•Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>•Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>•Call a poison control center or doctor immediately for treatment advice.</li> <li>•Have person sip a glass of water if able to swallow.</li> <li>•Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>•Do not give anything by mouth to an unconscious person.</li> </ul>

#### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For more information, call 1-619-596-8700 from 9 a.m. to 5 p.m. PST Monday through Friday.

## DIRECTIONS FOR USE

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

1. Open both ends of bait station and place under sinks, behind stoves, refrigerators, washers and dryers.
2. Bait station may be tossed into dark recesses of attics and basements or other inaccessible locations around home or garage.
3. Locate area where pipes enter the home and place bait station near the opening.
4. Look for small cracks or crevices in walls or foundation and place a station in the general area.
5. At night, turn on light in areas where roaches are known to frequent. Locate the holes they scurry into and squeeze several small heads of paste into and around area.

### GENERAL INFORMATION

RoachX is intended for the control of cockroaches, including German, American, Smokey Brown, Oriental and other cockroach species, including Water Bugs and Silverfish. Apply as a spot and/or crack and crevice application to spaces within structures, their walls and ceilings (both inside and out), and the immediate adjacent surrounding grounds. Such structures include, **but are not limited to**, residential (e.g. houses, apartments), commercial, industrial, and institutional buildings (e.g. restaurants, supermarkets, offices, hospitals, motels and utilities), and agricultural structures (e.g. barns, livestock housing facilities), pet kennels, zoos, and on various modes of transport (e.g.

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aircraft, buses, trucks, trailers, rail cars, and marine vessels).

**SPOT OR CRACK AND CREVICE APPLICATIONS**

**Spot Treatments:** RoachX should be applied as spots or droplets of approximately 4 to 6 mm in diameter. Approximately 10 droplets per 100 sq. ft. are recommended for use under conditions with low to moderate insect infestations. Approximately 20 droplets per 100 sq. ft. are recommended for more severe infestations or where the population occurs in inaccessible locations, such as in wall voids. Under most circumstances, more numerous, smaller bait placements will provide faster and more effective control than fewer large placement.

**Crack and Crevice Treatments:** RoachX may also be applied as a bead or thin film where appropriate. Bait should be applied into cracks and crevices in which insects hide or through which they may enter the building. Such openings commonly occur at expansion joints, between different elements of construction, between, behind or under various types of equipment such as cabinets, refrigerators, sinks, stoves, dishwashers, and through floors, doors, windows, walls and ceilings. These openings may lead to voids such as hollow walls, hollow equipment legs and bases, utility entrances, electrical conduit, junction and switch boxes, and wall and floor drain exists. Trapping techniques or spot flushings will aid in deterring areas with insect activity.

Apply RoachX by placing the applicator tip directly into cracks and crevices and other openings or voids where insects may hide or harbor and deposit the bait as multiple spots or as a continuous bead. Care should be taken to avoid depositing the product onto open or exposed surfaces. During follow up visits, inspect bait placements and reapply as needed. If bait is completely consumed, reapply in the same location, as many insects (such as cockroach-s) leave behind secretions and droppings to attract other insects to harborages and food sources. Do not use this product where a possibility of a shock hazard exists

**FOOD/FEED/HANDLING ESTABLISHMENT APPLICATIONS**

Application within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment only. Apply with syringe applicator directly into cracks, crevices, holes and other small openings where roaches may be a problem.. Apply small amounts of RoachX paste (up to 1/2 gram) per spot. Do not apply bait to areas where food feed, food utensils or food processing surfaces may become contaminated. Do not apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food feed preparation and prepared food holding surfaces as bait may be removed by washing. Do not apply

bait to surfaces where the temperature exceeds 130F as bait may run. ~~Examples include, but are not limited to,~~ portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers and hot water pipes. Care should be taken to avoid depositing RoachX paste onto exposed surfaces. If RoachX paste contacts an exposed surface, remove RoachX paste and wash exposed surface. Food/feed areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas are also considered a food/feed area when food is exposed and facility is in operation. Apply bait small amounts between different elements of construction, between equipment and floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, behind and under refrigerator, cabinets, sinks, closets, stoves and other equipment where cockroaches hide. During follow-up visits inspect bait placements and reapply when necessary.

**Application of this product in food/feed areas of food/feed handling establishments other than, as a crack and crevice treatment is not permitted.**

**INDOOR PEST CONTROL**

For indoor uses, make applications in a manner as previously described above under "Spot or Crack and Crevice Applications." Particular attention should be given to treating entry points and harborage areas. Place the applicator tip into cracks, crevices, voids, holes, and other small openings where insects may hide. Apply small amounts of bait (up to 1/2 gram/spot) or as a bead or film at insect activity sites. Cleaning of all areas prior to use of RoachX will increase levels of control. Any foodstuffs infested with insect pests should be removed and destroyed. Applications to furniture should be restricted to those areas where contact to humans will not occur. Applications to textiles or fabrics may cause discoloration or staining

**OUTDOOR PEST CONTROL**

Apply RoachX bait stations or RoachX paste as crack and crevice treatment. Spot, bead or thin film outside surfaces of buildings, porches, patios, door and window openings, crawl spaces, air conditioning units, utility entrances through outside walls, under siding/molding, water drains, electrical boxes, in garages and other adjacent areas where pests may be active and may find nesting sites or harborage. Applications should be made to substrates adjacent to buildings, the building foundations, wall voids, attic and soffit vents, expansion joints, around doors and

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windows, soffit areas, eaves, under stairways, around screens, on fences, trees and other areas conducive to infestation. Do not apply RoachX to areas that have been recently sprayed with insecticides, and do not spray insecticides over RoachX paste, as it will cause the bait to become repellent.

#### STORAGE AND DISPOSAL

**Pesticide Storage:** Store in cool dry area inaccessible to children and pets.

**Pesticide disposal:** Securely wrap original container in several layers of newspaper and discard in trash.

**Container disposal:** Securely wrap original container in several layers of newspaper and discard in trash.

Mfg. by: Innovative Medical Services  
1725 Gillespie Way  
El Cajon, CA 92020

Phone: 619-596-6900  
Fax: 619-596-8700

[www.imspure.com](http://www.imspure.com)

INSERT A



SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

KEEP OUT OF REACH OF CHILDREN AND DOMESTIC ANIMALS

**CAUTION**

ACTIVE INGREDIENT		CONTENTS
Boric Acid	35%	1 Applicator Syringe
INACTIVE INGREDIENTS	65%	5 Bait Stations
TOTAL	100%	

EPA REG NO 73912-3