

U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

81824-9

EPA Reg. Number:

Date of Issuance:

FEB 16 2007

NOTICE OF PESTICIDE:

X Registration Reregistration (under FIFRA, as amended) Term of Issuance: Conditional

Name of Pesticide Product:

BORATHOR PLUS

Name and Address of Registrant (include ZIP Code):

Mr. Michael Kellogg Ensystex 11, Inc. c/o Pyxis Regulatory Consulting, Inc. 41 10 136th St. NW Gia Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.

(continued on page 2)

Signature of Approving Official:

See page 7

Date:

FEB 16 2007

Richard J. Gebken, Product Manager (10)

Insecticide Branch, Registration Division (7505P)

2. Make the following change to the label:

Note: Text marked with a strikeout should be removed, and text marked with italics should be inserted

- a. Change the product registration number to "EPA Reg. No. 81824-9"
- b. Page 1:
 - Revise the following statement:

"For both interior and exterior use in and around homes, apartments, garages, museums, public and private Institutions, schools, hotels, hospitals, kennels, stables, farm buildings, trucks, trailers, warehouses and non-food areas of supermarkets, restaurants and food processing plants.

- The Net Contents must be expressed as Fluid Ounces, since this is a liquid.
- Immediately below the paragraph entitled Personal Protective Equipment (PPE) and associated text, insert the following new section with the following text

"User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry."

- The Environmental Hazards language proposed is for containers of 5 gallons or less. If you produce, manufacture or distribute in containers larger than 5 gallons, you must propose alternative Environmental Hazards language.
- Within the DIRECTIONS FOR USE, directly below the statement "It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and understand the entire label before using. Use only according to label directions." Insert the following disclaimer statement directly below:

"BORATHOR PLUS is not intended as a substitute for mechanical alteration, soil treatment or foundation treatment. BORATHOR PLUS is not intended for application to soil. In areas where a soil treatment barrier termiticide treatment is required, BORATHOR PLUS may be applied as a supplemental pretreatment to protect wood from subterranean termites that may penetrate chemical gaps occurring in termiticide-treated soil. When active infestations exist, get a professional inspection."

 Under the disclaimer statement noted above, insert the next two (2) subsections and associated text:

"Use Restrictions

Do not use in edible product areas of food processing plants or on countertops and other surfaces where food is prepared. Do not use in serving areas where food is exposed. Do not contaminate feed, water or food. Do not enter or allow others to enter or occupy treated areas until spray has been absorbed into the wood. Treated areas must not be occupied during application.

Phytotoxicity

This product may be phytotoxic to plants. When treating around the exterior of structures cover and protect shrubbery and plants that may be potentially exposed to this product, when applied in accordance with the label directions."

Move the Storage and Disposal Statement to the end of the label.¹

c. Page 2:

Revise the following paragraph:

Other non wood destroying Organisms Controlled

"BORATHOR PLUS also controls Algae and general household pests such as cockroaches that come in contact with the treated surfaces."²

Revise the following paragraph:

"Using BORATHOR PLUS against Wood Infesting and Destroying Organisms

BORATHOR PLUS can be applied to and used to protect all types of wood and cellulose containing components, including but not limited to, lumber, logs, plywood and cellulose insulation, situated within the interior and/or on the exterior of structures, so long as they remain protected from moving moisture and are not in direct contact with the soil. BORATHOR PLUS will not adequately protect wood exposed to moving moisture such as liquid water dripping onto or moving across its surface such as rain or plumbing leaks."

Revise the following paragraph:

"In addition to treatment with BORATHOR PLUS, effective insect and fungi control may also include require mechanical alteration of the structure to stop moisture accumulation on or within the confines of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that may cause an increase in the moisture content of wooden structural components of the structure is advised. If possible, break contact between the ground and untreated wooden components of the structure. When untreated wooden components of the structure touch the ground and such contact cannot be broken, protect these components of the structure against termite attack using a termiticidal product labeled to provide such protection."

² The term "General household pests" is vague and misleading.

¹ Refer to Chapter 13 of the Label Review manual, and the sample labels that accompany the Label Review Manual.

Revise the following paragraph:

"BORATHOR PLUS can also be used to prevent the establishment of general household pests such as cockroaches within a structure. Borathor plus can also be used on the surface of wood in new construction or to wood surfaces inside wall void areas in existing structures to control cockroaches that come in direct contact with these treated areas."

Strike the following statement:

"BORATHOR PLUS may be tank-mixed with compatible non-residual pesticides for quicker knockdown of Carpenter ants and other insects, or with an approved fungicide for increased performance against mold."

d. Page 3:

Remove the following table from the label. The term "All Insects" is too broad and misleading, thus potentially leading to misuse of this product.

All Insects Water: BORATHOR PLUS Dilution Ratios	
Application Method	Remedial
Spray	1:1
Brush	1:1
Roller	1:1
Injection	1:1

e. Page 4:

• Revise the Foam Mixing Directions to add the following <u>additional</u> language within the paragraph:

"Apply foamed Borathor plus to void spaces at a 1:20 to 1:30 foam ratio (one (1) gallon of mixed solution expanded with foaming agent to produce 20 to 30 gallons of foam). Apply enough foam to fill void and contact all wood surfaces in the void space."

- Within the Application Directions section, revise the following sentence: "BORATHOR PLUS can be applied to non-wood (e.g. masonry) surfaces of structures to prevent the establishment in the structure of infestations of general household pests such as cockroaches. surfaces of wood in new construction or to wood surfaces inside wall void areas in existing structures to control cockroaches that come in direct contact with these treated areas." Target surfaces include interior masonry walls of crawl spaces and unfinished basements in addition to wood surfaces. BORATHOR PLUS can also be applied into wall voids in existing structures to control such pests.
- Remove the following sentences:

³ The cited "me-too" label does not contain Directions to apply as a general pest control product. In addition, the directions include application as a powder. This product is a liquid.

⁴ The cited product has not been approved for mold control. In addition, any tank mixing instructions must adhere to all of the requirements listed in PR Notice 82-1.

⁵ This language is consistent with the me-too cited product.

"BORATHOR PLUS can be used to protect structures against termite attack where it is critical that no movement the active ingredient occur after application, such as termite treatments to structures containing or near cisterns and wells. BORATHOR PLUS is not a soil termiticide. Do not use to directly treat soil unless otherwise directed."

Adult forms of insects (such as beetle adults) may emerge from the wood some period of time after treatment. The BORATHOR P!.US treatment will kill any young that hatch from any eggs they laid.⁷

Spraying water on some wood species can mobilize natural wood extractives, raise the grain and leave behind calcium or other deposits. Prior to treating large areas, treat a small area with BORATHOR PLUS solution to ensure satisfaction with the final appearance of the treated surface after it dries.

• Revise the "Mixing of Borathor Plus as a Foam" to add the following <u>additional</u> language within the paragraph:

"Apply foamed Borathor plus to void spaces at a 1:20 to 1:30 foam ratio (one (1) gallon of mixed solution expanded with foaming agent to produce 20 to 30 gallons of foam). Apply enough foam to fill void and contact all wood surfaces in the void space."

f. Page 5:

■ Within the section entitled "Preventative Whole Structure Wood Destroying Organism Treatment to Structures Under Construction"

Remove the following statement:

"Note: This treatment is applied to structures under construction and serves as a primary treatment for all wood infesting and destroying organisms controlled by BORATHOR PLUS including subterranean termites."

• Within the section entitled "Subterranean Termite Only Preventative Treatment to Structures Under Construction (Subterranean Termite Pretreatment)
Remove the following statement:

"Note: This treatment is applied to structures under construction and serves as a primary treatment for the control of subterranean termites."

• Within the section entitled "Subterranean Termite Only Treatment to Structures Containing Slabs" remove the following statement:

"Evenly treat the surface of dirt filled bath traps at a rate of sixteen ounces

⁶ Safety data has not been provided to the Agency to permit the use around cisterns and wells, thus this use has not been cleared by the Agency. In addition, the other statements have been moved to the disclaimer section at the front of the Directions for Use.

⁷ Adult wood boring beetles emerge, and may or may not lay eggs on untreated surfaces. Therefore this statement is not correct, since the eggs can hatch into larvae on untreated surfaces.

⁸ Delete the word natural.

⁹ This statement has not been approved by the Agency for any borate products. In addition, it is not in agreement with the Agency required disclaimer section that must be added to the label as discussed directly under the Directions for Use.

of solution per square foot of trap."10

6/14

g. Page 6:

Remove the following section, since it is a redundant and unnecessary.

"General Pest Application During Subterranean Termite PreTreatment Application

BORATHOR PLUS can also be applied to the exposed surface of accessible wooden and non-wooden (e.g. masonry) structural components to help control the establishment of general pest infestations such as cockroaches within the structure. This treatment can conveniently be applied at the same time as an application for the prevention of subterranean termites is being applied to the sub-structure. Refer to the Remedial and Preventative Application for General Pests section for more information.

Revise the following section:

"Remedial and Preventative Application for General Pests Control Applications

BORATHOR PLUS can be applied to the exposed surface of accessible wood and non-wood (e.g. masonry) structural components of structures under construction to prevent the establishment in the structure of infestations of general household pests such as cockroaches. The application of Bora-Care to the surface of wood in new construction or to wood surfaces inside wall void areas in existing structures helps to prevent the establishment of cockroaches that may come in direct contact with these treated areas. Mix and apply a 1 part Water: 1 part BORATHOR PLUS dilution and apply to the point of wetness. Apply one (1) gallon of BORATHOR PLUS solution per 400 square feet of surface area. to the exposed surface of wooden and non-wood (e.g. masonry) components of the structure such as interior crawlspace foundation and basement masonry walls by brushing, rolling and spraying. BORATHOR PLUS can also be applied into wall void in existing structures to control such pests.

¹⁰ This application is advocating use as a soil applied termiticide, and borate products are not approved for use as soil applied termiticides.

- Subsequent submissions of label amendments for this product must include clear concise directions for controlling wood destroying beetles, and carpenter ants. The current label is vague and potentially misleading with regards to these pests.
- 4. Acceptable Storage Stability and Corrosion characteristics data must be provided to the Agency within 1 year of this stamped approved label.
- 5. Submit two copies of the revised final printed label for the record before the product is released for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Richard J. Gebken

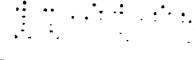
Product Manager (10)

Insecticide Branch

Registration Division (7505P)

Kilme of Cell

Enclosure: Label stamped "Accepted with Comments" documents



ACCEPTED
with COMMENTS
in EPA Letter Dates

FEB 16 2007

Under the Federal Insecticide.
Pungiside, and Rodamicide Ast
as assended, for the posticide
registered under EPA Reg. No.
8/824-9

BORATHOR PLUS

Termiticide, insecticide and fungicide for the prevention and control of subterranean termites (including Formosan), drywood termites, Carpenter ants, wood infesting beetles, fungi (rot), algae and cockroaches.

For both interior and exterior use in and around homes, apartments, garages, museums, public and private institutions, schools, hotels, hospitals, kennels, stables, farm buildings, trucks, trailers, warehouses and non-food areas of supermarkets, restaurants and food processing plants.

Active Ingredient:	By Wt.
odium Octaborate Tetrahydrate	40.0%
*her Ingredients:	<u>60.0%</u>
. JTAL:	100.0%

EPA Reg. No. 81824-X EPA Est. XXXXX-XX-XXX

STOP – Read the label before use KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta gue la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For more information call 1-868-367-8467 or www.for-thor.com.

NET CONTENTS:

ENSYSTEX II, Inc.

Fayetteville, NC 28303

FIRST AID		
lf inhaled	Move person to fresh air. If 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 treatment advice.	
If on skin or clothing	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.	
If in eyes	 Hold eye open and rinse slowly and gently with water for 15 to 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. 	
	HOT LINE NUMBER	

Have the product container or label with you when calling a polson control center or doctor or going for treatment. You may also contact 1-800-369-4352 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals CAUTION

Harmful if inhaled or absorbed through skin. Avoid breathing vapors or spray mist. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Thoroughly wash with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Avoid contamination of food or feed. Do not leave container where children or animals may gain access.

Personal Protective Equipment (PPE): Applicators and other handlers must wear long-sleeved shirt and long pants, socks, shoes, chemical resistant gloves and protective eyewear. When applying BORATHOR PLUS in confined spaces, it is recommended that ventilation or an exhaust system be provided. If this is impractical the use of a NiOSH-approved respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approved prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approved prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter is recommended.

Environmental Hazards

This pesticide is toxic to fish and wildlife. Do not apply directly to water, to intertidal areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

Physical and Chemical Hazards

Do not apply solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a makener inconsistent with its labeling. Read and understand the entire label before using. Use only according to label directions.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry (preferably locked) storage area inaccessible to children and pets. Do not 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

GENERAL INFORMATION

BORATHOR PLUS is a longlasting insecticide / fungicide that can be used preventatively (to prevent future infestations) or remedially (to control existing infestations) against a wide range of wood infesting and destroying organisms. The active ingredient in BORATHOR PLUS, disodium octaborate tetrahydrate, is an inorganic salt with insecticidal and fungicidal properties that is soluble in water. BORATHOR PLUS is mixed with water and applied in solution to the bare surface of wood and other cellulose containing components to protect them against wood infesting and destroying organism attack.

Wood Infesting and Destroying Organism Control

BORATHOR PLUS can be applied to wood and cellulose containing structural components to protect them against wood infesting and destroying organisms (insects and fungl). BORATHOR PLUS can be applied as a preventative (before signs of infestation are found) or remedial (after signs of infestation are found) treatment to existing structures or as a preventative treatment to structures under construction (pre-treatment).

Immediately after application, BORATHOR PLUS begins to penetrate the component. The depth to which the active ingredient penetrates is dependent on several factors such as the moisture content of the component and the wood species in the case of wooden components. Once the active ingredient is in place, it will not decompose or volatilize of the component as long as it is kept protected from moving water.

..e active ingredient in BORATHOR PLUS is a stomach poison that its insects only after they have consumed it. Before BORATHOR PLUS kills the attacking insect, some etching of BORATHOR PLUS treated wood may occur due to the insect's attack.

Wood Destroying Insects Controlled

BORATHOR PLUS is effective in preventing and remediating infestations of the following wood destroying insects:

Subterranean Termites (Reticulitermes, Heterotemes, Coptotermes)

Drywood Termites (Kalotermes, Incisitermes)

Dampwood Termites (Zootermopis, Neotermes)

Powderpost Beetles (Lyctidae)

False Powderpost Beetles (Bostrichidae)

Deathwatch and Furniture Beetles (Anobildae)

Old House Borers, Longhorn Beetles (Cerambycidae, Hylotrupes)

Carpenter Ants (Camponotus)

Bark and Timber Beetles (Scolytidae)

od Decay Fungi Controlled

GORATHOR PLUS is effective at preventing and remediating estations of wood decay fungi including White Rot, Brown Rot (Porle) and wet rots. BORATHOR PLUS kills fungi on contact,

Other Organisms Controlled

BORATHOR PLUS also controls Algae and general household pests such as cockroaches.

Using BORATHOR PLUS against Wood Infesting and Destroying Organisms

BORATHOR PLUS can be applied to and used to protect all types of wood and cellulose containing components, including but not limited to, lumber, logs, plywood and cellulose insulation, situated within the interior and/or on the exterior of structures, so long as they remain protected from moving moisture and are not in direct contact with the soil. BORATHOR PLUS will not adequately protect wood exposed to moving moisture such as liquid water dripping onto or moving across its surface such as rain or plumbing leaks.

BORATHOR PLUS is applied as a dilute liquid solution mixed with water. Successive applications of BORATHOR PLUS solutions incrementally increase the loading and depth of penetration of the active ingredient into the wood, increasing the level of protection against insect and fungi attack.

In addition to treatment with BORATHOR PLUS, effective insect and fungi control may also include mechanical alteration of the structure to stop moisture accumulation on or within the confines of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that may cause an increase in the moisture content of wooden structural components of the structure is advised. If possible, break contact between the ground and untreated wooden components of the structure. When untreated wooden components of the structure touch the ground and such contact cannot be broken, protect these components of the structure against termite attack using a termiticidal product labeled to provide such protection.

General Household Pest Control

BORATHOR PLUS can also be used to prevent the establishment of general household pests such as cockroaches within a structure.

DILUTION AND MIXING DIRECTIONS

BORATHOR PLUS is always diluted with water before use. Do not apply BORATHOR PLUS undiluted. Dilute BORATHOR PLUS with water as instructed, mixing the BORATHOR PLUS and water vigorously and thoroughly until a uniform, clear solution is obtained. Using warm or hot water and an impeller type mixer can speed the dilution process and can result in a more uniform solution. If the tank of the application equipment to be used to apply BORATHOR PLUS does not contain a powered recirculation system, BORATHOR PLUS should be mixed in a separate mixing tank and transferred to the application equipment tank before use. Mixing BORATHOR PLUS directly in the application tank can clog hoses and nozzles. Diluted BORATHOR PLUS should be used within 24 hours after mixing. Do not leave unused solution in a tank overnight. Clean and/or flush application tank, lines and nozzles with water after each use.

The amount of water with which BORATHOR PLUS is diluted before application to form a ready to use treatment solution can depend on several factors including the target pest(s), method of application, whether the treatment is preventative or remedial and the thickness and nature of the component being treated. The amounts of BORATHOR PLUS and water to combine for a treatment solution is referred to as the "Dilution Ratio" and is expressed by a pair of numbers (e.g. 2:1). These two numbers denote, in order, the proportions of water and BORATHOR PLUS that should be mixed to form any amount of treatment solution. The first number in the ratio is the "parts" water to add to the mixing tank. The second number in the ratio is the "parts" BORATHOR PLUS to add to the mixing tank. The actual amount of each of the "parts" is chosen by the mixer / applicator based on the lotal amount of treatment solution needed to perform the treatment. For example, a Dilution Ratio of 5:1 means that 5 parts of water should be mixed with 1 part of BORATHOR PLUS. If the parts are gallons, then the final treatment solution would consist of a mixture of 5 galloris of water and 1 gallon of BORATHOR PLUS. If the parts are quarts, then the final treatment solution would consist of a mixture of 5 quarts of water and 1 quart of BORATHOR PLUS.

For treatments to wooden components where the total area to be treated is not precisely known, mix proportions of water and BORATHOR PLUS according to the Target Pest Specific Dilution Ratio Tables. Refer to the Component Specific Application Rate Tables for directions on diluting BORATHOR PLUS for application to individual wooden components or groups of similarly sized wooden components for which the number of components or total surface area of the components can be accurately pre-determined.

BORATHOR PLUS may be tank-mixed with compatible non-residual pesticides for quicker knockdown of Carpenter ants and other insects, or with an approved fungicide for increased performance against mold.

Target Pest Specific Dilution Ratio Tables

Find the table below for the target pest. Select a column within the chosen target pest table based on whether the application will be remedial or preventative. Then find the row in the table representing the application method you intend to use. The value on this row is the Dilution Ratio for this treatment. Combine and mix parts of water and BORATHOR PLUS according to this Dilution Ratio. Alternately, BORATHOR PLUS can be mixed with water at a Dilution Ratio of 1 part water: 1 part BORATHOR PLUS for application against any target pest.

All Insects Water: BORATHOR PLUS Dilution Ratios		
Application Method	Remedial	
Spray	1:1	
Brush	1:1	
Roller	1:1	
Injection	1:1	

Subterra Water : BORATHO	anean Termi OR PLUS Dil	
Application Method	Remedial	Preventative
Spray	1:1	1:1
Brush	1:1	1:1
Roller	1:1	1:1
Injection	1:1	1:1
Foaming	2:1	2:1
Misting	2:1	2:1

Drywe Water : BORATHO	ood Termite OR PLUS Dil	ution Ratios
Application Method	Remedial	Preventative
Spray	1:1 or 2:1	5:1
Brush	1:1 or 2:1	5:1
Roller	1:1 or 2:1	5:1
Injection	1:1 or 2:1	5:1
Foaming	1:1 or 2:1	5:1
Misting	1:1 or 2:1	5:1

Beetle and Borer Water : BORATHOR PLUS Dilution Ratios				
Application Method	Remedial	Preventative Wood < 4"	Preventative Wood > 4"	Hardwood Floor
Spray	1;1	5:1	1:1	2:1
Brush	1:1	5:1	1:1	2:1
Roller	1:1	5:1	1:1	2:1
injection	1:1	5:1	1:1	2:1
ming	1:1	5:1	1:1	N/A
Misting	1:1	5:1	1:1	N/A

Carpenter Ant Water : BORATHOR PLUS Dilution Ratios		
Application Method	Remediai	Preventative
Spray	1:1	5:1
Brush	1:1	5:1
Roller	1:1	5:1
Injection	1:1	5:1
Foaming	2:1	5:1
Misting	2:1	5:1

Fungi (Rct) and Algae Water : BORATHOR PLUS Dilution Ratios				
Application Method	Remedial < 4" Remedial > 4" Preventation			
Spray	3:1	1:1	5:1	
Brush	3:1	1:1	5:1	
Roller	3:1	1:1	5:1	
Injection	3:1	1:1	5:1	
Foaming	3:1	1:1	5:1	
Misting	3:1	1:1	5:1	

Component Specific Application Rate Tables

These tables are used to treat individual wooden components or groups of wooden components for which the surface area of the components can be pre-determined. The application rates in these tables are based on an application rate of one gailon of BORATHOR PLUS dilution to the surface of 400 board feet of lumber. One board foot equals a volume of wood equal to 1 inch x 1 inch x 12 inches. Dilute BORATHOR PLUS with water as directed.

rom the Target Pest S e instructions for those 1 gallon of diluted	tables.
1 gallon of diluted	
ORATHOR PLUS will eat up to this number of lineal feet of	Minimum number of gallons of diluted BORATHOR PLUS to treat 1000 lineal Feet
1,200	0.8
400	2.6
600	1.6
400	2.6
308	3.2
240	4.2
200	5.0
300	3.4
200	5.0
150	6.8
100	10.0
133	7.6
100	10.0
	10.0 12.6 15.0
	1,200 400 600 400 308 240 200 300 200 150

Paneling,	Siding and Plywood Applic	cation Rates
	Dilution Ratio for all remedia BP Dilution Ratio for prever	
Thickness (inches)	1 Gallon of BORATHOR PLUS solution will treat up to this number of square feet of paneling, siding or plywood:	Minimum number of gallons BORATHOR PLUS solution needed to treat 1000 square Feet
1/4	1,600	0.6
3/8	1,067	1.0
1/2	800	1.2
3/4	533	1.8
1	400	2.6

	ound Log Application Rai iution Ratio for all treatmen	
Dlameter (inches)	Gallon of BORATHOR PLUS solution will treat up to this number of lineal feet of round logs:	Minimum number of gallons of BORATHOR PLUS solution to treat 1000 lineal Feet
6	167	6.0
8	96	10.4
10	61	16.4
12	43	23.4

Foam Mixing Directions

BORATHOR PLUS can be applied as a foam by mixing 3 to 8 fluid ounces of foaming agent with each gallon of BORATHOR PLUS solution. See the Target Pest Specific Dilution Ratio Tables for the correct Dilution Ratio for each target pest or application site for a foam application. Expand each gallon of BORATHOR PLUS solutions to 20 to 30 gallons of foam before application. Foam will take approximately one hour to return to liquid form after application.

APPLICATION DIRECTIONS

RATHOR PLUS can be applied to almost any type of cellulose intaining building material or component including wood, lumber, logs, interval particle board, oriented strand board (OSB), drywall, cellulosic insulation and wood composite structural components to control wood infesting and destroying organisms attack against them. Do not apply BORATHOR PLUS to surfaces that are covered by a decorative or protective coating such as paint, stain or sealer. Any decorative or protective coating must be removed before applying BORATHOR PLUS. BORATHOR PLUS can be applied to a component surface by brushing, rolling or spraying. Subsurface application can be made by injection into infested and sound wood (40 psi recommended). Applications can also be made by foaming or misting into void areas. Use soap and water to clean up tools.

BORATHOR PLUS is applied to the bare surface of all components to the point of wetness, unless otherwise directed. This rate of treatment approximates the application of 1 gallon of dilute BORATHOR PLUS dilutions to 400 square feet of component surface. Each application should consist of at least one coating of BORATHOR PLUS solution. A second coat should be applied to components to which, because of their location or orientation in the structure, treatment can be applied to only one or two sides of the component. Wait at least twenty minutes ween applications.

DORATHOR PLUS can be applied to non-wood (e.g. masonry) surfaces structures to prevent the establishment in the structure of infestations general household pests such as cockroaches. Target surfaces include interior masonry walls of crawl spaces and unfinished basements in addition to wood surfaces. BORATHOR PLUS can also be applied into wall volds in existing structures to control such pests.

A marker dye or pigment can be added to BORATHOR PLUS dilutions to facilitate marking and tracking of the progress of the application. Mix and use the dye or pigment according to the manufacturer's directions for use.

When spraying overhead interior finished areas of structures, cover or protect all surfaces below the area being sprayed with plastic sheeting or other material that can be disposed of if contamination from dripping occurs. Do not apply in food serving areas while food is exposed.

For the purposes of treatments applied according to the instructions of this label to structures under construction, structural components are defined as the "skeletal" parts of the structure made of wood and other cellulose containing substances that help give the structure its basic shape and rigidity. Structural components include parts of the structure constructed of wood and other cellulose containing substances such as sills, plates, joists, girders, sub-flooring, wall studs, trusses, rafters, decking and exterior sheathing. Differing degrees of completeness of protection against the wood infesting and destroying organisms controlled by BORATHOR PLUS can be imparted to structures under construction based on the extent to which the structural components of the structure are treated with BORATHOR PLUS with the greatest level of control imparted with a treatment to all components surfaces.

BORATHOR PLUS can be used to supplement the use of other subterranean termite control technologies such as soil applied termiticides or termite baits. BORATHOR PLUS can be used to protect structures against termite attack where it is critical that no movement of the active ingredient occur after application, such as termite treatments to structures containing or near cisterns and wells. BORATHOR PLUS is not a soil termiticide. Do not use to directly treat soil unless otherwise directed.

Adult forms of insects (such as beetle adults) may emerge from the wood some period of time after treatment. The BORATHOR PLUS treatment will kill any young that hatch from any eggs they laid.

Spraying water on some wood species can mobilize natural wood extractives, raise the grain and leave behind calcium or other deposits. Prior to treating large areas, treat a small area with BORATHOR PLUS solution to ensure satisfaction with the final appearance of the treated surface after it dries.

Mixing of BORATHOR PLUS as a Foam

BORATHOR PLUS can be applied as a foam by mixing 3 to 8 fluid ounces of foaming agent with each gallon of BORATHOR PLUS solution, Refer to the *Target Pest Specific Dilution Ratio Tables* for the correct Dilution Ratio for each target pest. Expand each gallon of BORATHOR PLUS solution to 20 to 30 gallons of foam before application. Foam will take approximately one hour to return to liquid form after application.

Protection of Exposed Treated Component Surfaces

Long term protection of treated components exposed to moving water (such as exterior components) is possible only if their treated surfaces are protected. Exterior treated component surfaces should be topcoated with a water resistant finish no sooner than after the treatment has completely dried (normally 48 hours after treatment) and no longer than 6 weeks after the date of treatment. Coat a small section of the component with the finish to confirm the compatibility of the finish with the treated component surface prior to making the complete application. If the treated surface remains tacky after 48 hours and a topcoat will be applied, wash and scrub the surface to remove any treatment residue and allow it to dry before proceeding with the topcoat.

Remedial and Preventative Treatment to Existing Structures

Applications of BORATHOR PLUS to structural components of existing structures can be made to prevent or remediate infestations of all the wood infesting and destroying organisms that are controlled by BORATHOR PLUS. Dilute BORATHOR PLUS according to the Target Pest Specific Dilution Ratio Tables based on the target pest. Alternately, use a Dilution Ratio of 1 Water: 1 BORATHOR PLUS to prevent or remediate any target pest controlled by BORATHOR PLUS.

Apply BORATHOR PLUS to all exposed surfaces of all accessible wooden and cellulose containing structural components such as sills, plates, joists, girders, sub-floors, trusses, roof decking and general framing in basements, attics and crawl space areas. Do not apply BORATHOR PLUS to wood surfaces with decorative or protective coatings such as paint, stain or sealer. Remove any such coatings before application. Apply at least one coating of BORATHOR PLUS solution to the point of wetness to the bare surface of components by brushing, rolling or spraying. A second coat should be applied to components to which, because of their location or orientation in the structure, treatment can be applied to only one or two sides of the component. Wood to which access is normally limited to one or two sides (and to which two treatments should be applied) include sills and plates on foundation walls. Application of a second coat to infested components can also speed control. Wait at least twenty minutes between applications.

BORATHOR PLUS solutions can be injected into insect galleries and decay pockets within structural components, if present, until runoff is observed. If the infestation is not accessible from the surface of the structural component (exit holes are not present), drill small holes at eight to ten inch intervals and inject solution into the holes to flood galleries and voids. Inject BORATHOR PLUS for 4 to 6 seconds per hole under 40 psi pressure. Injections can also be made into sound wood by drilling and treating under pressure. Injection treatments can be applied to structural components without removing any decorative or protective coating from their surface.

Structural components Inside of walls resting on slabs can be treated by drilling access holes through the wall covering and applying BORATHOR PLUS solution into the wall voids. Using a wall stud locating device, drill holes immediately adjacent to the sides of wall studs and apply 1/3 fluid ounce of BORATHOR PLUS solution per hole. Additionally, drill within each stud bay at least one hole near the floor and above the base plate and apply solution above the top surface of the base plate. Alternately, inject void areas with a BORATHOR PLUS foam mixed according to the foaming directions contained in the Mixing BORATHOR PLUS as a Foam section. Apply enough foam to fill void areas. The most complete protection is created by treating entire walls as opposed to single stud bays. It may be necessary to move or shift insulation within wall voids to keep it from Interfering with the application.

Preventative and Remedial Treatment to Wood Flooring

BORATHOR PLUS can be applied to wood flooring. Make preventative or remedial treatments by brushing, rolling or spraying a BORATHOR PLUS solution onto the bare floor surface. Any finish on the floor must be removed by sanding or stripping before application of BORATHOR PLUS. Dilute BORATHOR PLUS for application to flooring according to the Target Pest Specific Dilution Ratio Tables. Treat at a rate of one gallon of dilute BORATHOR solution per 500 square feet of floor surface. Treatments to control termites may require two applications. Walt one hour between applications. Allow floor to dry for 72 hours. If at that time the surface is tacky or a residue remains, mop or sponge the area, rinsing frequently until tackiness and residue are removed. It ⇒ be necessary to sand the floor to remove any spots where the ition may have raised the grain of the wood. The floor surface must dry and the wood moisture content of the floor must be reduced to 10% before any finish is applied to the floor. Before applying finish, always test a small section of the floor with the new finish to make sure the finish will adhere properly to the newly treated floor.

Preventative Treatment of Structures Under Construction (Pretreatment or Pretreat)

Applications of BORATHOR PLUS to exposed surfaces of cellulose containing structural components of structures under construction can be made to prevent infestations of and damage to these structural components by all the wood infesting and destroying organisms that are controlled by BORATHOR PLUS. Structural components are defined as the "skeletal" parts of the structure made of wood and other cellulose containing substances that help give the structure its basic shape and rigidity. Structural components include sills, plates, joists, girders, subflooring, wall studs, trusses, rafters, decking and exterior sheathing.

Time applications of BORATHOR PLUS to structures under construction to occur at the point during their construction when the bare surfaces of a maximum number of structural components of the sucture are exposed. This is normally after structural framing is upleted and exterior sheathing and roof decking are in place (often insulation, mechanical components, electrical wiring or drywall has agun. Application is best performed when greatest access to all structural components is available and when no further framing modifications will be made, such as after final framing inspection. If treatment is carried out prior to the final framing inspection and approval, additional visit(s) are required to ensure full treatment is still intact.

Preventative Whole Structure Wood Destroying Organism Treatment to Structures Under Construction

Note: This treatment is applied to structures under construction and serves as a primary treatment for all wood infesting and destroying organisms controlled by BORATHOR PLUS including subterranean termities.

Whole structure protection against the wood infesting and destroying organisms controlled by BORATHOR PLUS is created when all of the exposed surfaces of all the accessible structural cellulose containing components of the structure are treated at the time of construction with BORATHOR PLUS. Whole structure treatments to structures under construction are applied in two steps. Each step involves a separate application of BORATHOR PLUS to a separate part of the structure. The applications are applied in two steps because the different steps involve application of BORATHOR PLUS solution at different Dilution Ratios.

The first step of whole structure protection is the application of a 1 part Water: 1 part BORATHOR PLUS solution to the portions of the structure touching or near the foundation according to the directions contained in the Subterranean Termite Only Preventative Treatment to Structures Under Construction (Subterranean Termite Pretreatment) section below. The second step is the application of a 5 part Water: 1 part BORATHOR PLUS solution to the structural components of the structure to which an application for subterranean termite control will not be made. For treatment of new log structures refer to the Remedial and Preventative Treatment of Log Structures, Beams and Pllings Two or More Inches Thick section of this label.

Whole Structure Pre-Treatment Step 1. Subterranean Termite Only Preventative Pre-Treatment

Apply BORATHOR PLUS according to the Subterranean Termile Only Preventative Treatment to Structures Under Construction (Subterranean Termite Pretreatment) section below.

Whole Structure Pre-Treatment Step 2. Whole Structure Preventative Pre-Treatment for all Wood Destroying and Infesting Organisms other than Subterranean Termites

Apply a 5 part Water: 1 part BORATHOR PLUS solution to all exposed surfaces of all accessible interior structural component surfaces that will not be treated according to Step 1. Surfaces to be treated include the surfaces of sills, plates, joists, girders, sub-flooring, interior and exterior wall studs, trusses, rafters, roof decking and exterior sheathling. Concentrate treatment to structural components in high moistures areas such as bathrooms, kitchens and laundry rooms. Also treat all exposed surfaces of all accessible exterior structural components including exterior walls, exterior sheathing, siding, facias, soffits, eaves, porches, decks and raillings. The completeness of the protection imparted to the structure will be directly related to the extent to which all of the structural components are treated. Avoid spraying live electrical components.

Subterranean Termite Only Preventative Treatment to Structures Under Construction (Subterranean Termite Pretreatment)

Note: This treatment is applied to structures under construction and serves as a primary treatment for the control of subterranean termites.

Preventative BORATHOR PLUS treatments intended to protect the structure against subterranean termite attack are designed to stop termites that enter the structure from proceeding any further than the first BORATHOR PLUS treated surface they encounter. This involves the application of BORATHOR PLUS to the exposed surfaces of all cellulose containing structural components that are adjacent or close to possible points of subterranean termite entry into the structure. Generally this is accomplished by applying a BORATHOR PLUS solution to the exposed surfaces of all cellulose containing structural components that rest on or are adjacent to the foundation (masonry walls and/or slab floors) of the structure.

BORATHOR PLUS may not protect parts of structures where there are no BORATHOR PLUS treated structural components between points of potential termite entry into the structure and points of potential termite attack. This circumstance may exist, for example, in areas where wooden baseplates resting on slabs and the stud walls resting upon these baseplates are made of a material other than wood. Supplement the use of BORATHOR PLUS in structures where such circumstances exist with the application of other forms of subterranean termite protection to protect the sections of the structure not adequately protected by BORATHOR PLUS. Do not rely upon treatment with BORATHOR PLUS as a primary treatment for the control of termites in any new structure in which less than 60% of the total linear footage of baseplates (include the baseplates for exterior and interior walls in the calculation) are made from wood or a celluloslc containing material.

Subterranean Termite Only Exterior Treatment to All Structures:

Apply a 1 part Water: 1 part BORATHOR PLUS solution to the point of wetness to all exposed surfaces of all accessible structural components around the exterior of the structure that are within two feet (twenty four inches) of the top of the foundation. This treatment can take the form of a continuous band treatment around the exterior of the structure to the first two feet of cellulose containing structural components above the structural components may normally be required to most off the structural components covered by this treatment because access will normally be limited to only one or two sides of the components. Wait at least 20 minutes between treatments.

Subterranean Termite Only Treatment to Structures Containing Crawl Spaces

Apply a 1 part Water: 1 part BORATHOR PLUS solution to the point of wetness to all exposed surfaces of all crawl space accessible structural cellulose containing components that are within two feet (twenty four inches) of the top of the foundation. This treatment can take the form of a continuous band treatment running along the foundation wall to the parts of cellulose containing structural components touching and/or adjacent to foundation walls and pillars such as sills, plates, joists, girders and sub-floors that are within two feet of the foundation. Also treat adjacent to where plumbing, electrical conduits and heating ducts penetrate the sub-structure.

Subterranean Termite Only Treatment to Structures Containing Slabs

Apply a 1 part Water: 1 part BORATHOR PLUS solution to all exposed surfaces of all accessible cellulose containing structural components that are within two feet of the slab floor surface and foundation such as stud wall baseplates and the first two feet of stud walls resting on the baseplates. Evenly treat the surface of dirt filled bath traps at a rate of sixteen ounces of solution per square foot of trap.

Subterranean Termite Only Treatment to Structures Containing Basements

Depending on their configuration, the upper portion (ceilings) of sements should be treated according to the directions found in the *Iterranean Termite Only Treatment to Structures Containing Crawl naces* section above and the lower portion of basements (floor area) mould be treated according to the directions found in the *Subterranean Termite Only Treatment to Structures Containing Stabs* section above. Additionally, apply BORATHOR PLUS to the complete length of all cellulose containing structural components touching or adjacent to masonry walls such as vertical stud walls close to or touching the basement masonry foundation walls.

General Pest Application During Subterranean Termite Pre-Treatment Application

BORATHOR PLUS can also be applied to the exposed surface of accessible wooden and non-wooden (e.g. masonry) structural components to help control the establishment of general pest infestations such as cockroaches within the structure. This treatment can conveniently be applied at the same time as an application for the prevention of subterranean termities is being applied to the sub-structure. Refer to the Remedial and Preventative Application for General Pests section for more information.

Remedial and Preventative Treatment of Single Wooden Components or Groups Of Similar Wooden moonents

"efer to the Component Specific Application Rate Tables for the ution Ratios and application rates for applying BORATHOR PLUS to different wooden components based on their size and thickness.

Long term protection of exterior wooden components with BORATHOR PLUS is possible only if treated surfaces are topcoated with a water resistant finish no sooner than after the treatment has completely dried (normally 48 hours after treatment) and no longer than 6 weeks after the date of treatment. Coat a small section of BORATHOR PLUS treated wood with the finish to confirm the compatibility of the finish with the treated wood surface prior to making the complete application. If the treated surface remains tacky after 48 hours and a topcoat will be applied, wash and scrub the surface to remove any treatment residue and allow to dry before proceeding with the topcoat.

Remedial and Preventative Treatment of Decks, Fences and Siding Constructed of Wooden Components Two or Less Inches Thick

This treatment is applied to wooden components two or less inches thick including decks, fences and siding. Refer to the Component Specific Application Rate Tables for the Dilution Ratios and application rates for applying BORATHOR PLUS to different wooden components based on their size and thickness. Make applications by brushing, rolling or spraying. Apply only to surfaces without any type of decorative or protective coating or finish. If necessary, remove any such coating or finish before application. Apply a second coat to

components to which access is limited to only one or two sides of the component and to heavily infested components. Wait a least 20 minutes between treatments. Do not apply during periods of precipitation. Protect treated surfaces from moving water for at least 48 hours after treatment.

Remedial and Preventative Treatment of Log Structures, Beams and Pilings More Than Two Inches Thick

This treatment is applied to wooden components more than two inches thick including timbers, beams, pilings and logs. Refer to the Component Specific Application Rate Tables for the dilution Ratios and application rates for applying BORATHOR PLUS to different wooden components based on their size, thickness and number or surface area. Make applications by brushing, rolling or spraying. Apply only to bare wood surfaces without any type of decorative or protective coating or If necessary, remove any such coating or finish before application. Apply a second coat to components to which access is limited to only one or two sides of the component and to heavily infested components. Wait at least 20 minutes between treatments. Two coats of BORATHOR PLUS solution are also needed to adequately treat wood six or more inches thick. When treating logs, also apply two coats of BORATHOR PLUS solution to log ends, notches, corners and sill logs. Do not apply during periods of precipitation. Protect treated surfaces from moving water for at least 48 hours after treatment.

Dip Treating Logs and Lumber

Prepare a dip treating solution by creating a quantity of a 5 parts water: 1 part BORATHOR PLUS solution sufficient in quantity to submerge the wooden component when dipped. Sticker bundled wood to ensure the solution covers all wood surfaces. Submerge logs and/or lumber in the solution for at least one minute or until all entrapped air has escaped, whichever period is longer. Protect treated surfaces from moving water for at least 48 hours after treatment.

Preventative and Remedial Treatment to Drywall and Cellulose Insulation to Prevent or Control Algae

BORATHOR PLUS can be applied to drywall and cellulosic insulation in structures under construction and in existing structures for the prevention and remedial control of algae. Refer to the Fungl (Rot) and Algae Dilution Ratio Table to determine the dilution ratio that should be used for specific treatments. Make applications by spray to insulation to the point of wetness and by brush, roller or spray to the point of wetness to the back side only of drywall.

Remedial and Preventative Application for General

BORATHOR PLUS can be applied to the exposed surface of accessible wood and non-wood (e.g. masonry) structural components of structures under construction to prevent the establishment in the structure of infestations of general household pests such as cockroaches. Mix and apply a 1 part Water: 1 part BORATHOR PLUS dilution and apply to the point of wetness to the exposed surface of wooden and non-wood (e.g. masonry) components of the structure such as interior crawl space foundation and basement masonry walls by brushing, rolling land spraying. BORATHOR PLUS can also be applied into wall voids in existing structures to control such pests.

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