



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

May 22, 2008

Mr. Gary R. Orr, Ph.D.,  
Agent for Green Dragon Pest Solutions  
c/o Rivendell Consulting USA, LLC  
400 East Jane Street  
Valdosta, GA 31601-4021

**Subject: Review of Final Label, GreenDragon ROACH KILL™, EPA Reg. No. 84708-1  
Your Submission Dated May 5, 2008**

Dear Mr. Orr:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

Ingredient Statement section comment(s):

- 1. Replace the words "Inert Ingredients" with the words "Other Ingredients."

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

- 2. The statement "Have the product container or label ..." that appears in the middle of this section should actually be part of the First Aid section. Relocate this statement to appear immediately preceding the section heading for this section.

Directions for Use section comment(s):

- 3. In the paragraph starting with "To control Cockroaches, ..." replace the word "dishwasher" with the word "dishwashers."

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product 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 bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

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

Enclosures: Copy of label stamped "Accepted with Comments"

**FIRST AID**

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**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.

**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.

**PRECAUTIONARY STATEMENTS**

**HAZARD TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION.** Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-255-3924 or the National Pesticide Information Center at 1-800-858-7378.

**STORAGE AND DISPOSAL**

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

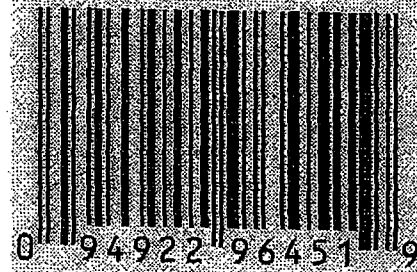
**PESTICIDE STORAGE:**

Store this product in a cool dry area in a place inaccessible to children and pets.

**PESTICIDE DISPOSAL:**

**IF EMPTY:** Do not reuse this container. Place in trash or offer for recycling if available.

**IF PARTIALLY FILLED:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.



EPA REG. NO. 84708 - 1  
EPA EST.  
Made in USA



**Green Dragon  
ROACH KILL™**

**TOUGH ON ROACHES, NOT ON YOU!™**

**KILLS ROACHES, WATERBUGS & SILVERFISH!**

**DIRECTIONS FOR USE**

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

**READ AND FOLLOW ALL DIRECTIONS AND PRECAUTIONS ON THIS PRODUCT LABEL FOR INDOOR RESIDENTIAL USE ONLY.**

**USE RESTRICTIONS:**

- Do not place Green Dragon Roach Kill bait in areas accessible to children and pets.
- Do not contaminate food or feed stuffs.

**SEE BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS**

To control Cockroaches, Ants (except Carpenter, Fire, Harvester and Pharaoh Ants) and Silverfish: Place a small spot approximately the size of a dime on inaccessible surfaces under or behind refrigerators, stoves, sinks, tubs, dishwasher, washing machines and dryers; into openings around drains, water pipes, electrical conduits; and in cracks and crevices around baseboards, corners of cupboards, cabinets, and closets. Remove lower drawers in kitchen and bathroom cabinets, bedroom dressers and place into corners of drawer wells. Reapply once/30 days if needed.

**Active Ingredient: Boric Acid (40%)**

**Inert Ingredients (60%)**

MANUFACTURED BY  
GREEN DRAGON PEST SOLUTIONS

CAUTION: KEEP OUT OF REACH OF CHILDREN  
See Side/Back Panel for Instructions

ACCEPTED  
WITH COMMENTS  
In EPA Letter Dated  
May 22, 2008  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
84708-1