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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Papa Richter's Roach Ridder
DBA Best Bug Bait
c/o Dr, Don O'Shaughnessy
D. O'Shaughnessy Consulting
427 Hide Away Circle
Club Run, KY 42729

FEB - 8 2013

Dear Dr. O'Shaughnessy:

Subject: Application for Pesticide Notification (PRN 98-10)
Alternate Brand Name: Best Bug Bait
Papa Richter's Roach Ridder
EPA Reg. No. 86314-1
Your submission dated January 2, 2013

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 2, 2013 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records. The Agency's records will be updated to include the Additional Brand Name: Best Bug Bait.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions regarding this letter, please contact Dana Pilitt, PhD of my staff at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

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



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 86314-1	2. EPA Product Manager M. Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Papa Richter's Roach Ridder	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Papa Richter's Roach Ridder, DBA / Best Bug Bait 8360 Rolling Rock Lane, Dallas, TX 75238 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION EPA Reg. No. _____ Product Name FEB - 8 2013	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Alternate Brand Name ("Best Bug Bait").
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted If "Yes" Unit Packaging wgt. 1.6 oz net		No. per container 10	If "Yes" Package wgt. _____ No. per container _____

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
10 bait stations of 0.167 oz

5. Location of Label Directions
 On Label
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product insert in pouch
 Lithograph
 Paper glued
 Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Don O'Shaughnessy	Title Agent	Telephone No. (Include Area Code) 270-524-5633
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Certification
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.

2. Signature 	3. Title Agent	6. Date Application Received (Stamped)
4. Typed Name Don O'Shaughnessy	5. Date Jan. 2, 2013	

doc

D. O'Shaughnessy Consulting, Inc.

Jan. 2, 2013

Dr. Mark Suarez (PM 13)
US EPA, OPP Registration Division (7504P)
Rm. S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Dear Dr. Suarez
RE: NOTIFICATION or alternate brand name, 86314-1

D. O'Shaughnessy Consulting, Inc. is authorized to act on behalf of Papa Richter's Roach Ridder ("PRRR", Co. No. 86314) on matters of regulation of pesticide products by US EPA.

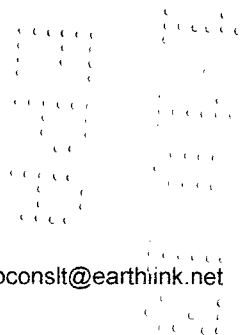
Due to a claim of conflict of copyright for the words, "Roach Ridder", PRRR has registered an alternate "DBA" name with the State of Texas, and wishes to apply this name to the 86314-1 product label. No other changes have been made to the label, as certified in the enclosed NOTIFICATION form. A hard copy plus a CD copy of the amended label are attached.

If you have questions about this matter, please contact me at the co-ordinates on this letterhead or via my cell phone (270-537-5139).

Sincerely,



Don O'Shaughnessy, Ph.D., DABT, DABFM
President



NOTIFICATION

FEB - 8 2013

Best Bug Bait™

Insecticide Bait Stations for Control of German Cockroaches, Silverfish, and Listed Indoor Ants

ACTIVE INGREDIENT:
 Orthoboric Acid27% (by wt.)

OTHER INGREDIENTS:73% (by wt.)

Total:.....100.0% (by wt.)

One bag (10 bait stations) treats approximately 1000 square feet

KEEP OUT OF REACH OF CHILDREN

CAUTION

READ THE ENTIRE LABEL BEFORE USING

EPA Reg. No.: 86314 - 1
 EPA Est. No.: 86314 - TX - 1

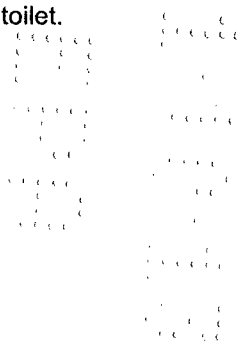
Net Contents: 1.67 ounces in 10 bait stations

Manufactured by:
 Best Bug Bait
 8630 Rolling Rock Lane
 Dallas, TX 75238

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin	<p>Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.</p> <ul style="list-style-type: none"> • Call a poison control center or doctor for treatment advice.
Have the product label with you when calling a poison control center or doctor, or going for treatment.	

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

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



DIRECTIONS FOR USE

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

Product Information

BEST BUG BAIT contains Orthoboric acid, which does not provide rapid knockdown or rapid kill of insects. Insects are attracted to feed on the bait, and may return to nesting areas before they die. Good control of insect populations requires that BEST BUG BAIT be used for a period of several weeks or months along with good hygiene practices.

BEST BUG BAIT is packaged in convenient bait stations with sticky backs to aid in placement.

Insects Controlled

BEST BUG BAIT kills German cockroaches, silverfish, and indoor ants **except fire ants, harvester ants, pharaoh ants, and carpenter ants.**

Application Directions

BEST BUG BAIT may be used in residential houses, multi-family, commercial, industrial, municipal, institutional, research, recreational, health care, educational, hospitality, and agricultural buildings, and other structures including garages, transport vehicles, sewers, animal rearing establishments, and food handling and food processing establishments.

The sticky dot may mar some painted surfaces. Avoid placement on visible painted surfaces.

To place bait stations, remove BEST BUG BAIT Caps from the backing paper. Stick the cap in an out-of-the way location, such as behind refrigerators, on the backs of drawers, and back corners of cabinets. Do not remove backing paper if sliding under refrigerators or ranges. **DO NOT PLACE CAPS WHERE THEY WILL BE ACCESSIBLE TO PETS OR CHILDREN.**

Food Areas:

Food areas include areas for receiving, packaging (canning, bottling, wrapping, boxing), storage, edible waste storage, and enclosed processing systems (mills, dairies, syrup, edible oils). Food areas may also include food serving areas.

DO NOT PLACE CAPS WHERE CONTACT WITH FOOD OR FOOD SERVING VESSELS OR UTENSILS MAY OCCUR.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a dry place in the original packaging. Do not store where children or animals may gain access.

DISPOSAL

Do not re-use this container. Empty bags may be placed in trash.

WARRANTY STATEMENT

IMPORTANT:

Read the entire Label including this disclaimer, Risks of Using this product, Limited Warranty, and Limitation of Liability before using this product.

BEST BUG BAIT warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. To the extent consistent with applicable law, BEST BUG BAIT shall in no event be liable for consequential, special, or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. In addition to the foregoing, no purchaser of this product (other than an end user) shall be entitled to any reimbursement for any loss suffered as a result of any suspension or cancellation of the

