



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 1, 2021

Kukbo Science Co., Ltd
c/o Brian Hogan
Authorized Agent
KRR Consulting LLC
5807 Churchill Way
Medina, OH 44256

Subject: PRIA Label Amendment – Add cockroach claims with submitted efficacy study
with review by RD
Product Name: Fipronil Bait Gel
EPA Registration Number: 88613-1
Application Date: January 22, 2021
Decision Number: 570244

Dear Mr. Hogan:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

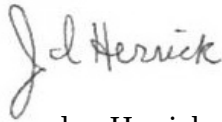
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, you may contact Hester Dingle at 703-347-8860 or via email at dingle.hester@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Herrick". The signature is written in a cursive, flowing style.

Jacquelyn Herrick, Product Manager 03
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Throughout label { } used for Notes to Reviewer, [] used for Optional Text, () used for Essential Text.

Fipronil Bait Gel

FOR USE IN COMMERCIAL, INDUSTRIAL, AND RESIDENTIAL AREAS [Sub-label A]

FOR USE IN RESIDENTIAL AREAS [Sub-Label B]

ACTIVE INGREDIENT:

Fipronil*----- 0.05%

OTHER INGREDIENTS: ----- 99.95%

TOTAL: 100.00%

TARGET INDOOR INSECTS: AMERICAN COCKROACHES (*PERIPLANETA AMERICANA*)

GERMAN COCKROACHES (*BLATTELLA GERMANICA*)

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 88613-1

EPA Est. No.

Manufactured By:

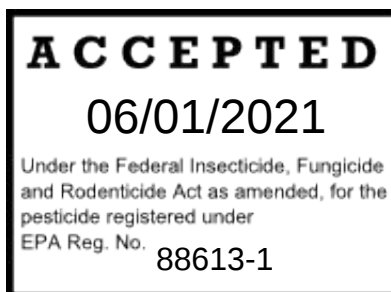
Kukbo Science Co., Ltd.

49 Sandandro, Heungdeok-Ku

Cheongju, South Korea

Net Wt.

Syringe 10g/Tube 20g/Syringe 35g



FIRST AID	
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. • 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 poison control center or doctor for treatment advice.
If swallowed:	• 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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
FOR MEDICAL EMERGENCY INFORMATION CALL A POISON CONTROL CENTER at 1-800-222-1222. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on this product, contact the National Pesticides Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8 AM to 12 PM PST, or at http://npic.orst.edu.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

Personal Protective Equipment: Applicators and other handlers must wear the following:

Wear long-sleeved shirt and long pants, socks, shoes, and waterproof gloves. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to birds, fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure that wind or rain does not blow or wash pesticide off the treatment area.

PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment where possibility of shock hazard exists. Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

ACCEPTED

06/01/2021

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 88613-1**SUB-LABEL A: COMMERCIAL USE LANGUAGE****Fipronil Bait Gel****FOR USE IN COMMERCIAL, INDUSTRIAL, AND RESIDENTIAL AREAS****ACTIVE INGREDIENT:**

Fipronil*----- 0.05%

OTHER INGREDIENTS: ----- 99.95%**TOTAL:** 100.00%**TARGET INDOOR INSECTS: AMERICAN COCKROACHES (*PERIPLANETA AMERICANA*)
GERMAN COCKROACHES (*BLATTELLA GERMANICA*)****KEEP OUT OF REACH OF CHILDREN****CAUTION**

EPA Reg. No. 88613-1

EPA Est. No.

Manufactured By:
Kukbo Science Co., Ltd.
49 Sandandro, Heungdeok-Ku
Cheongju, South KoreaNet Wt.
Syringe 10g/Tube 20g/Syringe 35g**FIRST AID**

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PRECAUTIONARY STATEMENTS

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Personal Protective Equipment: Applicators and other handlers must wear the following: Wear long-sleeved shirt and long pants, socks, shoes, and waterproof gloves. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to birds, fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure that wind or rain does not blow or wash pesticide off the treatment area.

PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment where possibility of shock hazard exists. Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

DIRECTIONS FOR USE

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

Use Ultra Max Gel as a spot or crack and crevice treatment for the indoor control of insects in residential areas and the non-food/non-feed areas of institutional, commercial establishments, warehousing and apartment buildings, cereal processing, schools, frozen food plants, office buildings, bottling facilities, hotels, warehouses, hospitals, buses, boats/ships, trains, laboratories, motels, supermarkets, breweries, restaurants, food processing plants, bakeries, spice plants, nursing homes, beverage plants, candy plants, canneries, and manufacturing plants, dairies and dairies product processing plants, computer facilities, sewers, aircraft, homes, houses, zoos, industrial buildings, kennels, manufacturing facilities, stores, wineries and similar structures, mausoleums, meat processing and packaging plants, meat and vegetable canneries, pet shops. Non-food/non-feed areas: boiler rooms, media rooms, closets, garbage rooms, bedrooms, garages, living rooms, bathrooms, offices, lavatories, locker rooms, entries, and vestibules, machine rooms, mop closets, and storage [after canning or bottling]. This product may also be used in food/feed handling establishments as outlined below. May stain textiles, fabrics, and or porous surfaces.

Use Restrictions:

- Keep gel away from food contact surfaces and foods. DO NOT treat food preparation surfaces.
- DO NOT apply product in areas which have been recently sprayed with insecticides. DO NOT spray insecticide over gel as it may cause the gel to become repellent.
- DO NOT USE IN AREAS EASILY ACCESSIBLE TO CHILDREN AND PETS.
- Place bait out of reach of zoo animals and pets.

APPLICATION DIRECTIONS

Application rate for all uses: Application rate varies according to the species to be controlled and level of infestation. Apply gel into cracks and crevices as a spot treatment or as round spots or thin beads. Multiple smaller bait placements provide faster control than fewer larger placements. Place bait close to foraging and feeding areas: corners and cracks and crevices. Use the higher rate of application in case of severe infestation and areas with excessive clutter or alternative food sources that cannot be eliminated.

Stored product pests: For light to moderate infestations [or for retreatments], use up to 1.5 grams of bait per square yard of area. For severe or heavy infestations, use up to 3.0 grams of bait per square yard of area. Use 0.75 grams of bait per square yard for maintenance programs where regular monthly applications are made for continuous control. Note that this rate will not provide immediate control of existing infestations. Apply 0.5 grams of bait per square yard as minimum use rate.

BAIT QUANTITY REFERENCE TABLE	
Approximate weight per spot diameter	Approximate weight per bead length
0.5 gram = 1/4 inch diameter spot	1/3 gram = 1.5 inch bead
1.0 gram = Dime size spot	2/3 gram = 3.0 inch bead
1.5 gram = Quarter size spot	1 1/3 gram = 6 inch bead

Place bait in crack and crevices as well as voids where listed insects harbor under baseboards, countertops, sinks, seats, around dishwater equipment, water pipes and water heaters.

PANTRY PESTS: To control adult stages of beetles: cadelle, cigarette beetle, confused flour beetle, dermestid, drugstore beetle, flat grain beetle, granary weevil, lesser grain borer, lesser mealworm, mealworm, merchant grain beetle, red flour beetle, rice weevil, rusty grain beetle, saw-toothed beetle, spider beetle, or warehouse beetle. After cleaning up spilled foodstuffs and removing infested foodstuffs, application of this product in area of adult stages of beetles. Apply in cracks and crevices, voids, behind and under cupboards, and other difficult to reach areas where insects may hide. Adjust application rate according to level of infestation.

Application in Food/Feed Handling Establishments: Application within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment only. Apply with bait injector directly into cracks and crevices. Place applicator tip 1/2 inch into cracks and crevices. Apply small amounts of gel. If gel contacts an exposed surface where food is handled, remove gel and wash exposed surface with an effective cleaning compound followed by potable water rinse prior to use.

Use Restrictions in Food/Feed Handling Establishments:

- 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 areas where food/feed, processing surfaces or utensils, may become contaminated.

Food/feed areas include areas of storage, packing, preparing edible waste storage, and enclosed processing systems: dairies, mills, syrups). Serving areas are also considered a food/feed area when food is present and facility is in operation. Apply gel in small amounts in cracks and crevices with this product only between equipment, cracks and crevices in: floors, walls, ceilings, around doors and windows, plumbing pipes, sinks, closets where listed insects hide. During follow-up visits inspect bait placements and reapply when necessary.

Do not apply this product in food/feed areas of food/feed handling establishments other than as a crack and crevice treatment.

Directions for Syringe

To apply gel: Remove the cap on the nozzle, touch the tip to area of application and depress the plunger. Make sure surface is non-dusty or non-greasy. Reapply when bait is no longer visibly present, according to the remaining level of infestation, which is generally at a lower rate than the initial treatment. Refer to Application Rate Table. A visual inspection of bait placement is recommended every 3-4 weeks after the initial treatment. Reapplication should occur if the bait is visibly depleted.

For light to moderate infestation, apply 1 to 3 spots of this gel bait per square yard or 10 linear feet. For heavy infestations, use 3 to 5 spots of gel bait per square yard or 10 linear feet. Each bait spot should equal about 0.5 grams or 1/4 " diameter.

For bait spots or lines:

- Remove cap from tip.
- Place tip at the surface to be treated.
- Apply light pressure to the plunger of the syringe.
- After dispensing gel, replace cap on tip.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area out of reach of children.

CONTAINER HANDLING:

If Empty: Do not reuse 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.

LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

Carefully follow the Directions for Use of this product. It is impossible to eliminate all risks associated with the use of this product. Product failure or other unintended consequences may result because of such factors as application, presence of other materials, weather, or other factors in the use of the product, which are beyond the control of Kukbo Science Co., Ltd. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Kukbo Science Co., Ltd. and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, Kukbo Science Co., Ltd. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Kukbo Science Co., Ltd., and Buyer and User assume the risk of any such use. **KUKBO SCIENCE CO., LTD. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, IT IS KUKBO SCIENCE CO., LTD. AND SELLER INTENTION THAT in no event shall Kukbo Science Co., Ltd. or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF KUKBO SCIENCE CO., LTD. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF KUKBO SCIENCE CO., LTD. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

To the extent consistent with applicable law, Kukbo Science Co., Ltd. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Kukbo Science Co., Ltd.

SUB-LABEL B: FOR USE IN RESIDENTIAL AREAS

Fipronil Bait Gel

FOR USE IN RESIDENTIAL AREAS

ACCEPTED

06/01/2021

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 88613-1

ACTIVE INGREDIENT:

Fipronil*----- 0.05%

OTHER INGREDIENTS: ----- 99.95%

TOTAL: 100.00%

**TARGET INDOOR INSECTS: AMERICAN COCKROACHES (*PERIPLANETA AMERICANA*)
GERMAN COCKROACHES (*BLATTELLA GERMANICA*)**

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 88613-1

EPA Est. No.

Manufactured By:
Kukbo Science Co., Ltd.
49 Sandandro, Heungdeok-Ku
Cheongju, South Korea

Net Wt.
Syringe 10g/Tube 20g/Syringe 35g

FIRST AID

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. • 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 poison control center or doctor for treatment advice.
If swallowed:	• 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 a poison control center or doctor. • Do not give anything by mouth to an unconscious person.

FOR MEDICAL EMERGENCY INFORMATION CALL A POISON CONTROL CENTER at 1-800-222-1222. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on this product, contact the National Pesticides Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8 AM to 12 PM PST, or at <http://npic.orst.edu>.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

Personal Protective Equipment: Applicators and other handlers must wear the following: Wear long-sleeved shirt and long pants, socks, shoes, and waterproof gloves. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to birds, fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure that wind or rain does not blow or wash pesticide off the treatment area.

PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment where possibility of shock hazard exists. Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

DIRECTIONS FOR USE

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

Use Restrictions:

- DO NOT apply bait gel to areas which have been recently sprayed with insecticides. DO NOT spray insecticide over gel as it may cause the bait to become repellent.
- DO NOT treat food preparation surfaces. Keep gel away from food contact surfaces and food items.
- DO NOT USE IN AREAS ACCESSIBLE TO CHILDREN AND PETS.
- DO NOT apply bait to surfaces where the temperature exceeds 120° F such as dishwashers, ovens, stoves, grills, fryers, coffee urns, heat lamps, toasters, and hot water pipes.
- 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 in areas exposed to direct sunlight.

If spilled, gel bait may be cleaned up with a damp paper towel or rag, or if dried, use a putty knife to scrape and discard in trash.

WHERE TO USE:

Indoors in bathrooms, kitchens, basements, laundry rooms and garages as a spot treatment, crack and crevice. Apply to openings leading to voids and hollow spaces in floors, equipment legs and bases, walls, ceilings, around plumbing pipes, windows and doors, and behind and under cabinets and appliances where listed insects are known to hide.

HOW TO APPLY [DIRECTLY FROM SYRINGE]:

For light to moderate infestation, apply 1 to 3 spots of this gel bait per square yard or 10 linear feet. For heavy infestations, use 3 to 5 spots of gel bait per square yard or 10 linear feet. Each bait spot should equal about 0.5 grams or 1/4 " diameter.

Insects prefer pressure on three sides of their body and spend 75% of their existence living in cracks and crevices. For this reason, syringe application directly in cracks and crevices will go a long way in eradicating the insect population.

For bait spots or lines:

- Remove cap from tip.
- Place tip at the surface to be treated.
- Apply light pressure to the plunger of the syringe.
- After dispensing gel, replace cap on tip.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area out of reach of children.

CONTAINER HANDLING:

If Empty: Do not reuse 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.

UNIT LABEL FOR FIPRONIL BAIT GEL Syringe
[Applicable for both commercial and residential products]

FIPRONIL BAIT GEL

Note: Do not remove this label. Use only in areas not easily accessible to children and pets.

ACTIVE INGREDIENT:

Fipronil-----0.05%

OTHER INGREDIENTS: -----99.95%

TOTAL: 100.00%

TARGET INDOOR INSECTS:AMERICAN COCKROACHES (*PERIPLANETA AMERICANA*)
GERMAN COCKROACHES (*BLATTELLA GERMANICA*)

KEEP OUT OF REACH OF CHILDREN
CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes, and waterproof gloves. Remove and wash contaminated clothing before reuse.

EPA Reg. No. 88613-1

EPA Est. No.

NET WT. X [ounces][grams] May stain textiles, fabrics and/or porous surfaces.

SEE [OUTER CARTON] [PACKAGE LABEL] FOR DIRECTIONS FOR USE, FIRST AID
AND PRECAUTIONARY STATEMENTS

[Optional Marketing Claims:]

- Satisfaction guaranteed [or your money back]
- Guaranteed to work [or your money back]
- Starts working in hours

[Use related]

- Use in cracks and crevices
- For crack and crevice
- Easy to use
- No messy residue
- Convenient [syringe] applicator
- Ready-to-use
- For use in kitchens
- For indoor use [on American and German cockroaches]
- Works inside
- For [hard to reach places] [cracks and crevices]
- Easy way to apply bait