



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 12, 2016

Mr. Zachary Colander  
Inova Chemicals, LLC  
2739 Pasadena Blvd.  
Morrisville, NC 27560

Subject: Label Amendment – Response to Agency Initiated Request –revision of product name to specify German cockroaches  
Product Name: Apex German Cockroach Bait  
EPA Registration Number: 88746-4  
Application Date: 11/17/2015  
Decision Number: 521262

Dear Mr. Colander:

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.

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

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with FIFRA section 6. If you have any questions, please contact Jacquelyn Marchese by phone at 703-347-0559, or via email at [marchese.jacquelyn@epa.gov](mailto:marchese.jacquelyn@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'VE', followed by a horizontal line extending to the right.

Venus Eagle, Product Manager 01  
Invertebrate and Vertebrate Branch 3  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# Apex German Cockroach Bait

## Active Ingredients:

Imidacloprid.....	2.15%
Other Ingredients:.....	97.85%
Total:.....	100.00%

**ACCEPTED**

Sep 12, 2016

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 88746-4

## KEEP OUT OF REACH OF CHILDREN

### CAUTION

Reg. No. 88746-4

Est. No. 88746-TX-001

Net Contents:30 Grams

#### PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals:

**CAUTION:** Causes slight skin and eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after use 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.

**Use Sites:** In and around structures, including, but not limited to, residential, multi-family, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, transport vehicles, sewers, animal rearing and handling establishments and food handling and food processing establishments.

**Indoor Use:** Results will be best if spilled food and other debris are cleaned up before applying bait. Apply bait in small spots about ¼” in diameter. Bait can also be applied in thin lines if appropriate. For most infestations, applications should range from 10 to 20 spots per 100 square feet. Use the higher number of spots when infestations are heavy and/or when roaches are living primarily in wall voids or other inaccessible areas. Smaller, more frequent spots are better than occasional large spots.

Look for areas, particularly cracks and crevices, where roaches may hide or enter buildings. Some of these areas include areas where baseboards are peeling away from the wall, cracks in and around equipment and appliances such as stoves, sinks, dishwashers, refrigerators and walk-in coolers, hollow table legs, areas where pipes come through walls, cracks between different construction elements, around electrical boxes, cracks around hinges, where cabinets meet walls and cracks leading into wall, ceiling or floor voids. Pay particular attention to cracks which lead into void areas, even small ones. Also specifically look for warm, moist areas. Around and under dishwashers, refrigerators, ice machines, sinks, tubs and toilets and around drain openings are particularly attractive areas for roaches. Insert the syringe tip directly into the crack and apply about 0.5g (pea size) amount of bait.

Do not apply bait to areas that are washed down frequently, such as in cracks around the edges of food prep surfaces. Do not apply bait in areas where there is a risk of electrical shock. Be careful not to apply bait on hot surfaces or other areas where the temperature may exceed 130 °F as the bait could melt and drip. Bait placements should be in concealed, not open areas. Do not spray insecticides or other chemicals over bait placements, as this may cause roaches not to eat the bait. Apply bait out of reach of children and pets. Inspect bait placements periodically and reapply bait as needed. Ongoing monitoring is recommended as part of an Integrated Pest Management program.

#### Food Processing and Handling Establishments, Including Federally-Inspected Food Plants:

In food areas, including serving areas while the establishment is in operation, only apply bait in cracks, crevices, and other inaccessible areas, or in tamper-resistant bait stations. Follow above directions for crack and crevice placement. Avoid contamination of food and feedstuffs. Never apply bait directly to a surface where food is stored, prepared or served. Any bait that is left visible after treatment must be washed up.

**Outdoor Use:** Apply bait on the outside surfaces of buildings and other structures, as well as in crawlspaces, attics and other voids. Porches, garages, sheds, AC units and other outbuildings, fences or walls may also need treatment. Pay particular attention to cracks where roaches may enter buildings and treat those areas. These areas include but aren't limited to cracks around windows, doors, eaves and soffits, expansion joints, and areas where lines or pipes enter buildings. Under siding and molding are also attractive areas for insects to hide. Apply bait in spots or lines as indicated for indoor baiting.

#### Storage and Disposal

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

**Pesticide Storage:** Store in a dry place. Do not store where children or animals may gain access.

**Pesticide Disposal: If empty:** Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public- private partnership.

#### Warranty Limitations and Disclaimer

To the extent consistent with applicable law, seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. To the extent consistent with applicable law, there are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. Manufacturer shall not be liable for any consequential damages based on the use of the product.