



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 7, 2020

Tyler B. Murray  
Regulatory Specialist, SciReg, Inc.  
Pest Control Insulation, LLC  
5285 Mountain Center Plaza  
Lula, GA 30554

Subject: Label Amendment – Addition of non-public health pests and update label language  
Product Name: T\*A\*P  
EPA Registration Number: 89140-1  
Application Date: 31 July 2019  
Decision Number: 554383

Dear Mr. Murray:

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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EPA Reg. No. 89140-1  
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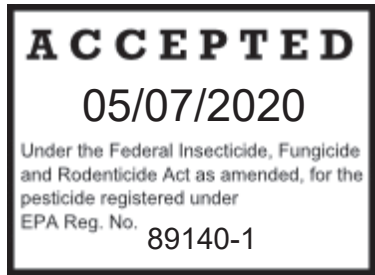
with FIFRA section 6. If you have any questions, please contact Dr. Helen Hull-Sanders by phone at 703-347-0243, or via email at [hull-sanders.helen@epa.gov](mailto:hull-sanders.helen@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is written in a cursive style with some loops and flourishes.

Elizabeth Fertich  
Product Manager 04  
Invertebrate & Vertebrate Branch 1  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure



**Brand name: T•A•P™**

**Alternate brand names: OrkinTherm Pro, OrkinTherm, BugSnipeR**

**ACTIVE INGREDIENT:**

Orthoboric acid..... 12.5%  
OTHER INGREDIENTS..... 87.5%  
TOTAL.....100.0%

**KEEP OUT OF THE REACH OF CHILDREN  
CAUTION**

See First Aid Statement [this statement optional if first aid statement not on front panel]

<b>FIRST AID</b>
<b>IF ON SKIN or CLOTHING:</b> <ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>IF IN EYES:</b> <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
Have the product container or label with you when calling a Poison Control Center or doctor, or when going for treatment.

**PRECAUTIONARY STATEMENTS:**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

**Personal Protective Equipment (PPE)**

Applicators, mixers, and other handlers must wear:

- long-sleeved shirt
- long pants
- socks, shoes
- chemical-resistant gloves
- NIOSH-approved particulate filtering facepiece respirator with any N, R, or P filter
- dust goggles

**READY-TO-USE [T•A•P™ Thermal, Acoustical, and Pest Control Insulation]** is an insect/arthropod control insulation. This product is toxic to listed insects and other arthropods and is intended to prevent their infestations in those building voids (attic, wall, between-floors, crawlspace) where the product is applied. Its toxic effect begins only after insect/arthropod contact with the product.

**KILLS:**

**Cockroaches, Termites (including Formosan Termites), Ants, Silverfish, Earwigs, Crickets, Sowbugs, Darkling Beetles, Millipedes, Centipedes, Booklice, Firebrats, Dermestids, Lady Beetles, Boxelder Bugs, Stink Bugs, Kudzu Bugs, Bat Bugs, Pillbugs, Snails, and Slugs.**

This insulation contains material toxic to these insects/arthropods and is intended to prevent new infestations in walls and attics where the product is applied. Control of insects/arthropods is limited to contact with insulation.

**DIRECTIONS FOR USE**

It is a violation of Federal law to apply this product in a manner inconsistent with its labeling. “**R**” means resistance to heat flow. The higher the **R-value** the greater the insulating power. To get the marked **R-value**, it is essential that this insulation be installed properly. Insulation applicators installing this material should be familiar with and carefully follow installation instructions from the manufacturer.

**NOT FOR USE AS SOLE PROTECTION AGAINST TERMITES. Use of this product does not substitute for pre- and/or post-construction mechanical alteration, soil treatment or foundation treatment. For active termite infestations, you should consult a licensed pest control operator.**

EASY AS 1 • 2 • 3

Attic Preparation:

- Maintain attic ventilation. Insulation should not cover any attic ventilation. Use baffles or vent chutes. Do not cover soffit vents.
- Insulation should not cover or touch heat producing components like light fixtures. Create barriers to maintain a 3” clearance.
- Create a barrier around your attic access to keep the insulation in place when entering or exiting the attic.

**FOLLOW INSTRUCTIONS FOR SET UP AND OPERATION OF BLOWING MACHINE**

[Graphics may accompany items 1 – 3 below]

1. Position Blowing Machine outside house. Plug in and attach 100’ hose.
2. Run hose to attic through nearest access. Avoid tight turns.
3. Blow insulation into attic or on top of existing insulation to desired thickness/R-Value.

[OPTIONAL statement]:

Watch our YouTube video to see how easy it is to use.

[OPTIONAL image]:

{QR Code Image}

**CAUTION! TO HELP AVOID FIRE:** Keep cellulose insulation at least three inches away from the sides of recessed light fixtures. Do not place insulation over such fixtures so as to entrap heat. Also keep this insulation away from exhaust flues of furnaces, water heaters, space heaters or other heat-producing devices unless the device is rated zero “0” clearance to combustibles. To be sure that insulation is kept away from light fixtures and flues, use a barrier to permanently maintain clearance around these areas. Check with local building or fire officials for guidance on installation and barrier requirements. Do not install or use cellulose insulation around heat or ignition sources or operations such as welding, metal cutting, grinding, or other potentially flammable situations. [or additional required FTC language]

**REQUEST TO INSTALLER:** Remove this label and give it to the consumer at completion of job.

**STORAGE AND DISPOSAL**

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

**Pesticide Storage:** Store product in a cool, dry area.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment, then offer for recycling if available or dispose of empty bag in a trash can or by incineration.

[MIN.] or [AVG.] NET WT.: \_\_\_ lbs [kg]

[For T•A•P Brand or OrkinTherm Pro]:

Manufactured for Pest Control Insulation LLC  
5285 Mountain Center Plaza Lula, GA 30554  
Tel: 770.766.6050  
www.TAPinsulation.com  
US Patent Number 6,578,782  
EPA REG. NO. 89140-1

[For OrkinTherm and BugSnipeR brands]:

Manufactured by US GreenFiber, LLC  
Toll Free 800-228-0024 www.greenfiber.com

GreenFiber is a registered trademark of US GreenFiber, LLC © 2012 US GreenFiber, LLC. All rights reserved.

US GreenFiber, LLC  
2500 Distribution Street, Suite 200  
Charlotte, NC 28203

EPA REG. NO. 89140-1

Item Code: \_\_\_\_\_  
Template Control: \_\_\_\_\_

[some or all of these locations may appear on label]:

EPA EST. NO.

Bloomer, WI 54724	EPA EST. NO. 72787-WI-001
Hickory, KY 42051	EPA EST. NO. 73840-KY-001
Webberville, MI 48892	EPA EST. NO. 73854-MI-001
Chambersburg, PA 17201	EPA EST. NO. 73864-PA-001
Eastanollee, GA 30538	EPA EST. NO. 73744-GA-001
Monroe, LA 71202	EPA EST. NO. 73755-LA-001
Houston, TX 77241	EPA EST. NO. 75642-TX-001
Chandler, AZ 85225	EPA EST. NO. 70106-AZ-002
Crothersville, IN 47229	EPA EST. NO. 86171-IN-001
Penrose, CO 81240	EPA EST. NO. 72787-CO-001
Ronda, NC 28670	EPA EST. NO. 87149-NC-001
Charlotte, NC 28206	EPA EST. NO. 70106-NC-001
Delphos, OH 45833	EPA EST. NO. 70106-OH-002
Norfolk, NE 68701	EPA EST. NO. 70106-NE-002
Tampa, FL 33605	EPA EST. NO. 70106-FL-001
Waco, TX 76704	EPA EST. NO. 70106-TX-001
West Valley, UT 84119	EPA EST. NO. 70106-UT-001
McClellan, CA 95652	EPA EST. NO. 87715-CA-001
Laflin, PA 18702	EPA EST. NO. 070106-PA-001
Bucyrus, OH 44820	EPA EST. NO. 93223-OH-001

## **[ADDITIONAL MARKETING CLAIMS AND GRAPHICS (OPTIONAL TEXT)]**

### *Thermal, Acoustical, and Pest Control Insulation*

3 - insulations - in - 1

INSULATION MADE FROM RECYCLED PAPER

- Helps protect your home environment from annoying listed insects and other arthropods\*
- Contains 87% *recycled paper*
- Helps keep you *warm* in winter & *cool* in summer
- Highly resistant to *air infiltration*
- Helps *deaden sound* as an acoustical barrier
- This *clean-blowing* insulation is the result of a patented process.
- helps prevent listed pests\*
- EXCLUSIVE FORMULA offers one time application for long-lasting protection against listed pests\* where applied
- EXCLUSIVE FORMULA helps prevent ants, cockroaches, termites, and other listed insects\* where applied
- EXCLUSIVE FORMULA does not require retreating for long-term control of ants, cockroaches, termites, and other listed insects\* where applied
- EXCLUSIVE FORMULA provides long-term control of ants, cockroaches, termites, and other listed insects\* where applied
- Provides long-lasting control of ants, cockroaches, termites, and other listed insects\* where applied
- FOR LASTING PEST PROTECTION AGAINST LISTED PESTS\* WHERE APPLIED
- FOR LONG-TERM PEST PROTECTION AGAINST LISTED PESTS\* WHERE APPLIED
- Simply blow in a minimum of \_\_\_ bags per \_\_\_\_\_ sq. ft.
- Additional bags can be used to increase R value (see reverse for additional details)
- PEST PROTECTION\* + ENERGY SAVING INSULATION
- fire resistant
- Bug Protection\* Insulation
- energy saving
- simple-to-use [GreenFiber] blower machine rentable at this store
- Can be applied over *ANY* existing insulation.
- Save up to 20% in energy costs\*\*
- Reduces Noise
- Superior Sound Deadening Properties

\* effective against cockroaches, termites (including Formosan termites), ants, silverfish, earwigs, crickets, sowbugs, darkling beetles, millipedes, centipedes, booklice, firebrats, dermestids, lady beetles, boxelder bugs, stink bugs, kudzu bugs, bat bugs, pillbugs, snails, and slugs. [NOTE TO EPA: this footnote will appear on the same panel as asterisked statements]

\*\* Savings vary. Find out why in the seller's Fact Sheet on R-values. Higher R-values mean greater insulating power.

FOR USE IN NEW CONSTRUCTION AND RETROFIT APPLICATIONS

- ATTICS • FLOORS • WALLS • CRAWLSPACES •
- OVERLAY FIBER GLASS OR OTHER INSULATIONS •

- HOMES
- APARTMENTS & CONDOMINIUMS
- OFFICES & INDUSTRIAL BUILDINGS
- HOTELS & MOTELS
- HOSPITALS & NURSING HOMES
- RESTAURANTS
- SCHOOLS

Commercial Size

Save Energy and Money!

- Helps Keep Bugs Out\* & Comfort In!
- Easy Blow In Attic Insulation
- Resists Mold
- Itch Free Insulation – No Cutting

For your Tax Credit information of up to \_\_\_\_\_ visit [[www.TAPinsulation.com](http://www.TAPinsulation.com)]  
[[www.orkintherm.com](http://www.orkintherm.com)][[www.bugsniper.com](http://www.bugsniper.com)]

{Energy Star Graphic}

{Recycle Symbol}

{PC Barcode}

{Recycled Plastic Package Graphic}

{Lifetime Guaranteed Graphic}

{Made in U.S.A. Graphic} [see p. 13 for example]

{UL Graphic}

{SCS Recycled Content Graphic}

{ORKIN logo} [see p. 13 for example]

{QR Code Symbol}

{Facebook Symbol}



{LinkedIn Symbol}

{Twitter Symbol}

{YouTube Symbol}

{GreenFiber logo} [see p. 13 for example]

{Energy Savings logo} [see p. 13 for example]

This product approved by Pest Control Insulation, LLC

MADE IN U.S.A

**[INSULATION INDUSTRY STANDARD INFORMATION (NON-FIFRA TEXT)]**

[Note to EPA: charts are completed when the bag is manufactured]

From R-\_\_ to R-\_\_\_ or higher

[or]

R\_\_\_-R\_\_\_ for attics and walls

Covers up to \_\_\_ SQ FT

[ALTERNATIVE COVERAGE CHART 1]

TAP COVERAGE CHART ([bag weight])							
[location]	R-VALUE	INSTALLED THICKNESS	COVERAGE SF/BAG	BAGS PER 1000 SF	WEIGHT LBS/SF	[additional columns/information, as needed]	

This bag covers \_\_\_ sq ft @ R-\_\_\_ where framing is \_\_\_\_\_ OC

[ALTERNATIVE COVERAGE CHART 2]

T•A•P™ COVERAGE CHART (ATTICS) BASED ON [BAG WEIGHT]											
R-Value @ 75°F	Initial Installed Thickness (in.)	Minimum Settled Thickness (in.)	Bags/ 1,000 Sq. Ft. 2"x6" Joists 16" On Ctr.	Net Coverage Sq. Ft./ Bag	Bags/ 1,000 Sq. Ft. 2"x6" Joists 24" On Ctr.	Net Coverage Sq. Ft. / Bag	Bags/ 1,000 Sq. Ft. No Joists	Net Coverage Sq. Ft. / Bag	Minimum Weight Per Sq. Ft. (Lbs.)	[additional columns/information, as necessary]	

This bag covers \_\_\_ sq ft @ R-\_\_\_ where framing is \_\_\_ OC

The listed values are based on settled thickness and can be obtained only by an insulation applicator using equipment supplied by the manufacturer and specifically designed for the product and application techniques.

R-Value (@ \_\_\_") \_\_\_\_\_

ATTIC INSTALLED DENSITY (LB/FT<sup>3</sup>) \_\_\_\_\_

[ALTERNATIVE COVERAGE CHART 3]

Application Coverage Chart							___ LBS	INS641LD
R-value at 75 F Mean Temp Valor de resistencia termica (valor R) a 75 F de temperature media	Minimum Thickness (inches) Espesor minimo (en pulgadas)		Net Coverage (No Adjustment for Framing) Cobertura neta (sin compensación para la estructura)			Gross Coverage (Based on 2"x6" Framing on 16" Centers) Cobertura neta (con compensación para una estructura de 2" x 6" en centros de 16")		
	Initial Installed Thickness Espesor inicial instalado	Settled Thickness Espesor asentado	Maximum Square Feet per Bag Pies cuadrados máximos por bolsa	Minimum Bags per 1,000 Square Feet Cantidad minima de bolsas por 1,000 pies cuadrados	Minimum Weight per Square Foot (lbs/ft <sup>2</sup> ) Peso minimo por pie cuadrado	Maximum Square Feet per Bag Pies cuadrados máximos por bolsa	Minimum Bags per 1,000 Square Feet Cantidad minima de bolsas por 1,000 pies cuadrados	

THE ABOVE COVERAGE CHART IS BASED ON A NOMINAL BAG WEIGHT OF \_\_\_ LBS. USING THE \_\_\_ BLOWING MACHINE. SETTINGS ARE NOT ADJUSTABLE. THE CHART IS BASED ON SETTLED THICKNESS AND IS FOR ESTIMATING PURPOSES ONLY. DO NOT EXCEED MAXIMUM SQUARE FEET COVERAGE PER BAG. THE APPLICATOR MUST INSTALL BOTH THE MINIMUM NUMBER OF BAGS PER \_\_\_ SQ. FT. AND THE MINIMUM INSTALLED THICKNESS TO INSURE THE STATED R-VALUE HAS BEEN REACHED. FAILURE TO MEET BOTH THESE REQUIREMENTS MAY PREVENT THE APPLICATION OF SPECIFIED R-VALUE. THIS PRODUCT MUST BE INSTALLED DRY. THE COVERAGE CHART DOES NOT APPLY TO FLOOR APPLICATIONS. DO NOT ADD WATER TO THIS PRODUCT. JOB CONDITIONS, APPLICATION TECHNIQUES, EQUIPMENT, AND SETTINGS CAN INFLUENCE ACTUAL COVERAGE. MINIMUM NET WEIGHT IS \_\_\_ LBS.

[ALTERNATIVE COVERAGE CHART 4]

Dry Dense Pack Sidewall Applications (___ pcf minimum installed density)						
Thermal Resistance (R-value)  Resistencia térmica (R)	Framing  Estructura	Installed Thickness (inches)  Espesor instalado (pulgadas)	Minimum Wt Per Square Foot (lb/ft <sup>2</sup> )  Peso mínimo por pie cuadrado lb/ft <sup>2</sup>	Maximum Coverage per Bag (no adjustment for Framing) (ft <sup>2</sup> /Bag)  Cobertura máxima por bolsa (sin compensación para la estructura) ft <sup>2</sup> /Bag	Maximum Coverage per Bag (Adjusted for Framing)  Cobertura máxima por bolsa (con compensación para la estructura)	
				16 inch o.c. (ft <sup>2</sup> /Bag)	16 inch o.c. (ft <sup>2</sup> /Bag)	24 inch o.c. (ft <sup>2</sup> /Bag)

THIS COVERAGE CHART IS FOR DRY APPLICATIONS ONLY AND IS BASED ON THE [Name of insulation blowing machine], WITH MATERIAL APPLIED DRY. FOR MAXIMUM COVERAGE PER BAG (ADJUSTED FOR FRAMING), THE FRAMING FACTOR FOR \_\_\_\_\_ OC STUD SPACING IS \_\_\_\_\_%; FOR \_\_\_\_\_ OC STUD SPACING THE FRAMING FACTOR IS \_\_\_\_\_.

[OPTIONAL TEXT]:

Follow the instructions carefully. For further information, visit our web site at [www.TAPinsulation.com][www.orkintherm.com][www.bugsniper.com]. Tested and approved to meet quality standards of the State of California Department of Consumer Affairs, Bureau of Home Furnishings and Thermal Insulation, License No. \_\_\_\_\_, Registry No. \_\_\_\_\_. The material content of T•A•P insulation consists of at least 85% recycled paper fiber. This insulation does not use asbestos, fiberglass or formaldehyde in its manufacturing process. According to T•A•P's Material Safety Data Sheet (MSDS), the application of the product requires the use of safety eyewear and a NIOSH-approved N95 or higher disposable or reusable particulate respirator if housekeeping and engineering controls do not maintain nuisance levels below regulatory limits or dust concentration is unknown. If you suffer from asthma or respiratory ailment we recommend you consult your physician prior to using this product.

This product meets the amended Consumer Product Safety Commission (CPSC) standard for flame resistance and corrosiveness of cellulose insulation.

Class 1 Building Material  
[appropriate standards to be inserted, as applicable]

Tested and approved to meet the quality standards of the State of California Department of Consumer Affairs, Bureau of Home Furnishings and Thermal Insulation, License # \_\_\_\_\_.

Testing services furnished by \_\_\_\_\_.

[WH stamp on product manufactured at GreenFiber establishments; may include following text]

US GreenFiber WH

Licensed Manufacturers:

LISTED: Cellulose Insulation

Albany, NY

Norfolk, NE

Delphos, OH

Salt Lake City, UT

Intertek

W/N 14001

or

[UL stamp on product manufactured at GreenFiber establishments; may include following text]

UL CLASSIFIED

[Note to EPA: this information is completed when the bag is manufactured]

R15890 [R27651]

Issue No. F-9706

Loose Fill

US GreenFiber, LLC [Pest Control Insulation LLC]

Classified in accordance with the following American Society for Testing and Materials (ASTM)

\_\_\_\_\_ Characteristics

Flammability Characteristics

Critical Radiant Flux: Greater Than or Equal to \_\_\_\_\_ W/cm<sup>2</sup>

Smoldering Combustion: Less Than or Equal to \_\_\_\_\_ percent

Environmental Characteristics

Corrosiveness: Acceptable

Fungi Resistance: Acceptable

Moisture Absorption: Acceptable

Odor Emission: Acceptable

Density (Settled): \_\_\_\_\_

Thermal Resistance: (\_\_\_\_\_) R/in. (at \_\_\_ in. thickness)

[ALTERNATIVE ATTIC CARD 1]:

[Note to EPA: attic cards are completed by the installer]

CUT OUT AND STAPLE IN ATTIC

ATTIC CARD: STATEMENT OF COMPLIANCE FOR LOOSE FILL INSULATION: THIS INSULATION HAS BEEN INSTALLED IN CONFORMANCE WITH THE ABOVE RECOMMENDATIONS TO PROVIDE A VALUE OF R- \_\_\_\_\_ USING \_\_\_\_\_ BAGS OF INSULATION TO COVER \_\_\_\_\_ SQUARE FEET OF AREA.

Builder's Signature \_\_\_\_\_ Company Name \_\_\_\_\_ Date \_\_\_\_\_

Installer's Name \_\_\_\_\_ Company Name \_\_\_\_\_ Date \_\_\_\_\_

[ALTERNATIVE ATTIC CARD 2]:

THIS FORM IS ONLY FOR PEST CONTROL OPERATOR USE.

CERTIFICATION

This insulation has been installed in conformance with the above recommendation, to provide a value of:

R- \_\_\_\_\_ using \_\_\_\_\_ bags of this insulation to cover \_\_\_\_\_ square feet of area.

Builder's Signature: \_\_\_\_\_

Company: \_\_\_\_\_ Date: \_\_\_\_\_

Applicator's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Company: \_\_\_\_\_ Date: \_\_\_\_\_

PCO License#: \_\_\_\_\_







