



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

April 7, 2020

Cristina Griffin  
Agent for Die, Bugs, Die! (LLC)  
Delta Analytical Corporation  
12510 Prosperity Drive Suite 160  
Silver Spring, MD 20904

Subject: Label and CSF Amendment –Revising the directions for use and addition of application material via proposed Alternate CSF1  
Product Name: Roach E. Reaper  
EPA Registration Number: 91069-2  
Application Date: 04/01/2019 (label), 06/06/2019 (CSF)  
Decision Number: 550605, 552339

Dear Ms. Griffin:

The amended label and CSFs referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are 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.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 12/17/2019
- Alternate CSF 1 dated 12/17/2019

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 with FIFRA section 6. If you have any questions, please contact Anna Briley by phone at (703) 347-0262, or via email at [briley.anna-katrina@epa.gov](mailto:briley.anna-katrina@epa.gov).

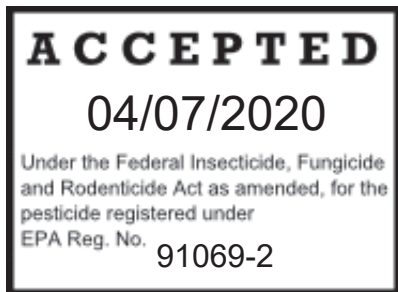
Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is cursive and somewhat stylized.

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

Enclosure

# ROACH E. REAPER



## ACTIVE INGREDIENTS

**Boric Acid** ..... 100.00%  
**TOTAL** ..... 100.00%

[Control of cockroaches.] [Not effective against flying insects, fleas, (ticks) or pest(s) like scorpions and spiders.] [Effective against certain types of ants (excluding carpenter ants, fire ants, harvester ants, and pharaoh ants).] [Not tested against other types of crawling insects]].

[Effective control of cockroaches]

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
<b>If swallowed</b>	<ul style="list-style-type: none"><li>•Have person sip a glass of water if able to swallow.</li><li>•Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>•Do not give anything by mouth to an unconscious person. 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 eye. Call a poison control center or doctor for treatment advice.</li></ul>
<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. Call a poison control center or doctor for treatment advice.</li></ul>
<b>If inhaled</b>	<ul style="list-style-type: none"><li>•Move person to fresh air.</li><li>•If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center for or doctor for treatment advice.</li></ul>
<b>Call poison control center [(1-800-222-1222)] [or (1-866-366-5048)] or doctor immediately for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</b>	

See side [or back] panel for additional precautions.

Manufactured by [for]:  
Die, Bugs, Die! (LLC)  
P.O. Box 9363  
Daytona Beach, FL 32120

NET CONTENTS: \_\_\_\_\_ ounces [Grams]  
[8 grams pure Boric Acid] [18 infused wood squares]  
[BATCH CODE \_\_\_\_\_] [May be located anywhere on label or container]

EPA Reg. No. 91069-2      EPA Est. \_\_\_\_\_  
[Alternate EPA Establishments: May be jet coded or designated in the Lot# or Batch#]

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed or inhaled. Causes moderate eye irritation. Avoid contact with 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. Remove contaminated clothing or wash before reuse.

**DIRECTIONS FOR USE**

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

**USE RESTRICTIONS:**

Apply only in areas inaccessible to children and pets.

Do not use in edible product areas of food handling establishments, restaurants or other Areas where food is commercially prepared or processed. Do not apply in serving areas while food is exposed or facility is in operation.

Food handling establishments are places other than private residences in which exposed food is held, processed, prepared or served.

Serving areas are facilities where prepared foods are served, such as dining rooms, but exclude areas where foods may be prepared or held. Do not treat surfaces likely to be contacted by food.

[Shaker bottle application method:]

To control cockroaches, certain types of ants (excluding carpenter ants, fire ants, harvesters ants and pharaoh ants), silverfish, and water bugs. SHAKE WELL, TWIST CAP UNTIL FULLY OPEN. HOLDING BOTTLE AT A 45° ANGLE, POWDER SHOULD FLOW FREELY WHEN SQUEEZED. For faster application, remove top, use spoon to distribute powder in hard to reach places. Apply liberally, scattering under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer, tubs into openings and around drains, water pipes and electrical conduits, and in cracks and crevices along baseboards and corners of cabinets, cupboards and closets. Removes all lower drawers in kitchen and bathroom cabinets, cupboards, bedroom dresser and closets, then scatter lightly liberally in drawer walls. Reapply as necessary. Any powder visible after application must be brushed into cracks and crevices or removed. Do not contaminate food and foodstuffs. Not for use in drains. This product may be used in homes, markets, schools, warehouses, factories, hospitals, hotels, garages, apartment buildings, and military bases.

[Infused wood application method:]

*[Alternate application method directions for use with honey-infused squares of wood. See graphics page for visual example of packaging]*

To minimize the amount of Boric Acid needed, and to minimize hazards associated with handling of Boric Acid, use Roach E. Reaper as directed below:

1. Use enclosed wooden stick to scoop a small, pea-sized pile of Boric Acid from the enclosed plastic container onto the top center (bottom marked "X") of one of the infused squares of wood (18 squares included). This amount of Boric Acid should cover only about  $\frac{1}{4}$  of the square.
2. Leave the Boric Acid-loaded square where cockroaches search for food, but always out of reach of children or pets. Good locations usually include beside, behind, and under kitchen appliances; under sinks; under low sitting furniture.
3. Wash hands immediately after handling the Boric Acid or the wooden squares, or wear gloves when you handle them.

This product may be used in homes, markets, schools, warehouses, factories, hospitals, hotels, garages, apartment buildings, and military bases. [Use with insect traps may improve control of cockroaches.]

## 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.

Container Handling: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

[GUARANTEE: If you use this product as directed and are not satisfied with performance, you can send a written request for a refund to the address to the address listed below. Include name of person to whom refund check should be payable, address to refund should be mailed, place of purchase, and total price paid.]

Die, Bugs, Die! (LLC)  
P.O. Box 9363  
Daytona Beach, FL 32120  
[www.diebugsdie.net](http://www.diebugsdie.net)  
[Patent Pending]

[Small Container Labeling]

{to be used on the small plastic container containing about 8 grams of Boric Acid, as part of the infused wood application method}

**ACTIVE INGREDIENTS**

**Boric Acid**..... 100.00%  
**TOTAL** ..... 100.00%

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

See [container] [box] label for precautionary statements and directions.

EPA Reg. No. 91069-2      EPA Est. \_\_\_\_

*[Optional graphics]*

{Graphics to depict alternate application method of infused squares of wood (mock-up): Small box (measuring 5.2 in x 2.0 in x 2.0 in) will contain 18 pine squares (measuring approx. 1.25 in x 1.25 in x 0.15 in) that have been infused with honey; a labeled small plastic container containing about 8 grams of pure Boric Acid in dry powder or granular form; and a 5 inch wooden stick to serve as a scooper for the Boric Acid.}

