



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 19, 2019

Jean Killoren
Agent for InCide Technologies, Inc.
Killoren Regulatory Consulting
316 Highland Ave.
Hartford, WI 53027

Subject: Registration Review Label Mitigation for Orthoboric Acid
Product Name: Incide Pest Control Insulation
EPA Registration Number: 44757-4
Application Date: 10/12/2018
Decision Number: 551679

Dear Ms. Killoren:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Boric Acid/Sodium Salts Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label 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 about this letter, please contact Jaclyn Pyne by phone at 703-347-0445, or via email at pyne.jaclyn@epa.gov.

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Sincerely,

A handwritten signature in blue ink, appearing to be "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure



| | | |
|-----------------|------------------|--------------------|
| ORTHOBORIC ACID | GROUP: 8D | INSECTICIDE |
|-----------------|------------------|--------------------|

{Black Caps, Bold face upper right corner}

InCide®
Technologies, Inc.
PEST CONTROL INSULATION

- [Contains no Asbestos, Glass Fibers or Formaldehyde
- Made from 100% Natural Fiber
- Long Lasting Protection That Is Effective Under Normal Usage And Conditions For Installed Insulation
- Odorless And Non-Corrosive
- Reduces Air Infiltration
- Excellent Thermal Insulator
- Patented Flame Retardant
- Superior Sound Barrier
- Easy To Install
- For Use In New Construction Retrofit Application In Attics, Sidewalls And Crawl Spaces:
 - Houses
 - Apartments
 - Offices
 - Hospitals
 - Restaurants
 - Schools
 - Hotels
 - Food Processing Plants
 - Authorized By The USDA For Use In Federally Inspected Meat And Poultry Plants
- KILLS Cockroaches, Ants, Drywood Termites, Subterranean Termites, Silverfish, Earwigs, Crickets, Sowbugs, Millipedes, Centipedes, And Booklice]

ACTIVE INGREDIENTS:

| | |
|--------------------------|---------------|
| Orthoboric Acid..... | 14.72% |
| OTHER INGREDIENTS: | <u>85.28%</u> |
| TOTAL..... | 100.00% |

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

[See back [side] panel for additional Precautionary Statements]

[Incide® Pest Control Insulation is a ready to use insect control insulation. This product is toxic to listed insects and is intended to prevent their infestation in those building voids (walls, attic, under floor) where the product is applied. Is works [becomes effective] after the insect contact with the product.]

[Savings vary: find out why in the seller's fact sheet on R-Values.]
It is essential that this insulation be installed properly, if you do it [install the insulation] yourself get instructions from the Insulation Blower Machine manufacturer_and follow them carefully. Instructions do not come with this package.

PRECAUTIONARY STATEMENTS:

HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid breathing dust. During installation, wear a protective respirator. To avoid eye and skin irritation, wear protective goggles and gloves. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear long-sleeve shirt, long pants, shoes and socks. When using pressurized equipment to load and apply dust products to structural building components wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any N, R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any N, R or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters.

FIRST AID:

| | |
|--|--|
| If Swallowed: | <ul style="list-style-type: none"> • Call a poison control center or doctor immediately 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. |
| If on Skin or Clothing: | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice. |
| If Inhaled: | <ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, Call 911 or an ambulance, the give artificial respiration, preferably mouth to mouth if possible. • Call a poison control center or doctor for further treatment advice. |
| If in Eyes: | <ul style="list-style-type: none"> • 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 eye. Call a poison control center or doctor for treatment advice |
| <p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, for additional information call (800) 424-9300 or (800) 777-4569.</p> | |

{Note: Space permitting the First Aid statements will be in grid format; otherwise a paragraph format will be used.}

DIRECTIONS FOR USE:

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

For new construction and retrofit applications in attics, sidewalls and crawl spaces, apply InCide Pest Control Insulation (this product) into structural voids.

RESTRICTIONS

- Use of this product for control of bed bugs is prohibited.
- Applications to carpets are prohibited.

RESISTANCE MANAGEMENT RECOMMENDATIONS:

For resistance management, Pest Control Insulation [this product] contains a Group 8D insecticide. Any ant population may contain individuals naturally resistant to Pest Control Insulation [this product] and other Group 8D insecticides. The resistant individuals may dominate the insect population if this group of insecticides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed. Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, consult with your local university specialist or certified pest control advisor.

COCKROACHES, ANTS, SILVERFISH EARWIGS, CRICKETS, SOW BUGS, MILLIPEDES, AND BOOKLICE: This insulation is fused with material toxic to these insects and intended to prevent their infestation in walls and attics where this product is applied. Control of insects is limited to contact with this insulation.

DRYWOOD AND SUBTERRANEAN TERMITES: This insulation will protect wooden construction elements that are covered with insulation from drywood and subterranean termite infestations. This insulation is fused with material toxic to these insects and is intended to prevent new drywood and subterranean termite infestations in attics, sidewalls, and crawlspaces cavities where the product is applied. Protection from drywood and subterranean termites is limited to wood in direct contact with the insulation.

NOT FOR USE AS A SOLE PROTECTION AGAINST TERMITES. Use of this product is designed to complement and enhance pre and/or post construction mechanical alteration, soil treatment or foundation treatment, but not to replace. For active termite infestations, you should consult a licensed pest control operator.

CAUTION

TO HELP AVOID FIRE: Keep 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 insulation away from exhaust flues or furnaces, water heaters, space heaters, or other heat-producing devices. To be sure that insulation is kept away from light fixtures and flues, use a barrier to permanently maintain clearance around these items. Check with the local building or fire officials for guidance on installation and barrier requirements.

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

{for any product requiring a respirator and containing directions for use which includes Non-WPS Use sites}

Respirator fit testing, medical qualification, and training

Using a program that conforms to OSHA's requirements (see 29 CFR Part 1910.134), employers must verify that any handler who uses a respirator is:

- Fit-tested and fit-checked,
- Trained, and
- Examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn. A qualified medical practitioner is a physician or other licensed health care professional who will evaluate the ability of a worker to wear a respirator. The initial evaluation consists of a questionnaire that asks about medical conditions (such as a heart condition) that would be problematic for respirator use. If concerns are identified, then additional evaluations, such as a physical exam, might be necessary. The initial evaluation must be done before respirator use begins. Handlers must be reexamined by a qualified medical practitioner if their health status or respirator style or use-conditions change.
- Upon request by local/state/federal/tribal enforcement personnel, employers must provide documentation demonstrating how they have complied with these requirements.

PESTICIDE STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage or disposal. Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **If empty:** do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency [or 1800-CLEANUP which is managed as a public-private partnership].

COVERAGE CHART

| | | | | | |
|--|--|----------------------|---|--|----------------------------------|
| [THIS IS A NATURAL FIBER-BASE LOOSE FILL INSULATION The manufacturer recommends the following coverage. "R" means resistance to heat flow. The higher the R-Value, the greater the insulation power. Rated "R: value is per inch. Weight per bag _____ lbs. Net* | | | | | |
| *only the appropriate package size will be displayed on the label. [5.65 lb.] [8.48 lb] [9.17 lb] [13.76 lb] [20.0 lb] [25.0 lb] [26.0 lb] [30.0 lb] [33.0 lb] or [40.0 lb] | | | | | |
| Horizontal Open Blow, Walls, Joists | | | | | |
| R-VALUE AT 75° MEAN TEMPERATURE | INITIALLY INSTALLED THICKNESS (Approximate) | MINIMUM THICKNESS | MAXIMUM NET COVERAGE No Framing | MAXIMUM GROSS COVERAGE 2 nd Framing on 16" Centers | Minimum weight per Sq. Ft. |

All text in brackets [xxx] is optional & may or may not be included on a printed label.

All text italicized in curly brackets {xxx} is for informational purposes only

| To Obtain Insulation resistance (R) of: | | Installed Insulation should not be less than (inches) | Maximum Sq. Ft. Coverage Per bag | Bags per 100 Sq. ft. | Maximum sq. Ft. Coverage Per bag | Bags per 1000 sq. ft. | Weight per sq. ft of stalled should be no less than (lbs.) |
|---|--|---|----------------------------------|----------------------|----------------------------------|-----------------------|--|
| R-11 | | | | | | | |
| R-13 | | | | | | | |
| R-19 | | | | | | | |
| R-21 | | | | | | | |
| R-22 | | | | | | | |
| R-24 | | | | | | | |
| R-30 | | | | | | | |
| R-32 | | | | | | | |
| R-36 | | | | | | | |
| R-38 | | | | | | | |
| R-40 | | | | | | | |
| R-49 | | | | | | | |
| R-45 | | | | | | | |
| R-50 | | | | | | | |
| R-60 | | | | | | | |

To get the Marked R-Value it is essential that this insulation be installed properly. Coverage is based upon installation using a pneumatic blowing machine. Settled density ___ lbs./cubic ft. Above calculation are based on settled density [except side wall applications]. Actual coverage may vary depending on applicator technique and equipment. Installed thickness will vary depending upon conditions at the time of installation. This chart is for guidance only. Product must be installed at the cover rates shown to obtain the listed R-value. When installing this product, you must follow the recommendations of the manufacturer according to this coverage chart. Initial installed thicknesses were determined in accordance with ASTM C1374 using a KRENDL model 2000 machine.]

{Information and details listed on the above chart will vary, per manufacturer.}

ATTENTION

THIS PRODUCT MEETS THE AMENDED CPSC STANDARD FOR THE FLAME RESISTANCE AND CORROSIVENESS OF CELLULOSE INSULATION

CPSC Standard HH-1-515E; 15 CFR Sections 1209, 1404

[Naturally Sustainable

Made with 100% Borate Fire Retardants

No ammonium compounds used

According to Idaho Power, approximately 50% Renewable Energy is used during the production of the In-Cide Cellulose Insulation.]

{Independent laboratory certification will be added to label. (i.e. R&D Services or Underwriter)}

Mfg. by:
InCide Technologies
50 N. 41st Ave.
Phoenix, AZ. 85009

EPA Reg No.: 44757-4
EPA Est. No.:
Batch Code:

[items in brackets are optional text]