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Systems Integration Group, Inc.

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JUN - 1 1999

Mr. John Hebert
Jellinek, Schwartz, & Connolly, Inc.
1525 Wilson Blvd.
Suite 600
Arlington, VA 22209

Dear Mr. Hebert:

Subject: Amended Labeling
Talstar Insect & Termite Killer
EPA Registration No. 279-3169
Your Submission Dated November 30, 1998

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Add the following statement, prominently displayed, to the front panel beneath the product name: "FOR OUTDOOR, HOMEOWNER USE ONLY". Following the statement, "Do not use inside dwellings" add, "For Use Around Existing Structures, Not for Pre-Construction Use."
2. Delete the first sentence under **SUBTERRANEAN TERMITES - OUTDOORS**. This claim suggests 100% control which is not acceptable. You may replace the claim with "Aids in prevention of subterranean termite infestations" or "Kills and controls subterranean termites." Also, revise the first sentence of the paragraph below the listing of use sites on the front panel to read as follows: "Kills and controls ants, termites, and certain wood destroying insects."
3. You have two sets of mixing instructions. The paragraph beneath the heading "Mixing Instructions" lists only the 0.06% emulsion. We recommend you replace this paragraph with the instructions appearing in the third paragraph under the heading "Pest Control on Outside Surfaces and Around Buildings."
4. Change "firewood piles" on the front panel to "wood piles". Also, to the wood pile and stored lumber paragraph under the heading "Treatment For Wood Destroying Pests (Outdoors)", add the following restriction: "Treated wood can be burned or used for lumber one month after treatment."
5. Under the heading "Treatment For Wood Destroying Pests (Outdoors)", delete the instructions for drilling and use of crack and crevice injector. These instructions are for commercial applicators only. Likewise, homeowners are not likely to have equipment such as a crack and crevice injector.
6. Delete "by sub-surface injection" under "Fence Posts". Homeowners are not likely to have equipment for subsurface injection.

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- 7. Either delete the lawn pest section or give appropriate mixing and application instructions.
- 8. Revise the heading "Subterranean Termites - Outdoors", to read, "Subterranean Termites - For Outdoor Post-Construction Use Only".
- 9. Revise the first paragraph under "Subterranean Termites" to read as follows: "Chemicals for soil treatment are used to establish a barrier against termites. The chemical emulsion must be adequately dispersed in the soil to provide a barrier between the wood in the structure and the termite colonies in the soil. Barriers may be established in the soil on the outside perimeter of the house by trenching using a rate of 4 gallons of emulsion per 10 linear feet per foot of depth. A complete termite barrier may require treatment with another EPA registered product to the inside perimeter of the foundation and to other interior critical areas. For these situations contact a licensed pest control operator for treatment. Do not use under slabs, in crawl spaces, or indoors. If termites are found within the house or structure, contact a licensed pest control operator for treatment."
- 10. Under mixing instructions, in parentheses following the first sentence add: "[4 fl. oz. (8 tablespoons) to 4 gallons of water for each 10 linear feet]."
- 11. Revise the poured concrete and brick and block foundations instructions to read as follows: "Remove all wood debris and wood forms. Around piers, chimney bases and along foundations of poured concrete, dig a trench 6 inches wide and 4 inches deep. For brick and block foundations, dig the trench about 12 inches deep. If footing is more than 12 inches deep, make holes with a crowbar, pipe or steel rod about 1 foot apart that extend from the bottom of the trench to the top of the footing. Make holes closer in hard packed clay soils. NEVER DIG BELOW THE TOP OF THE FOOTING. Apply the diluted solution (emulsion) in the trench at a rate of 4 gallons per 10 linear feet per foot of depth. Apply half of this to the backfill as the trench is refilled."

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

If you have any questions regarding this letter, please contact John Leahy of my team at (703) 305-6703.

Sincerely,

George T. LaRocca
 Product Manager 13
 Insecticide Branch
 Registration Division (7505C)

Enclosures

Code 1671

Net Contents



Insect & Termite Killer

For Use Around Foundations, Outside Buildings, Lawns, Woodpiles, Stored Lumber and Fence Posts

For prevention and control of ants, termites (above ground only), and certain wood destroying insects. This product can be used for treatment of localized areas of wooden structures, firewood piles and stored lumber to control wood infesting borers, carpenter ants and carpenter bees. In addition, controls many common pests in lawns and other outdoor areas around the home.

DO NOT USE INSIDE DWELLINGS

EPA Reg. No. 279-3169

EPA Est. 279-

Active Ingredient:

By Wt.

Bifenthrin* 7.9%

Other Ingredients: 92.1%

100.0%

Talstar® Soil Insect & Termite Killer contains 2/3 pound active ingredient per gallon.

*Cis isomers 97% minimum, trans isomers 3% maximum. U.S. Patent No. 4,238,505

KEEP OUT OF REACH OF CHILDREN

CAUTION

See other panels for additional precautionary information.

FIRST AID

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

Note to Physician:

This product is a pyrethroid. If large amounts have been ingested, the stomach and intestine should be evacuated. Treatment is symptomatic and supportive. Digestible fats, oils, or alcohol may increase absorption and so should be avoided.

For Emergency Assistance Call: (800) 331-3148



FMC Corporation Agricultural Products Group Philadelphia PA 19103

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Need to add statement #1 from addendum to PMA 96-7

OUTDOOR USE ONLY [Tree Icon]

CONTROLS: Ants, Subterranean Termites, Wood Borers, Carpenter Ants, Fleas, Ticks, Spiders, Scorpions, and Many Other Soil Insects and Home Invading Pests

PRECAUTIONARY STATEMENTS

Hazards to Humans (and Domestic Animals)

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing dust (vapor or spray mist).

Environmental Hazards

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters. Care should be used when spraying to avoid fish and reptile pets in/around ornamental ponds.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow to drift to blooming crops if bees are visiting the treatment area.

DIRECTIONS FOR USE

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

Do not apply this product through any kind of irrigation system.

Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place, preferably in a locked storage area and avoid excess heat. Carefully open containers. After partial use replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers.

Product Disposal: Partially filled plastic bottle - Securely wrap original plastic bottle in several layers of newspaper and put in trash.

Container Disposal: Do not reuse empty plastic bottle. Wrap plastic bottle and put in trash.

ACCEPTED with COMMENTS in EPA Letter Dated

JUN - 1 1999

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 279-3169

General Applications Instructions

Talstar® Insect & Termite Killer formulation mixes readily with water and may be applied using various types of spray equipment.

Mixing instructions: For 0.06% emulsion, mix 1fl.oz. Talstar® Insect & Termite Killer per gallon of water (1fl.oz. = 2 tablespoons). Do not use household utensils to measure Talstar® Insect & Termite Killer.

Home Invading Pests (Outside Dwelling)

Ants, Bees, Beetles (1), Box Elder Bugs, Carpenter Ants (1), Carpenter Bees (1), Centipedes, Clover Mites, Cockroaches, Crickets, Earwigs, Elm Leaf Beetles, Fleas, Flies, Hornets, House Flies, Millipedes, Mosquitoes, Scorpions (2), Silverfish, Sowbugs, Spiders, Springtails, Ticks, Wasps, Yellowjackets.

NOTE: Number in parenthesis refer to Specific Directions. (1) For added information, see section on Treatment For Wood Destroying Pests. (2) For Scorpions, remove accumulations of lumber, firewood, and other materials which serve as harborage sites and treat beneath and adjacent to infested areas

Pest Control on Outside Surfaces and Around Buildings

For control of Ants, Bees, Biting Flies, Boxelder Bugs, Centipedes, Cockroaches, Crickets, Earwigs, Elm Leaf Beetles, Firebrats, Fleas, Flies, Millipedes, Mosquitoes, Pillbugs, Silverfish, Sowbugs, Spiders, Ticks, and Wasps.

Apply Talstar® Insect & Termite Killer using a 0.03 to 0.06% emulsion as a residual spray to outside surfaces of buildings including, but not limited to, exterior siding, foundations, porches, window frames, eaves, patios, garages, refuse dumps, lawns such as grass areas adjacent or around private homes, duplexes, townhouses, condominiums, house trailers, apartment complexes, carports, garages, fence lines, storage sheds, barns, and other residential and non-commercial structures, so long as they are not woody ornamentals and other areas where pests congregate or have been seen.

For 0.03% emulsion, mix 0.5 fluid oz. of Talstar® Insect & Termite Killer per gallon of water. For 0.06% emulsion, mix 1 fluid oz. Talstar® Insect & Termite Killer per gallon of water (1 fluid oz. = 2 tablespoons). Do not use household utensils to measure Talstar® Insect & Termite Killer. Use the higher rate for heavy pest infestation, quicker knockdown or longer residual control. Repeat treatment as necessary to maintain effectiveness.

Perimeter Treatment: Apply to a band of soil and vegetation 6 to 10 feet wide around and adjacent to the structure. Also, treat the foundation of the structure to a height of 2 to 3 feet. Use a spray volume of 2 to 10 gallons of emulsion per 1000 square feet. Higher volumes of water may be needed if mulch or leaf litter is present or foliage is dense. House siding may be treated if pests such as Gypsy Moth adults and caterpillars, Boxelder Bugs, Elm Leaf Beetles, Earwigs or Silverfish are present.

Treatment For Wood Destroying Pests (Outdoors)

Localized Areas Outdoors: For the control of insects such as termites, ants, carpenter ants, and wood-infesting beetles such as Old House Borer and Powder Post in localized areas of infested wood around structures, apply a 0.06% emulsion to voids and galleries in damaged wood and in spaces between wooden members of a structure and between wood and foundations where wood is vulnerable. Paint on or spray applications may also be used. Application may be made to inaccessible areas by drilling, and then injecting emulsion with a crack and crevice injector into the damaged wood or void spaces. This type of application is not intended to be a substitute for soil treatment, mechanical alteration or fumigation to control extensive infestation of wood-infesting insects.

For wood piles and stored lumber apply a 0.06% emulsion. Use a hose-end sprayer or sprinkling can to deliver a coarse drenching spray. Do not use in structures

Subterranean Termites - Outdoors

Prevents subterranean termite infestations. For outdoor, homeowner post construction use only. Do not use under slabs, in crawl spaces or indoors. If termites are found within the house or structure, contact a licensed pest control operator for treatment.

Important: Do not treat structures that contain cisterns or wells. Soil in the vicinity of wells, cisterns or ponds should not be treated. For those situations, contact your County Cooperative Extension Agent or consult a commercial pest control service.

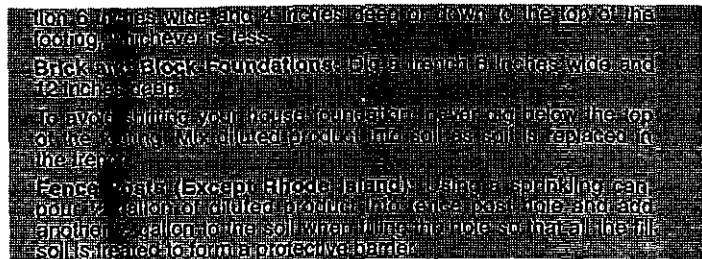
Do not treat soil that is water saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur. Do not apply while it is raining.

Mixing Instructions: Using a sprinkling can. Add 1 fl.oz. (2 tablespoons) to 1 gallon of water for each 2.5 linear feet. One quart of Talstar Insect & Termite Killer will make 32 gallons of diluted solution and treat/cover 80 linear feet.

Trench Treatment

Remove all wood debris and wood forms.

Poured Concrete Foundations: Dig a trench next to the founda-



Fence Posts - Termite Prevention

Create an insecticidal barrier in the soil around wooden constructions such as signs, fences and landscape ornamentation by applying a 0.06% emulsion.

Previously installed poles and posts may be treated by sub-surface injection or treated by gravity-flow through holes made from the bottom of a trench around the pole or post. Treat on all sides to create a continuous insecticidal barrier around the pole. Use 1 gallon of emulsion per foot of depth for poles and posts less than six inches in diameter. For larger poles, use 1.5 gallons of emulsion per foot of depth. Apply to a depth of 6 inches below the bottom of the wood. For larger constructions, use 4 gallons per 10 linear feet per foot of depth.

When to Re-apply

Reapplication for subterranean termites should only be made when there has been a disruption of the chemical barrier in the soil due to construction, excavation, landslides, etc. Reapplication should be made as a spot treatment to those areas. Annual reapplication of the entire premises must be avoided.

For Ant and Fire Ant Mounds use Talstar® Insect & Termite Killer 0.06% emulsion as Drench Method:

Apply 1-2 gallons of emulsion to each mound area by sprinkling the mound until it is wet and treat a 4 foot diameter circle around the mound. Use the higher volume for mounds larger than 12". For best results, apply in cool weather, such as in early morning or late evening hours, but not in the heat of the day. Treat new mounds as they appear.

Lawn Pests

Armyworm, Lawn Moth Larvae (Sod Webworms), Dichondra Flea Beetles, Chinchbugs, Cutworms, ~~European Crane Fly (Larvae)~~, ~~Fiery Skipper Larvae (California and Hawaii only)~~, ~~Tropical Grass Webworms (Hawaii only)~~, Grasshoppers, Chiggers, Clover Mites, Earwigs, Fleas

Attention:

Keep children and pets off treated areas following application until the area has dried.

Do not use on vegetables or food crops.

Do not treat pets with this product.

Do not spray inside dwellings.

NOTE: Mosquitoes outdoors coming to rest on areas treated for the control of lawn and home invading pests will be killed for varying periods of time after treatment, depending on exposure of treated areas to weathering conditions.

Dealers Should Sell in Original Packages Only

Terms of Sale or Use: On purchase of this product buyer, and user agree to the following conditions:

Warranty: FMC makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Except as so warranted, the product is sold as is. Buyer and user assume all risk of use and/or handling and/or storage of this material when such use and/or handling and/or storage is contrary to label instructions.

Use of Product: FMC's recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice.

Damages: Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid and shall not include incidental or consequential damages.

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involves total control