



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 17, 2016

Mr. Craig A. Gordon  
Vice-President  
HomeGuard Distributors, Inc.  
12597 Ulmerton Road  
Largo, FL 33774

Subject: Notification per PRN 98-10 – Addition of Various Master Label Updates  
Product Name: TRUTH™ TERMITE BAIT  
EPA Registration Number: 75313-2  
Application Date: October 6, 2015  
Decision Number: 510784

Dear Mr. Gordon:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

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If you have any questions, please contact Mr. Carmen J. Rodia, Jr. by phone at (703) 306-0327, or via email at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Gebken', written in a cursive style.

Richard Gebken  
Product Manager 10  
Invertebrate & Vertebrate Branch 2  
Office of Pesticide Programs

*Enclosure: Updated Master Label Stamped "Accepted," dated March 17, 2016*

**NOTIFICATION**

75313-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

03/17/2016

**TRUTH™ TERMITE BAIT**

**Active Ingredient:**

Diflubenzuron

N-[[[4-chlorophenyl) amino]carbonyl]-2, 6-difluorobenzamide.....0.25%

**Other Ingredients:** .....99.75%

**Total:** .....100.00%

Contains 0.25 g rams of diflubenzuron per 100 grams of formulation

**Important: Before buying or using this product, read the entire label including the “Warranty Disclaimer,” “Inherent Risks of Use” and “Limitation of Remedies” sections of this label. If terms are not acceptable, return the unopened product container at once. Use this product only according to label directions.**

**Keep Out of Reach of Children**

**CAUTION**

**PRECAUTIONARY STATEMENTS**

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Do not place TRUTH™ TERMITE BAIT in any area where, because of the movement of water, it could be washed into a body of water containing aquatic life, such as ponds or streams.

**HomeGuard Distributors, Inc.**

**12597 Ulmerton Road**

**Largo, FL 33774**

EPA Reg. No.: 75313-2

EPA Est. No.: 79714-CHN-001

Net Weight:

Batch Code:

## **DIRECTIONS FOR USE**

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

Read the General Information and General Use Directions carefully before using. Some states have more restrictive requirements regarding qualification of person(s) using this product. Consult the structural pest control regulatory agency of your state prior to use of this product. TRUTH™ TERMITE BAIT is a part of the HOMEGUARD SUBTERRANEAN TERMITE BAITING SYSTEM. Contact HomeGuard Distributors, Inc. at (727) 595-3502 for assistance using TRUTH™ TERMITE BAIT or any other components of the HOMEGUARD SUBTERRANEAN TERMITE BAITING SYSTEM.

### **General Information**

TRUTH™ TERMITE BAIT is intended for use in an ongoing program of management and control of subterranean termite colonies around and under any type of building or other object (structure). TRUTH™ TERMITE BAIT does not exclude termites from a structure. Instead, it suppresses or eliminates termite colonies. TRUTH™ TERMITE BAIT affects termite colonies that present an existing or potential hazard to the structure may, subject to limitations stated herein, protect the structure against subterranean termite attack.

The active ingredient in TRUTH™ TERMITE BAIT, diflubenzuron, is an insect development inhibitor. When consumed by a termite, diflubenzuron impairs the ability of a termite to molt. Molting is the process by which termites, at certain points in their development, shed their existing exoskeleton and form a replacement exoskeleton. Termites that attempt to molt after ingesting an amount of TRUTH™ TERMITE BAIT sufficient to impair their molting process either die or are incapacitated by their inability to complete the molting process. Insect development inhibitors such as diflubenzuron are characterized as slow acting toxicants; however their action is slow only to the extent that they affect a termite only at the points in its life cycle when it molts. Because all termites in a colony do not molt at the same time, the effect of diflubenzuron on the colony as a whole is progressive. This progressive effect is one of the key attributes of diflubenzuron as a termite colony toxicant.

Sufficient consumption of TRUTH™ TERMITE BAIT by a termite colony can cause a decline in the number of members of the colony. Such a decline, if sustained by continued consumption of TRUTH™ TERMITE BAIT by the colony, can significantly impair the vitality of the colony. Further, continued consumption of TRUTH™ TERMITE BAIT by remaining colony members may ultimately result in the total elimination of the colony. The extent of the decline of the colony, the speed of its decline and the possibility of its elimination depends upon the extent to which TRUTH™ TERMITE BAIT is made continuously available to a colony for consumption and the extent to which members of the colony consume it. Close adherence to the General Use Directions can increase the likelihood of colony elimination; however conditions or circumstances beyond the control of the user may prevent or substantially delay colony elimination. Such conditions may include, but are not limited to, alternate non-bait food sources that reduce the extent to which the colony depends on TRUTH™ TERMITE BAIT as a food source, excess moisture, low or high temperatures or abandonment of feeding on the bait by the colony.

Interception is the process by which termite activity is established at a location prior to the application of TRUTH™ TERMITE BAIT at that location. Once they are intercepted, termites can normally be induced to consume TRUTH™ TERMITE BAIT. These intercepted termites then guide other colony members back to the interception location where they also consume TRUTH™ TERMITE BAIT. The addition of moisture to TRUTH™ TERMITE BAIT can, under certain conditions, enhance the acceptance of TRUTH™ TERMITE BAIT by termites.

Termite colonies are intercepted and baited by placing TRUTH™ TERMITE BAIT in the ground and, depending on the circumstances, above ground. In ground, the TRUTH™ TERMITE BAIT is buried in or placed in contact with the ground around or under structures to be protected. Above ground, the TRUTH™ TERMITE BAIT is placed inside an above ground Termite Monitoring Device.

Termites are intercepted within in ground monitors with interceptors that are placed inside the monitors, but are accessible to termite attack through the perforations or an opening in the monitor's bottom. Interceptors are a nontoxic, cellulose containing substance readily consumed by subterranean termites. The interceptors provide a pre-baiting food source for

termites that, upon being fed on by termites, establishes termite activity within the monitors. After interception of a termite colony within an in ground monitor, the TRUTH™ TERMITE BAIT is made continuously available for colony consumption by placing TRUTH™ TERMITE BAIT in the ground and replenishing consumed amounts of TRUTH™ TERMITE BAIT for as long as termite activity is present.

After termite activity has been absent from a baited in ground monitor for at least sixty days, the interception process is resumed by replacing the TRUTH™ TERMITE BAIT monitor with a new interceptor monitor.

In order to affect as many of the termites as possible that currently or could potentially infest a structure, every termite colony that inhabits the ground under and around the structure must be intercepted and baited with TRUTH™ TERMITE BAIT. If the cycle of interception and baiting around a structure is interrupted or discontinued, new colonies occupying the territory of eliminated colonies, existing colonies that were suppressed but not eliminated or existing colonies never intercepted may forage at points of possible entry into and infest the structure. For this reason, the cycle of interception and baiting should continue for as long as it is desirable to exclude subterranean termites from the structure.

If a conventional termite liquid barrier treatment is performed in conjunction with an installation of TRUTH™ TERMITE BAIT, care must be taken not to treat in the area of installed monitors (preferably not within two feet of monitors). Do not treat in areas of installed monitors during routine pesticide applications.

Preventative critical area soil or wood treatments may be performed in conjunction with monitor installation. Because the use of TRUTH™ TERMITE BAIT is a multistep process, localized supplemental treatment(s) or areas of the structure infested with active termites at the time of monitor installation, using barrier or contact type termiticides, may provide more immediate control of termites in those parts of the structure than TRUTH™ TERMITE BAIT.

### **General Use Directions**

#### **Preconstruction Use**

TRUTH™ TERMITE BAIT can be used for preventative treatment (before signs of infestation) of structures under construction or newly completed (as a substitute for and in lieu of preconstruction soil treatment). Place monitors around the outside of the structure only after the final exterior grade is installed (and preferably after landscaping is completed).

**Preconstruction Use: “DO NOT USE AS A PREVENTATIVE TREATMENT FOR NEW CONSTRUCTION IN FLORIDA or ARIZONA.”**

#### **Postconstruction Use**

TRUTH™ TERMITE BAIT can be used for remedial treatment of infested existing structures or for preventative treatment (before signs of infestation) of existing structures.

### **ABOVE GROUND USE OF TRUTH™ TERMITE BAIT**

#### **Above Ground Monitors Installation and Initial Baiting**

Moisten TRUTH™ TERMITE BAIT before installing it in the monitors, by adding non-chlorinated water to the inside of the TRUTH™ TERMITE BAIT. The termite access openings in the monitor should be positioned flush with a surface close to or on which evidence of an active termite infestation is located. Use only within guidelines and directions of the above ground monitor used.

#### **Above Ground Inspection and Rebaiting of the TRUTH™ TERMITE BAIT**

To inspect a TRUTH™ TERMITE BAIT, examine the interior of the monitor for active termites, carefully probe through bottom access openings of the TRUTH™ TERMITE BAIT if necessary. If live termites are present in the TRUTH™ TERMITE BAIT and consumption of TRUTH™ TERMITE BAIT is sufficient to warrant rebaiting removed the consumed TRUTH™ TERMITE BAIT and add new TRUTH™ TERMITE BAIT. Inspections are to be made within guidelines and directions of the above ground monitor used.

## **IN GROUND USE OF TRUTH™ TERMITE BAIT**

### **In Ground Monitor Location Selection**

To reduce the potential for tampering with and disturbance of monitors, points of monitor installation should be chosen that, where possible, minimize installed monitor visibility. Areas where barrier type termiticides may have been previously applied, such as within two feet of the foundation wall, should be avoided if possible.

Install monitors at or near points of known or suspected termite entry into the structure. If a point of accessible ground is not located within ten feet of a point of known termite entry (due to an intervening hardened construction surface such as a concrete slab), it may be advisable to create an access to the ground through that surface close to the point of known entry and install a monitor at that access.

Install monitors at or preferably within five feet of point of known, probable or suspected termite foraging and at other critical areas. Such areas may include areas with concentrations of cellulose-containing debris, such as mulch or wood scraps, in contact with the ground, areas of moderate soil moisture, shaded areas, areas containing plant root systems, bath traps, visible termite foraging tubes, etc.

Install monitors around a structure such that, except where sufficient access to the ground is not available, the maximum interval between two adjacent monitors does not exceed twenty feet. If the distance between two points of accessible ground around the structure exceeds thirty feet, it may be advisable to form one or more openings in the surface creating the inaccessibility to facilitate monitoring between those points.

If the structure has an accessible crawl space, monitors can be installed in the crawl space in lieu of or in addition to installing monitors around the structure. Monitors can be installed within a slab structure at existing or created openings in the slab surface through which ground is accessible and into which a monitor can be installed in a secure manner.

Once termite interception has occurred at a monitor and bait consumption has begun, it may be advisable, depending on the rate of bait consumption in that monitor and nearby monitors, to locate one or more supplemental monitors in the immediate vicinity of the infested monitor(s) in order that bait consumption by the colony be maximized.

If termites have not been present in a monitor for at least approximately sixty days, remove any remaining bait (clean out monitor) and replace the interceptors. If termites have abandoned the monitor possibly due to reductions in termite activity related to low temperatures during the period of predicted limited termite activity (see below), it may be advisable to leave the monitor in place and recheck the monitor after the period of predicted limited termite activity has elapsed before removing the monitor. If termites have abandoned the monitor possibly due to excessive moisture, it may be advisable to remove the saturated bait (clean out monitor) and rebait at that time or after the excessive moisture condition has abated.

If a monitor, upon repeated inspection, is found to contain excess moisture (water standing at the bottom of the monitor or cavity, etc.), it may be advisable to relocate the monitor, if possible, to a nearby area where the soil is better drained or alternately, modify the monitors location to prevent water from collecting in the monitor by, for example, creating a sump area under an installed monitor or at the bottom of the cavity.

### **In Ground Bait Monitor Installation**

To install a monitor, excavate or form a hole in the ground approximately the same size and dimensions as those of the monitor. Insert the monitor into the hole. Maximizing contact between the exterior of the monitor and the earth during installation will increase the probability of termite interception within the monitor.

### **Inspecting a Monitor Before First Use of TRUTH™ TERMITE BAIT**

Visually examine the interceptors for the presence of termites, being careful to minimize disturbance of the interceptors. If termites are present, bait according to “First Use of TRUTH™ TERMITE BAIT.” If termites are not present, further inspections will be needed.

### **First Use of TRUTH™ TERMITE BAIT**

Optionally, moisten TRUTH™ TERMITE BAIT before installing by adding non-chlorinated water to the inside of the TRUTH™ TERMITE BAIT. Optionally, place TRUTH™ TERMITE BAIT (whether or not it has been moistened) in areas within two feet of the foundation wall, in areas of infestation, if possible.

### **Inspecting and Replacing a Previously Baited TRUTH™ TERMITE BAIT**

To inspect a monitor, visually examine the interior of the monitor for active termites, carefully probing the TRUTH™ TERMITE BAIT if necessary. If live termites are present in the monitor and sufficient consumption of TRUTH™ TERMITE BAIT has occurred to warrant replacing, remove the old monitor and replace the monitor with a new TRUTH™ TERMITE BAIT.

### **Scheduling TRUTH™ TERMITE BAIT Inspections**

The length of time between TRUTH™ TERMITE BAIT inspections is dependent upon the type of TRUTH™ TERMITE BAIT station used:

#### **In Ground station**

If termite activity is known to be present in the structure at the time of first use of TRUTH™ TERMITE BAIT, inspect all baited In Ground stations, three times, at approximately 30, 60 and 90 days after the date of completion of initial TRUTH™ TERMITE BAIT installation. Additional inspection times can be added if needed. If no termite activity is present in the structure at the time of first use of TRUTH™ TERMITE BAIT, inspect all In Ground stations for the first time within approximately 90 days after the date of completion of initial TRUTH™ TERMITE BAIT installation. Thereafter, inspect any In Ground station that does not contain TRUTH™ TERMITE BAIT within approximately 90 days after the date of the last inspection of that In Ground station. Inspect a newly baited In Ground station two times at approximately 30 and 60 days after the date of initial TRUTH™ TERMITE BAIT installation. Thereafter, as long as the In Ground station continues to contain TRUTH™ TERMITE BAIT, inspect the In Ground station within approximately 45 days of the date of the last inspection of the In Ground station.

#### **Above Ground station**

If termite activity is known to be present in the structure at the time of first use of TRUTH™ TERMITE BAIT, inspect all Above Ground stations two times, at approximately 45 and 90 days after the date of completion of initial Above Ground station installation. If no termite activity is present in the structure at the time of first use of TRUTH™ TERMITE BAIT, inspect all Above Ground stations for the first time within approximately 90 days after the date of completion of initial Above Ground station installation. Thereafter, inspect any installed Above Ground stations within approximately 90 days after the date of the last inspection of the Above Ground stations.

### **Adjustments to In Ground Monitor Inspection Scheduling**

Decreases in elapsed time between inspections of a baited monitor may be warranted if consumption of all the bait in the monitor occurs during the interval between any two inspections.

Because subterranean termites are cold-blooded (poikilothermic) animals, low temperatures can substantially reduce or stop their activity close to the earth's surface during a certain period of the year. For this reason, if the temperature falls low enough, termites may cease to feed in monitors or the onset of feeding in monitors may be delayed until temperatures have recovered above a certain level for a long enough period of time. Reductions in termite activity that are the result of low temperatures may make inspections of monitors unnecessary for as long as low temperatures prevail in the area.

The temperature at which termite activity is substantially curtailed may vary significantly between different geographic areas and with different species of termites. However, generally speaking, termite activity will be reduced in the monitors during those times of the year during which the average daily mean exterior air temperature is below 50°F. For this reason, the following rule may be applied when counting the number of elapsed days between inspections unless, in the opinion of the operator, increases in the elapsed time between inspections are unwarranted based on local circumstances.

In counting the number of days between inspections, exclude from the total number of days elapsed since the last inspection any days whose date falls between the first date in the fall/winter that long term climate data predicts that the mean exterior air temperature for that date at that application site will be below 50°F (begin period of predicted limited activity) and the first date in the winter/spring that the climate data predicts that the average mean exterior air temperature

for that date at that application site will be above 50°F (end period of predicted limited activity). However, under no circumstances should more than six months elapse between inspections of monitors. Climate data used should be for the National Weather Service reporting station closest to the application site.

#### **STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store in original container in a dry storage area out of reach of children and animals.

**PESTICIDE DISPOSAL:** Product not disposed of by use according to label directions should be wrapped in paper and placed in a trash can.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place container in a trash can.

#### **Warranty Disclaimer**

HomeGuard Distributors, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions for use, subject to the inherent risks set forth below. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, HOMEGUARD DISTRIBUTORS, INC. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.**

#### **Inherent Risks of Use**

It is impossible to eliminate all risks associated with the use of this product. Lack of performance or other unintended consequences may result because of factors such as use of the product contrary to the label directions, adverse conditions (such as unfavorable temperatures, soil conditions, excessive rainfall, etc.), abnormal conditions (such as drought, tornadoes, hurricanes, earthquakes, etc.), presence of other materials, the manner of application or other factors, all of which are beyond the control of HomeGuard Distributors, Inc. or the seller. All such risks shall be assumed by the Buyer and User.

#### **Limitation of Remedies**

The exclusive remedy for losses and damages resulting from the use of this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at HomeGuard Distributors, Inc.'s election, one of the following:

- 1) Refund of purchase price paid by buyer or user for product bought, or
- 2) Replacement of amount of product used

HomeGuard Distributors, Inc. shall not be liable for losses or damages resulting from handling or use of this product unless HomeGuard Distributors, Inc. is promptly notified of such loss or damage in writing. In no case shall HomeGuard Distributors, Inc. be liable for consequential or incidental damages or losses even if HomeGuard Distributors, Inc. knew of, was advised of or should have been aware of the possibility of such damages.

The terms of the "Warranty Disclaimer" above and this "Limitation of Remedies" cannot be varied by any written or verbal statements or agreements. No employee or sales agent of HomeGuard Distributors, Inc. or the seller is authorized to vary or exceed the terms of the "Warranty Disclaimer" or this "Limitation of Remedies" in any manner.