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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Dr. Robert E. M. Wurz
Novartis Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419-8300

Dear Dr. Wurz:

Subject: Amendment of Confidential Statement of Formula, Labeling
Amendments/Removal of Use Sites, and Change of Basic Product Name
Clinch Ant Bait (formerly Affirm Fire Ant Insecticide)
EPA Registration No. 100-894
Your Submissions Dated May 13, 1998; July 29, 1998; and October 22, 1998.

The revised Confidential Statement of Formula (CSF), labeling amendments, and change in the basic product name referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable provided you address the following comments prior to release for shipment of product bearing the amended labeling:

1. Provide information regarding the effect of the variance of the certified limits of the active ingredient on the efficacy of the product given the labeled application rates.
2. Make the following labeling changes:
 - a. In the Agricultural Use Requirements box, change the PPE listed under the first bullet from "Long-sleeved shirt and long pants" to "Coveralls".
 - b. In the Non-Agricultural Use Requirements box, revise the last sentence to read: "Do not re-enter or allow others to enter treated areas until application is complete and dusts have settled."

CONCURRENCES

SYMBOL	SURNAME	DATE					

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Please 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.

Sincerely,

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

Enclosure

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Clinch™

ANT BAIT

To control fire ants in citrus, almonds, walnuts, potatoes, around barns and equipment, and around chicken houses

Active Ingredient:

Abamectin (CAS No. 65195-56-4 and No. 65195-55-3)0.011%*

Other Ingredients: 99.989%

Total: 100.000%

*1 lb. of Clinch contains 50 mg abamectin

EPA Reg. No. 100-894

EPA Est. No. 39578-TX-1^(A)

EPA Est. 499-MO-1^(W)

EPA Est. 5905-GA-1^(H)

EPA Est. 67545-AZ-1^(G)

(Superscript is first letter of lot number on bag)

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use on back of bag.

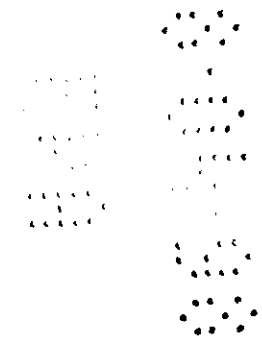
NCP 894A-L1B 0398

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 17 1998

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

100-894



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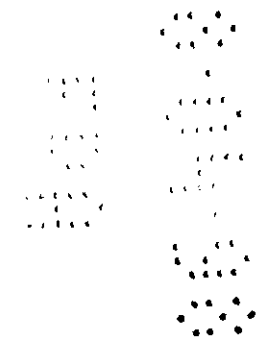
DIRECTIONS FOR USE AND CONDITIONS OF SALE AND WARRANTY

IMPORTANT: Read the entire **Directions for Use** and the **Conditions of Sale and Warranty** before using this product. If terms are not acceptable, return the unopened product container at once.

CONDITIONS OF SALE AND WARRANTY

The **Directions for Use** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of Novartis Crop Protection, Inc. or the Seller. All such risks shall be assumed by the Buyer.

Novartis warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions for Use** subject to the inherent risks referred to above. **Novartis makes no other express or implied warranty of Fitness or Merchantability or any other express or implied warranty. In no case shall Novartis or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product.** Novartis and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing **Conditions of Sale and Warranty**, which may be varied only by agreement in writing signed by a duly authorized representative of Novartis.



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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 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

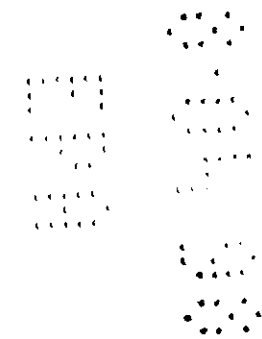
AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes with socks



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NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not re-enter treated areas until application is complete.

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR INSECT CONTROL, CROP INJURY, OR ILLEGAL RESIDUES.

GENERAL INFORMATION

Where to Use

To control fire ants in citrus, almonds, walnuts, potato, around barns and equipment, and around chicken houses.

How Clinch Works

Clinch controls fire ants with two modes of action. First, Clinch is a stomach insecticide which slowly kills ants after they ingest the bait. This slow action is important because it allows Clinch to be passed by the worker ants throughout the colony and eventually to the queen. The second mode of action works directly on the queen; after the queen ingests Clinch, viable egg production ceases. The combined affect of these dual modes of action is elimination of the ant colony.

When to Apply

Apply when ants are actively foraging [typically when soil temperatures are greater than 60°F (15°C)] or consult your state agricultural experiment station or state extension service for optimum timing of application. In cases where reinfestation occurs or when very large mounds remain active, retreatment may be desirable after 3-4 months. Apply after dew or rainfall has dried for maximum effectiveness. For best results, do not apply if rainfall is anticipated within 4-6 hours after application.

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Note: Allow 7-10 days after applying Clinch before using a contact insecticide. This allows worker ants time to distribute bait throughout the colony.

How to Apply

Broadcast Application – Apply one pound of Clinch per acre (1 lb./A) using properly calibrated ground equipment to assure proper dosage and uniform distribution.

Individual Mound Treatment – For best results, use 5-7 tablespoons of Clinch per mound. Sprinkle the bait uniformly in a circle around the base of the mound, out to a distance of approximately 2-4 feet. Do not apply directly to the top of the mound or disturb the ant mound. Do not contaminate kitchen utensils with this product.

Precautions: Do not use in pastures or rangeland grazed by cattle, sheep, or other domestic animals (including horses). Do not use on croplands, except citrus, almonds, walnuts, potatoes and outdoor ornamental nurseries. Do not allow livestock to graze treated citrus, almonds, walnuts, or potatoes. Do not use around chicken houses where birds are allowed outdoor range.

STORAGE AND DISPOSAL

General

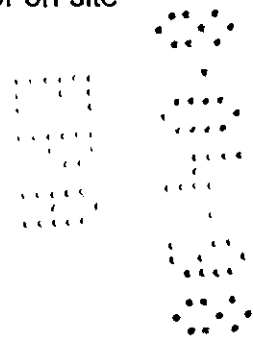
Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Consult federal, state, or local disposal authorities for approved alternative procedures.

Storage Instructions

Clinch may be an attractant to rodents and domestic animals. Store in a cool, secure, dry place. To maintain maximum effectiveness, close container tightly after each use and use within 5 months after opening.

Pesticide Disposal

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.



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Container Disposal

Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed or absorbed through the skin. Avoid breathing dust. Avoid contact with eyes, skin, and clothing. Wash thoroughly after handling.

Statement of Practical Treatment

If swallowed: Call a physician or Poison Control Center. Give 1 or 2 glasses of water and immediately induce vomiting by gently touching back of throat with finger or administer syrup of ipecac. Do not give anything by mouth to an unconscious person. Get medical attention.

If on skin: Remove contaminated clothing and wash affected areas with soap and water.

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

For 24-hour emergency information, call 1-800-888-8372.

Personal Protective Equipment

Applicators and other handlers must wear:

- long-sleeved shirt and long pants
- waterproof gloves
- shoes with socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Environmental Hazards

This pesticide is toxic to fish and wildlife. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the

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mean high water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

Clinch™ trademark of Novartis
U.S. Patent No. 4,310,519

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Novartis Crop Protection, Inc.
Greensboro, North Carolina 27419

NCP 894A-L1B 0398

[QUARK/CLINCH/CLINCH] - ccg - 7/27/98

