

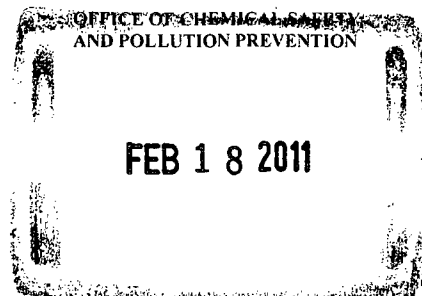
190-1174

02-18-2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Ms. Patsy Laird
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Ms. Laird:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated February 4, 2011 for the following product(s):

Impasse™ Termite Bait

Reg. No. 100-1174


The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98-10 and finds that the label change(s) requested falls within the scope of PRN 2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact Linda A. DeLuise at 703-305-5428.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Gebken".

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7504P)

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <hr/> Notification
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Application for Pesticide - Section I

1. Company/Product Number 100-1174	2. EPA Product Manager Mark Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Impasse Termite Bait	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Syngenta Crop Protection, LLC P. O. Box 18300 Greensboro, NC 27419 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical to a pesticide already registered and its labeling to: EPA Reg. No. FEB 18 2011 Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of label change per PR Notice 2007-4. This Notification is consistent with the guidance of PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§156.10, 156.140, 156.144 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Syngenta is amending the Storage and Disposal section of the label by Notification according to the directions stated in PR Notice 2007-4.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
*Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other <u>Pressure Sensitive</u>	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Patsy Laird	Title Regulatory Label Specialist	Telephone No. (Include Area Code) 336-632-5927	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Patsy Laird</i>	3. Title Regulatory Label Specialist		
4. Typed name Patsy Laird	5. Date February 4, 2011		

Certification with Respect to Label Integrity

Version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
100-1174	2/4/2011	000100-01174.20110204.IMPASSE_NOTIF_FEB2011.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Patsy Laird

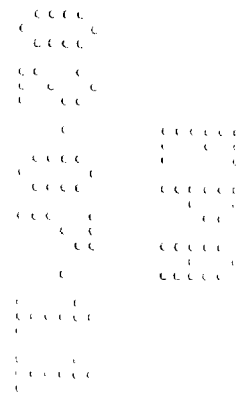
February 4, 2011

Signature

Date

Patsy Laird
Name (typed)

Regulatory Label Specialist
Title



FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Do not give any liquid to the person.• Do not induce vomiting unless told to do so by the 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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call 1-800-888-8372	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Personal Protective Equipment (PPE)

Formulators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks and shoes

User Safety Recommendations After Bait Use:

- Wash hands thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet.

DIRECTIONS FOR USE

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

Read entire label before using this product.

For use by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulations of your state prior to use of this product.

GENERAL PRECAUTIONS

Do not use, handle or tamper with bait container in a manner inconsistent with this label.

Do not apply this product in a way that will cause exposure to people or pets. **Do not** place bait into soil that is water saturated or frozen.

Locate heating/air conditioning ducts, air vents, plumbing pipes, drainage systems, sewer lines and electrical lines/conduits before drilling holes for termite trap placement. Caution must be taken to avoid puncturing and contaminating water lines or drainage systems.

Do not contaminate public and private water supplies, water, food, or feed by storage or disposal.

GENERAL INFORMATION

Impasse Termite Bait, when used as recommended in this label provides effective control or population suppression of subterranean termites, including species of *Reticulitermes*, *Heterotermes*, and *Coptotermes*. Impasse Termite Bait is a ready-to-use formulation composed of a cellulose bait matrix treated with 1,500 ppm (0.15%) lufenuron, a slow-acting, insect growth regulator. Impasse interferes with the termite's molting process, and as a result, termites are killed. Due to the normal food exchange among termites, individuals that have fed on Impasse Termite Bait distribute the treated bait to other termites in the colony. Control of termites in structures may require 1-4 months or more, depending on weather, moisture, levels of termite activity, termite species and time of year.

Impasse Termite Bait is designed to be used as a tool in integrated management of termites in and around structures and can be used as a means to control active infestations of termites in structures, or to reduce populations of termites in areas surrounding structures. Suppression of termite populations around structures with

Permitted Sites

Impasse Termite Bait can be deployed in below-ground delivery systems to control termites in a wide range of termite-infested materials in and around structures. Permitted sites of use include but are not limited to houses, apartment buildings, industrial buildings, laboratories, and non-food/feed areas of stores, warehouses, schools, nursing homes, hospitals, restaurants, hotels, churches, food manufacturing, processing and service establishments. Impasse Termite Bait can be used to control local infestations of termites that occur in materials such as (but not limited to): structural wood products, posts, wood beams, roofs, building siding, foam insulation, or caulked joints and interior and exterior planters, decking, utility poles, fences, or situations such as (but not limited to): slab, basement or crawl space foundations, rubble foundations, masonry voids, manhole covers, electrical systems, attics, underground cabling, basements, porches, crawlspaces, sheds, and garages.

For the purposes of using this label, a housing unit is a single family dwelling (single home or townhouse). A garage, whether attached or detached, is considered part of the unit.

INSTRUCTIONS-FOR USE

General Use Patterns

Pre-Construction Use: Impasse Termite Bait may be used as a preventive termite control method for new construction in lieu of other termite control methods, such as a soil-applied termiticide. Stations should be placed around a structure using the guidelines for placement provided in the section on **Placement of Monitoring or Baiting Stations**. Stations should be installed after the final grade around exterior of the structure is prepared, typically after landscaping has been completed.

Post-Construction Use: Impasse Termite Bait may be used to control existing infestations in and around structures, or as a preventive method to reduce populations of termites in areas around structures.

Direct Baiting: Impasse Termite Bait may be placed directly into bait stations without first monitoring for termites. This method may be used for either pre-construction or post-construction uses where termite activity is suspected. Direct baiting may reduce the time required for termite colonies to acquire lethal amounts of Impasse, therefore may reduce the time needed to control termite populations. Direct baiting may also reduce delays in termite control associated with disruption of termite activity when baiting is preceded by monitoring. Follow instructions in the section **Placement of Monitoring or Baiting Stations** to install stations, then fill with Impasse Termite Bait.

Baiting With Monitoring Program: Impasse Termite Bait may be deployed in conjunction with a pre-baiting monitoring program, whereby monitoring stations are

loaded with a monitoring tube/cartridge. Once termites are found feeding on blank monitoring tubes/cartridges, Impasse Termite Bait Tubes containing Impasse are used to replace the monitoring tubes/cartridges in stations.

Timing and details of the monitoring programs should be appropriate to the level of termite activity, presence of termite-conducive conditions, and time of year. [Optional language: For best results use Syngenta termite monitoring/baiting stations to deploy Impasse Termite Bait.] Deployment of stations and bait should be done around the perimeter of the structure, and around areas in the yard or landscape area where termites are likely to occur.

As a means to reducing vicinity termite populations and thereby reducing the risk of structural attack by subterranean termites, a monitoring/baiting program may be used in areas adjacent to uninfested structures. Using termite monitoring/baiting techniques, a program of termite monitoring and bait deployment can be used to detect and treat populations of termites. Termite population reduction measures work best when combined with a soil treatment with a liquid termiticide, or use of other termite prevention technologies [Optional language: e.g., Impasse Termite Blocker.]

Placement of Monitoring or Baiting Stations

Monitoring stations must be monitored at least once every three months until bait has been deployed. Proper placement and maintenance of monitoring stations prior to deployment of Impasse Termite Bait is critical to successful management of termites using this system. The bait must be ingested by termites to provide control. The time required to gain control is dependent on how rapidly termites find and feed upon the bait. In general, baits should be deployed in locations around structures where conditions are conducive to termites. Areas at corners of structures near downspouts or areas with decaying wood materials that are near the structure are considered good locations for bait stations. Where such conducive conditions are not readily identified, bait stations should be placed outside the dripline of the roof, approximately 2-3 feet from the structure, and placed at intervals of approximately 10 feet. However, numbers and spacing of monitors should be adjusted based on local conditions. Stations may also be placed around areas in the yard or landscape area where termites are likely to forage. Such termite conducive areas in the home landscape include but are not limited to: decaying trees, shrubs or tree stumps, wood piles or ornamental beds with bark mulch. Continued monitoring of termites around the structure is strongly recommended since termite activity (different termite populations or different termite species) may return to the same or different sites in or around the structure over time.

Around individual residential structures or apartments, use enough bait stations to deploy Impasse Termite Bait to all areas of termite activity. Generally, 10-20 bait stations are adequate for most housing units.

Bait stations can be deployed in accessible crawl spaces, either in addition to stations placed around the perimeter of the structure, or instead of perimeter-installed stations.

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Bait Station Inspection and Servicing Instructions

Stations should be monitored at least once every three months until bait has been deployed. Once the station is loaded with Impasse Termite Bait, recheck bait supply at least every 3 months. However, when used in areas with high levels of termite activity, more frequent servicing may be required to prevent depletion of the bait supply. When baiting active termite infestations, it is important to maintain supply of Impasse Termite Bait at all times to ensure that sufficient amount of Impasse is provided to the colony. The frequency of inspection should be adjusted according to termite species, foraging pressure and climatic conditions. Treatment of *Coptotermes* (Formosan) termites may require servicing of stations on a more frequent basis than for other subterranean termites. Continue providing bait until activity ceases. Once activity in the baited station has been eliminated, wait at least 2 months and then remove the Impasse Termite Bait and resume the termite monitoring schedule as described above.

Minimize disturbance of termites during all phases of Impasse Termite Bait treatment. This will promote normal foraging by termites and ensure adequate transfer of the bait toxicant to the termite colony. Replace bait if termites have consumed over 50% of the bait within a station. It may be desirable to provide auxiliary stations to increase the amount of bait in the immediate vicinity of heavy termite activity. The additional amount of bait available to the colony should hasten control. Generally, these auxiliary bait stations should be placed within 12 inches of the stations found to have termites, or as close as is practically feasible.

In some cases, heavy populations of termites feeding in structures may warrant a partial treatment with a contact termiticide to limit termite damage while Impasse Termite Bait has sufficient time to work. Partial treatments may not be permitted in some states, so consult state and local regulations before making a partial or spot treatment of termiticide.

Inspection Interval Adjustments

In colder climates where soil temperatures may drop below 50° F, termite foraging and associated activity in monitoring or baiting stations may cease. During these periods of termite inactivity, it may be suitable to increase the interval of inspection to more than 3 months, but in no case should the inspection interval be greater than 4 months. However, the effects of soil temperature and moisture on termite foraging varies by termite species, geographic location, exact placement of stations around a structure, and various other environmental factors. Other conditions such as frozen or water-saturated soil, or normal seasonal decline in subterranean termite foraging may also support a lengthened inspection schedule. Therefore, local conditions and species targeted should be strongly considered before extending the length of the inspection schedule.

Permitted Sites

Impasse Termite Bait can be deployed in above-ground delivery systems to control termites in a wide range of termite-infested materials in and around structures. Permitted sites of use include but are not limited to houses, apartment buildings, industrial buildings, laboratories, and non-food/feed areas of stores, warehouses, schools, nursing homes, hospitals, restaurants, hotels, churches, food manufacturing, processing and service establishments. Impasse Termite Bait can be used to control local infestations of termites that occur in materials such as (but not limited to): structural wood products, posts, wood beams, roofs, building siding, foam insulation, or caulked joints and interior and exterior planters, decking, utility poles, fences or trees or situations such as (but not limited to): slab, basement or crawl space foundations, rubble foundations, masonry voids, manhole covers, electrical systems, attics, underground cabling, basements, porches, crawlspaces, sheds, and garages.

For the purposes of using this label, a housing unit is a single family dwelling (single home or townhouse). A garage, whether attached or detached, is considered part of the unit.

INSTRUCTIONS-FOR USE

General Considerations

Impasse Termite Bait is used above-ground when termites are known or suspected to be actively infesting the structure and areas of above-ground termite infestation in the structure can be identified and are accessible. Compatible above-ground bait delivery stations may be used to provide direct access of Impasse Termite Bait to foraging termites in structures or other above-ground areas with termites. Termite activity indoors can be controlled by first locating termite mud tubes, then placing Impasse Termite Bait in a manner so that termites will be diverted from the mud tubes onto the station containing the termite bait. Once installed, receptacles loaded Impasse Termite Bait should remain in place as long as termites are actively feeding on the bait material.

Placement of Bait Receptacles

Position termite bait receptacles in areas of the structure near or in contact with known or suspected termite activity. Examples of such termite activity include inhabited termite mud tubes on structural elements and evidence of active termite infestations within the structure.

Installation of Above-Ground Bait Receptacles

Install bait stations in a manner to minimize disturbance of foraging termites, and place in locations where stations are not likely to be disturbed. Above-ground delivery stations should be attached securely to the infested surface, so that the station access

