100-1257 04-29-2010 1/13

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

April 29, 2010

Thomas J. Parshley, Reg. Prod. Mgr.
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419

Subject: Label Amendment—based on conditional response application
Product Name: Lufenuron Termite Bait
EPA Reg. No.: 100-1257
Application Dated: October 1, 2007
Decision Number: 384720

Dear Mr. Parshley:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following label revision provisions:

1. Based on the toxicity classifications for both the oral and dermal exposure routes, the following FIRST AID statement must be added to the precautionary statements.

"**FIRST AID**

If swallowed: 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: 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."

2. Add the following statement to the first line of the "Placement of Monitoring or Baiting Stations" statement on page 7:

"Monitoring stations must be monitored at least once every three months until bait has been deployed."

3. Delete the first sentence of the "Bait Station Inspection and Servicing Instructions" statement on page 8.

A copy of the label stamped "accepted with comments" is enclosed for your records. You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Clayton Myers at (703) 347-8874 or myers.clayton@epa.gov.

Sincerely,

Mark Suarez, Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure
Stamped Label

Lufenuron Termite Bait

A termite bait for use in integrated management systems for protection of structures from termites

For Use by Professional Pest Control Operators in Commercial, Industrial, Institutional and Residential Areas.

Active Ingredient:	
Lufenuron,N-[2,5-dichloro-4-(1,1,2,3,3,3-hexafluoropropoxy)-phenylaminocarbonyl]-2,6-difluorobenzamide	0.15%
Other Ingredients:	99.85%
Total:	100.00%

Lufenuron Termite Bait is a cellulose-based bait matrix that contains 0.15% by weight of the insect growth regulator Lufenuron.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle (If you do not understand this label, find someone to explain it to you in detail).

EPA Reg. 100-1257

EPA Est. XXXXX

Product of XXXX
Formulated in XXXX

SCP 1257A-M(draft)

Net contents

ACCEPTED
With COMMENTS
In EPA Letter Dated:
APR 29 2010
Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:
100 - 1257

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.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

Syngenta warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law, (1) This warranty does not extend to the use of this product contrary to label instructions, or under conditions not reasonably foreseeable to or beyond the control of Seller or Syngenta, and (2) Buyer and User assume the risk of any such use. TO THE EXTENT PERMITTED BY APPLICABLE LAW, SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.

To the extent permitted by applicable law, in no event shall SYNGENTA be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Syngenta and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and of Liability, which may not be modified except by written agreement signed by a duly authorized representative of Syngenta.

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

Lufenuron 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*. Lufenuron 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. Lufenuron 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 Lufenuron 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.

Lufenuron 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

(Label language for all Lufenuron Termite Bait uses)

Lufenuron Termite Bait is intended to reduce the overall risk of attack and damage by termites to the structure.

Integrated management of termites may include the deployment of multiple tactics designed to avoid or eliminate termites, including the elimination of termite-conducive conditions, use of bait or liquid termiticides, or other methods. Choice of appropriate procedures should include consideration of such variables as the location of termites in and around the structure, the design of the structure, soil type, soil compaction, grade conditions, water table, and location and type of domestic water supplies and drainage systems. Effective termite control should include elimination of termite access to moisture by recommending repair of faulty construction grade and/or plumbing, and removal of all wood and cellulose containing debris in contact with soil from crawl spaces, porches, and around foundations.

Knowledge of the biology and behavior of the termite species involved, and the extent of the infestation will help to ensure successful control. Treatment requirements for subterranean termite control may vary due to state and local regulations, company policy, soil type, construction practices and other factors. For advice concerning current termite control regulations under local conditions, consult your State structural pest control regulatory agency or your State Cooperative Extension Service.

Permitted Sites

Lufenuron 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. Lufenuron 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: Lufenuron 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: Lufenuron 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: Lufenuron 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 lufenuron, 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 Lufenuron Termite Bait.

Baiting With Monitoring Program: Lufenuron 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, Lufenuron Termite Bait Tubes containing lufenuron 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 Lufenuron 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

Proper placement and maintenance of monitoring stations prior to deployment of Lufenuron 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 Lufenuron 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.

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 Lufenuron 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 Lufenuron Termite Bait at all times to ensure that sufficient amount of Lufenuron 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 Lufenuron Termite Bait and resume the termite monitoring schedule as described above.

Minimize disturbance of termites during all phases of Lufenuron 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 Lufenuron 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

Lufenuron 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. Lufenuron 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

Lufenuron 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 Lufenuron 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 Lufenuron 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 Lufenuron 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

openings are positioned over mud tubes. Slightly moisten the Lufenuron Termite Bait with water before loading into the bait station. Seal areas around the loaded station so that the inside part of the delivery station is exposed to minimal light or air-flow.

Inspection and Servicing of Bait Receptacles

After installation, bait receptacles loaded with Lufenuron Termite Bait must be inspected at 2-4 week intervals, depending on the level of termite activity. If live termites are present in the receptacle and more than 50% of the bait has been consumed, refill the receptacle with Lufenuron Termite Bait. The Lufenuron Termite Bait receptacle can be removed, if termite feeding has not been observed for two consecutive monitoring periods. Once Lufenuron Termite Bait receptacles have been removed, periodic inspections of the structure for renewed termite activity are recommended.

Use in Food Handling Establishments

Lufenuron Termite Bait may be used in non-food areas of restaurants, food processing plants, food warehouses, grocery stores and supermarkets, schools, office buildings, apartments, hotels or motels, hospitals, commercial and industrial buildings or manufacturing facilities.

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STORAGE AND DISPOSAL

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

Storage

Store unused product in original container in a dry storage area, out of reach of children and animals.

Container Disposal

Place empty container in a trashcan.

Pesticide Disposal

Product not disposed of by use according to label directions should be wrapped in paper and placed in a trashcan.

For non-emergency (e.g., current product information) call
Syngenta Crop Protection at 1-800-334-9481.

Manufactured for:
Syngenta Crop Protection, Inc.
P.O. box 18300
Greensboro, North Carolina 27419-8300
www.syngenta-us.com

SCP 1257A-M(draft)