

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 19, 2015

Mark Mongiovi Senoret Chemical Co. 69 N. Locust Street P.O. Box 327 Lititz, PA 17543

Subject: Notification per PRN 98-10 – Adding alternate brand names and duplicating previously accepted marketing claims and graphics to each brand as well as other minor revisions
Product Name: Terro Ant Killer II
EPA Registration Number: 149-8
Application Date: 6/8/2015
Decision Number: 505824

Dear Mr. Mongiovi:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (RN) 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.

The following alternate brand names have been added to the product record:

- 1. Terro Outdoor Liquid Ant Bait Stake Bonus Pack
- 2. Terro Mini Liquid Ant Baits
- 3. Terro Mini Liquid Ant Bait Stations
- 4. Terro Outdoor Liquid Ant Bait Stakes Value Pack

If you have any questions, you may contact Autumn Metzger at 703-305-5314 or at Metzger.autumn@epa.gov.

Sincerely,

Jennifer Urbanski PhD, Product Manager 04 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs EPA Reg. No. 149-8 Notification of Label Action – Alternate Brand Names, Packaging & Related Labeling, Graphics & Symbols, Other Minor Revisions June 8, 2015 Page 1 of 13 **NOTIFICATION**

[MASTER LABEL – COVER PAGE]

TERRO® ANT KILLER II

For Control of Sweet Eating Ants

[Alternate Brand Names]

TERRO® Outdoor Liquid Ant Baits TERRO® Ant Killer_{II} Liquid Ant Baits TERRO® Outdoor Liquid Ant Bait Stakes TERRO® Outdoor Liquid Ant Stakes TERRO® Ant Killer_{II} Liquid Ant Baits Bonus Pack TERRO® 5.4 TERRO®.Comm TERRO® Outdoor Liquid Ant Bait Stakes Bonus Pack

Disclaimer to Be Used with Above Brand Names(*)

*PCO refers to commercial size packaging and is not meant to indicate product strength

[Optional Marketing Claims]

Liquid ant bait Contains Borax Use Indoors Liquid Ant Killer Liquid Ant Bait Solution 5.4% Concentrate saves time and money Kills the ants you see and the ants you don't Attracts and kills all common household ants Do it yourself liquid bait system No unpleasant odors Use Outdoors Hate em Bait em Attracts Ants Fast Indoor/Outdoor [Protection]

ACTIVE INGREDIENT:

Sodium Tetraborate Decahydrate (Borax)	5.40%
OTHER INGREDIENTS:	<u>94.60%</u>
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

NET CONTENTS:

[____Bait Stations _____Bait Stakes ____fl. oz. (___ml) / ____fl. oz. (___ml) each]

SENORET CHEMICAL CO., INC. 69 NORTH LOCUST STREET LITITZ, PA 17543

Phone: (24 hour emergency): 1-800-800-1819 www.Terro.com Terro® is a registered trademark of Senoret Chemical Company, Inc.

EPA Reg. No. 149-8

EPA Est. No. 47629-PA-001

149-8

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:

06/19/2015

TERRO® PCO_{II}* Liquid Ant Bait TERRO® PCO* Liquid Ant Killer TERRO® PCO* Liquid Ant Killer Bait TERRO® PCO* Liquid Ant Bait Station TERRO® PCO* Liquid Ant Killer Bait Station TERRO® Mini Liquid Ant Baits TERRO® Mini Liquid Ant Bait Stations TERRO® Outdoor Liquid Ant Bait Stakes Value Pack

[MASTER LABEL – BACK PANEL PAGE 1 OF 3]

DIRECTIONS FOR USE

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

FOR USE IN AND AROUND: Homes, Hospitals, Restaurants, Apartments, Grocery Stores, Institutional Buildings, Schools, Cafeterias, Warehouses, Storage Areas, Food Processing Plants, Mobile Homes, Boats, Military Bases, Theaters, Nursing Homes, and on Military, Commercial, and Cruise Ships.

ATTRACTS AND KILLS ALL COMMON HOUSEHOLD ANTS INCLUDING: Argentine ants, Ghost ants, Cornfield ants, Pavement ants, Acrobat ants, White footed ants, Little black ants, Odorous house ants, Crazy ants, Big headed ants, and other sweet eating ants.

USING TERRO® ANT KILLER II: Tear pieces of cardboard from the carton along the perforated lines. (Small pieces of paper, cardboard, or foil also may be used). Apply the product to the cardboard and place product where ants are seen, such as the edges of sinks, tubs, window sills, under food cabinets, along floors and baseboards and in corners. Do not skimp on bait placements; the more bait placements the better. Since invading ants usually have outdoor nesting sites, it often helps to put the product outside, close to where ants are found entering the structure. Ants typically follow defined trails from the nest to food or water. Placing TERRO® Ant Killer II close to these trails will improve control.

CONTROLLING AND ELIMINATING ANTS: First ants will come in large numbers, but soon disappear. This product is specifically formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony. The key to obtaining effective control is to monitor the placements and ensure there is always a fresh supply of TERRO® Ant Killer II on each placement. Complete control may take up to two weeks.

USING TERRO® BAIT BULLETS: This package contains TERRO® Ant Killer II and TERRO® Bait Bullets. Fill the TERRO® Bait Bullets half full with TERRO® Ant Killer II and place them, out of reach of children and pets, on a flat surface close to areas where ants are seen foraging or nesting. As the ants begin to feed on the bait you will notice many ants inside and around the opening to the Bait Bullet. If the ants consume the entire bait, simply refill the Bait Bullet.

USING TERRO® BAIT BULLETS AS A PERIMETER ANT DEFENSE SYSTEM: Take a few minutes to locate areas close to your home where ants are seen trailing. Place the Bait Bullets against the foundation where you have located ant movement. Space the Bait Bullets every 5 to 10 feet for maximum coverage. Check the Bait Bullets regularly for activity. Remember ants will feed on TERRO® Ant Killer II and carry the bait back to the rest of the colony. Heavy infestations may require several bait placement refills and up to two weeks to control.

USING TERRO® ANT KILLER II PRE-FILLED BAIT SYSTEM: Terro® Ant Killer II now comes as an easy-to-use pre-filled liquid ant bait [for outdoor use]. Ants will enter, feed and return to the nest where they will pass on the Terro® Ant Killer II to the rest of the colony.

- \$ Pre-filled
- \$ Ready to Use
- \$ No drips, spills, or mess

[MASTER LABEL – BACK PANEL PAGE 2 OF 3]

- 1. [Break pre-filled TERRO® Ant Killer II baits apart from plastic frame.]
- 2. Hold baits upright and [cut along dotted line at the top] *or* [cut off orange colored section] *or* [Hold the pre-filled bait station level and peel back clear {*or other appropriate descriptive term*} seal to expose entry point to bait.] *or* [hold firmly with one hand while [breaking][twisting][snapping] off the bait pack tab.]
- 3. Place baits label side up near ant trails or close to where ants are numerous. Place additional TERRO® Ant Killer II baits anywhere ants may enter your home. [For best results, use [all] [*number*] baits to ensure sufficient supply for the ants.]
- 4. Monitor regularly for activity but do not interfere with the ants or baits. Replace with additional baits when first set is depleted.
- 5. Once ants are controlled, replace TERRO® Ant Killer II baits every 3 months to keep ants from returning.

TERRO® OUTDOOR LIQUID ANT BAITS:

- 1. REMOVE STAKES by pulling them straight out from underneath cup. DO NOT REMOVE CUP.
- 2. [PUSH DOWN on the top of the cup, then twist cup 1/4 turn.] [Slide cup over bait reservoir. Cup will lock into place. Twist cup [1/4][1/2][full] turn.] The foil seal under the cup will be punctured and the liquid bait will drip into the reservoir in the base. KEEPS BAITS LEVEL TO AVOID SPILLING.
- 3. PLACE BAIT STATIONS outdoors close to where ants are found entering your home, or where you see ant nests or their trails.
- 4. SECURE BAIT STATIONS to the ground, if desired, by inserting the 2stakes provided through the holes in the base.
- 5. ANTS WILL ENTER the bait station through the holes at the top of the ramps.
- 6. MONITOR regularly for activity, but do not interfere with the ants or baits. Replace baits every three months to keep ants from returning. Complete control may take up to two weeks.
- 7. CALL US at 1-800-800-1819 if we can be of assistance.

TERRO® OUTDOOR LIQUID ANT BAIT STAKES [TERRO® OUTDOOR LIQUID ANT STAKES]:

- 1. PLACE TERRO® Ant Killer II [BAIT STATIONS] outdoors close to where ants are found entering your home, or where you see ant nests or their trails.
- 2. Insert Terro® Outdoor Liquid Ant [Bait] Stakes [bait stakes] into area to be treated by pushing firmly into the ground with your hand until the bottom of the bait stake contacts the ground. DO NOT use your foot or a tool to place in ground.
- 3. Keeping bait stake upright, hold firmly with one hand while [breaking][twisting][snapping] off bait pack tab.
- 4. Ants will enter the bait stake through the hole created by removing the bait pack tab.
- 5. Monitor regularly for activity, but do not interfere with the ants or baits.
- 6. Replace baits every three months or when bait level is no longer visible through [bait window] [stake window] [see-through monitor]. Complete control may take up to two weeks.
- 7. Call us at 1-800-800-1819 if we can be of any assistance!

DO NOT USE in edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed. Avoid contamination of feed and foodstuffs. Place bait in areas inaccessible to children and pets.

For further information on successful ant control using the TERRO® brand of ant control products, visit our web site (www.Terro.com).

[MASTER LABEL – BACK PANEL PAGE 3 OF 3]

PEST CONTROL OPERATORS

TERRO ® Ant Killer II can be diluted with water to obtain a 1% or 2% solution of Borax. Such a dilution is helpful when you plan on using a substantial volume of Terro® Ant Killer II in a baiting program designed to control very large multi-queen and multi-colony ant infestations. In these cases, you want the worker ants to carry as much <u>volume</u> of bait back to the colony as possible. To do this, you can dilute Terro® Ant Killer II to obtain a 1.0% per cent borax level. Upon a follow-up inspection, if ants still exist in great numbers, repeat initial treatment using a 2.0% solution. Once the ant infestation has improved dramatically, no dilution of the bait is recommended for follow-up treatments.

1% Dilution: 1 part TERRO ® Ant Killer II to 5 parts water. Mix thoroughly. 2% Dilution: 1 part TERRO ® Ant Killer II to 2 parts water. Mix thoroughly.

COMMON DILUTIONS

TERRO	+	WATER	=	FINISHED PRODUCT
5 fl. oz.	+	25 fl. oz.	=	1 Quart (approximately)
20 fl. oz.	+	100 fl. oz.	=	1 Gallon (approx.)
1 gallon	+	5 gallons	=	6 Gallons

2% Dilution

1% Dilution

TERRO	+	WATER	=	FINISHED PRODUCT
10 fl. oz.	+	20 fl. oz.	=	1 Quart (approximately)
42 fl. oz.	+	84 fl. oz.	=	1 Gallon (approx.)
1 gallon	+	2 gallons	=	3 Gallons

USING TERRO® ANT KILLER II IN BAIT STATIONS: Apply the 1% or 2% Terro® Ant Killer II solution using bait stations designed to hold liquid bait. This product will work well in most bait stations such as those made by B&G, Kness, and Whitmire Micro-Gen. Follow directions included with the bait stations to obtain best results.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. **STORAGE:** Store in a cool dry place. Do not store where children or animals may gain access. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable Container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[MASTER LABEL – OPTIONAL CLAIMS PAGE 1 OF 9]

[Optional Market Claims – [TERRO® OUTDOOR LIQUID ANT BAIT STAKES] [TERRO® OUTDOOR LIQUID ANT STAKES] [TERRO® OUTDOOR LIQUID ANT BAIT STAKES BONUS PACK] [TERRO® OUTDOOR LIQUID ANT BAIT STAKES VALUE PACK]

- [10] [8] [6] [4] [2] stakes
- 2 Free Ant Killer II Liquid Ant Baits {Note to reviewer: For use only on [TERRO® OUTDOOR LIQUID ANT BAIT STAKES BONUS PACK] [TERRO® OUTDOOR LIQUID ANT BAIT STAKES VALUE PACK]
- 8+2 stakes {Note to reviewer: For use on packages containing 10 stakes consumer receives 2 additional stakes than the regular 8 stake package}
- 2 [free] stakes [free] {Note to reviewer: For use on packages containing 10 stakes consumer receives 2 additional stakes than the regular 8 stake package}
- Bonus Pack {Note to reviewer: For use on packages containing 10 stakes consumer receives 2 additional stakes than the regular 8 stake package}
- 25% More {Note to reviewer: For use on packages containing 10 stakes consumer receives 2 additional stakes than the regular 8 stake package}
- 8 10 stakes {Note to reviewer: For use on packages containing 10 stakes consumer receives 2 additional stakes than the regular 8 stake package}
- 8 +2 stakes free {Note to reviewer: For use on packages containing 10 stakes consumer receives 2 additional stakes than the regular 8 stake package}
- Tiered steps for [easy] bait access
- Tiered steps for bait consumption
- Easy bait access with built-in steps [stairs]
- Steps for easy bait access
- As bait is consumed ants are able to continuously descend into the reservoir until all bait is gone
- Tiered bait pack reduces the chance of ants drowning so that ants are able take the bait back to feed the colony.
- Tiered steps [stairs] for easy access to bait
- Bait Pack ledges for easy bait access
- Tiered bait pack for increased bait consumption
- Sealed bait stays fresh until opened
- Twist [Break] [off bait pack tab] to activate [open]
- Easy to open- simply twist [break] [off bait pack tab].
- Twist Tab keeps liquid ant bait fresh until you are ready to use
- Easy to use
- Stay-Fresh twist tab
- Reinforced stake ridges for added strength
- Bait Window [Stake Window]- allows you to monitor liquid bait levels
- See-thru window allows you to easily monitor liquid bait
- See-thru bait monitor know when to replace stake
- Unique Bait Monitor lets you know when it is time to replace the stakes
- Bait monitor [window]
- Unique See-thru bait monitor [window]
- Made in the USA
- Liquid bait technology offers ants both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids
- This product is specifically formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- Ants can't live without water. TERRO Liquid Ant Bait contains both a food and water source for ants. TERRO liquid ant bait is formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the

EPA Reg. No. 149-8 Notification of Label Action – Alternate Brand Names, Packaging & Related Labeling, Graphics & Symbols, Other Minor Revisions June 8, 2015 Page 6 of 13

[MASTER LABEL – OPTIONAL CLAIMS PAGE 2 OF 9]

colony.

• [Bait] [stake(s)] not for individual sale

[Optional Market Claims - TERRO® OUTDOOR LIQUID ANT BAITS]

- [6] [8] Stations
- 6+2 Free {Note to reviewer: For use on packages containing 8 bait stations consumer receives 2 additional bait stations than the regular 6 bait station package}
- Bonus Pack {Note to reviewer: For use on packages containing 8 bait stations consumer receives 2 additional bait stations than the regular 6 bait station package}
- Value Pack {Note to reviewer: For use on packages containing 8 bait stations consumer receives 2 additional bait stations than the regular 6 bait station package}
- 2 FREE Stations {Note to reviewer: For use on packages containing 8 bait stations consumer receives 2 additional bait stations than the regular 6 bait station package}
- Ideal for large [ant] [infestations] [colonies]
- Best for large [ant] [infestations] [colonies]
- 6 [six] ounces of bait for large [ant] [infestations] [colonies]
- [Bait(s)] [stations] not for individual sale

[Optional Market Claims - TERRO® ANT KILLER II LIQUID ANT BAITS BONUS PACK]

- 1 Free outdoor liquid Ant bait stake
- 2 Fee outdoor liquid ant bait stakes
- Value Pack/Bonus Pack
- Tiered steps for [easy] bait access
- Tiered steps for bait consumption
- Easy bait access with built-in steps [stairs]
- Steps for easy bait access
- As bait is consumed ants are able to continuously descend into the reservoir until all bait is gone
- Tiered bait pack reduces the chance of ants drowning so that ants are able take the bait back to feed the colony.
- Tiered steps [stairs] for easy access to bait
- Bait Pack ledges for easy bait access
- Tiered bait pack for increased bait consumption
- Sealed bait stays fresh until opened
- Twist [Break] [off bait pack tab] to activate [open]
- Easy to open- simply twist [break] [off bait pack tab].
- Twist Tab keeps liquid ant bait fresh until you are ready to use
- Easy to use
- Stay-Fresh twist tab
- Reinforced stake ridges for added strength
- Bait Window [Stake Window]- allows you to monitor liquid bait levels
- See-thru window allows you to easily monitor liquid bait
- See-thru bait monitor know when to replace stake
- Unique Bait Monitor lets you know when it is time to replace the stakes
- Bait monitor [window]
- Unique See-thru bait monitor [window]
- Made in the USA
- Liquid bait technology offers ants both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids

[MASTER LABEL - OPTIONAL CLAIMS PAGE 3 OF 9]

- This product is specifically formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- Ants can't live without water. TERRO Liquid Ant Bait contains both a food and water source for ants. TERRO liquid ant bait is formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- [Bait(s)] [stations] not for individual sale

[Optional Market Claims – TERRO® MINI LIQUID ANT BAITS] [TERRO® MINI LIQUID ANT BAIT STATIONS]

- Easy to open
- Sealed bait stays fresh until opened
- Twist [Break] [Snap] [off bait pack tab] to activate [open]
- Easy to open- simply twist [break] [snap] [off bait pack tab].
- Twist Tab keeps liquid ant bait fresh until you are ready to use
- Easy to use [no scissors needed to open]
- Stay-Fresh twist [snap off] [break off] tab
- Made in the USA
- Liquid bait technology offers ants both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids
- This product is specifically formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- Ants can't live without water. TERRO Liquid Ant Bait contains both a food and water source for ants. TERRO liquid ant bait is formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- [Bait(s)] [stations] not for individual sale

[Optional Market Claims – TERRO® ANT KILLER II LIQUID ANT BAITS]

- Easy to open
- Sealed bait stays fresh until opened
- Twist [Break] [Snap] [off bait pack tab] to activate [open]
- Easy to open- simply twist [break] [snap] [off bait pack tab].
- Twist Tab keeps liquid ant bait fresh until you are ready to use
- Easy to use [no scissors needed to open]
- Stay-Fresh twist [snap off] [break off] tab
- Made in the USA
- Liquid bait technology offers ants both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids
- This product is specifically formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- Ants can't live without water. TERRO Liquid Ant Bait contains both a food and water source for ants. TERRO liquid ant bait is formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- [Bait(s)] [stations] not for individual sale

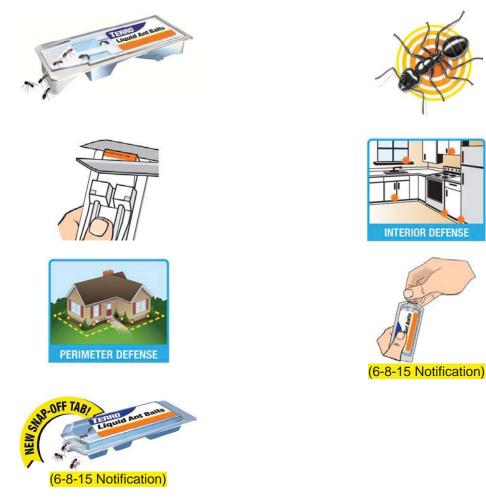
[MASTER LABEL – OPTIONAL CLAIMS PAGE 4 OF 9]

[Optional Graphics – Terro® Ant Killer II]





[Optional Graphics – Terro® Ant Killer II Liquid Ant Baits]



EPA Reg. No. 149-8 Notification of Label Action – Alternate Brand Names, Packaging & Related Labeling, Graphics & Symbols, Other Minor Revisions June 8, 2015 Page 9 of 13

[MASTER LABEL – OPTIONAL CLAIMS PAGE 5 OF 9]

[Optional Graphics – Terro® Outdoor Liquid Ant Baits]



















EPA Reg. No. 149-8 Notification of Label Action – Alternate Brand Names, Packaging & Related Labeling, Graphics & Symbols, Other Minor Revisions June 8, 2015 Page 10 of 13

[MASTER LABEL – OPTIONAL CLAIMS PAGE 6 OF 9]

[Optional Graphics – Terro® Outdoor Liquid Ant Bait Stakes, Terro® Outdoor Liquid Ant Stakes]







EPA Reg. No. 149-8 Notification of Label Action – Alternate Brand Names, Packaging & Related Labeling, Graphics & Symbols, Other Minor Revisions June 8, 2015 Page 11 of 13

[MASTER LABEL - OPTIONAL CLAIMS PAGE 7 OF 9]

[Optional Graphics – TERRO® Outdoor Liquid Ant Bait Stakes Bonus Pack, TERRO® Outdoor Liquid Ant Bait Stakes Value Pack]





(6-8-15 Notification)



(6-8-15 Notification)





(6-8-15 Notification)

EPA Reg. No. 149-8 Notification of Label Action – Alternate Brand Names, Packaging & Related Labeling, Graphics & Symbols, Other Minor Revisions June 8, 2015 Page 12 of 13

[MASTER LABEL - OPTIONAL CLAIMS PAGE 8 OF 9]

[Optional Graphics – Terro® Ant Killer II Liquid Ant Baits Bonus Pack]









EPA Reg. No. 149-8 Notification of Label Action – Alternate Brand Names, Packaging & Related Labeling, Graphics & Symbols, Other Minor Revisions June 8, 2015 Page 13 of 13

[MASTER LABEL - OPTIONAL CLAIMS PAGE 9 OF 9]

[Optional Graphics – TERRO® Mini Liquid Ant Baits] [TERRO® Mini Liquid Ant Bait Stations]





(6-8-15 Notification)