

DEC - 8 2006

Mr. Craig D. Kleppe  
BASF Corporation  
26 Davis Drive  
Research Triangle Park, NC 277093528

Subject: Revise Labeling  
Amddro Fire Ant Insecticide  
EPA Reg. No. 241-260  
Application Dated: October 20, 2005

Dear Ms. Kleppe:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the comments listed below:

A. Efficacy Issues/Revisions

The amendment submitted seeks to add the little fire ant, *Wasmannia auropunctata*, the Texas leafcutting ants, *Atta texana*, and "field ants", presumably *Formica* spp., to the product label.

- The addition of the *W. auropunctata* is acceptable.
- The addition of *A. texana* to the label IS NOT acceptable. This species of ant is not expected to consume the bait, as they cultivate fungi. Remove all reference to the Texas leafcutting ant from the label. Data may be submitted or cited in support of the addition of this species.
- The addition of the "field ant" is acceptable, if it is listed as "field ant."
- As a general note, when listing ant species by common name the name should be followed by ant (e.g., Argentine ant, bigheaded ant, Red Imported Fire ant). Use of ants after the species is likely to lead to confusion (e.g., Texas leaf cutting ants = leafcutting ants found in Texas or *Atta texana*).

B. Application Rates/Revisions

The only other significant efficacy issues pertain to the application rates provided. In the italicized examples, the amount of product applied according to the "Bait Station Chart" exceeds the limit (1.5 lbs/acre) provided elsewhere on the label. The amount of bait to be applied in ounces per bait station should also be provided.

L	Plot		Amount Applied		Bait Stations	lbs product
	W	Area	g	oz		
(ft)	(ft)	(ft <sup>2</sup> )			/acre	/acre
50	50	2500	50	1.76373	17.424	1.9207
45	45	2025	42	1.48153	21.5111	1.99184
40	40	1600	33	1.16406	27.225	1.98072
35	35	1225	25	0.88187	35.5592	1.9599
30	30	900	19	0.67022	48.4	2.02741
25	25	625	13	0.45857	69.696	1.99753
20	20	400	8.5	0.29983	108.9	2.04075
15	15	225	4.5	0.15874	193.6	1.9207
10	10	100	2	0.07055	435.6	1.9207

Table 1. Application rates presented on the label for various bait station spacings.

Also, the directions for use specify a minimum reapplication interval of 90 days; however, the later contradict this by allowing for “fresh AMDRO to be placed in the bait station after 2 weeks. This enter section is unclear and should be clarified with regard to application rate/acre/year and reapplication interval.

C. Claims: Collateral Labeling

1. The label refers to the web sites www.turffacts.com and www.pestcontrolfacts.com, making the web sites part of the labeling.

a. From www.turffacts.com:

i. The claim, “Eliminates the queen and her colony within seven days of a mound treatment” appears in association with the Amdro Pro product on the website. This claim is unacceptable; it is an unsubstantiated efficacy claim.

ii. The claim, “Rids the entire area of fire ants within two weeks of a broadcast application” appears in association with the Amdro Pro product on the website.

This claim is unacceptable; it is an assertion of heightened efficacy.

b. From www.pestcontrolfacts.com:

i. The claim, “AMDRO Pro Fire Ant Bait, with the proven active ingredient hydramethylon, is an effective long-term solution for fire ant control, killing the queen and eliminating both visible and hidden fire ant mounds. And unlike other insecticides that have only enough power to kill a few ants on contact, AMDRO kills steadily until the entire fire ant mound is destroyed. With AMDRO, there’s no mixing, mess or smell - just apply it and let it go to work. Its flexible dose and application options make it effective on both entire yards and single mounds.” appears on this website.

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The underlined portion of the text is clearly a comparative claim and must be removed.

D. Crop Grouping Revisions

Grapes and blueberry are not considered to be "tropical fruit and nut orchard" crops. You must move application instructions for grape and blueberry to a separate section of the label; since grapes and blueberries are not grown in the typical orchard configurations shown in the proposed application rate chart.

A copy of the reviews are enclosed for your records and stamped label "with comments" is enclosed.

You must submit two copies of the final revised printed label for the record. If these conditions are not complied with the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). The release for shipment of the product constitutes acceptance of these conditions.

Sincerely,



Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7505P)

# AMDRO<sup>1</sup> Granular Insecticide /

[Alternate brand names:]

AMDRO<sup>1</sup> PRO SWEET Ant Bait  
AMDRO<sup>1</sup> PRO SWEET

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

DEC - 8 2006

**KILLS IMPORTED AND NATIVE FIRE ANTS  
and other ants**

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

**KILLS THE QUEEN**

**DESTROYS THE MOUND**

241-260

Active Ingredient:	By wt.
Hydramethylnon: Tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone (3-[4-(trifluoromethyl)phenyl]-1-(2-[4-(trifluoromethyl)phenyl]-ethenyl)-2-propenylidene)hydrazone.....	0.88%
Inert Ingredients .....	99.12%
Total .....	100.00%

EPA Reg. No. 241-260

EPA Est. No.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION! / ;PRECAUCION!**

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

See additional **First Aid, Precautionary Statements and Directions For Use.**

In case of an emergency endangering life or property involving this product, call day or night at 1-800-832-HELP (4357).

For more information, please visit our website [www.turffacts.com](http://www.turffacts.com) or [www.pestcontrolfacts.com](http://www.pestcontrolfacts.com)

Manufactured For:  
**BASF Corporation**  
26 Davis Drive  
Research Triangle Park, NC 27709

# BASF

<sup>1</sup> Registered Trademark of Central Garden and Pet Company

<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>• Call a poison control center for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact BASF Corporation for emergency medical treatment information: 1-800-832-HELP (4357)</p>	

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

#### CAUTION!

**May be harmful if swallowed.** Avoid contact with skin, eyes, and clothing.

**Personal Protective Equipment (PPE):** Applicators and other handlers must wear:

- Long-sleeve shirt and long pants
- Chemical resistant gloves (such as rubber or waterproof gloves)
- Shoes plus socks

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

**Engineering Controls:** When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

#### User Safety Recommendations

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**Environmental Hazards:** This product is toxic to fish. **DO NOT** apply directly water, to areas where surface water is present, or to intertidal areas below the mean high water mark. **DO NOT** contaminate water when disposing of equipment washwaters. **DO NOT** apply when weather conditions favor drift from target areas.

**General Information:** AMDRO is a dry granular bait which is highly attractive to imported and native fire ants and other ants including bigheaded ant, field ant, and Texas leafcutting ant. Worker ants carry it into the mound as food for the colony. They eat it and feed it to the queen. AMDRO starts to kill ants immediately. In about a week the queen is dead, which destroys the mound.

Further information regarding ants may be obtained from your Cooperative Agricultural Extension Service.

### 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 by any method not specified on this label.

**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.

The 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:

- Coveralls
- Chemical resistant gloves (such as rubber or waterproof gloves)
- Shoes plus socks

**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 Standards 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.

- Keep unprotected persons out of treated area during pesticide applications.

**Outdoor Use:** AMDRO controls imported and native fire ants and other ants, such as harvester ants, bigheaded ants, field ants, Texas leafcutting ants, and Argentine ants. AMDRO is for use on lawns, landscaped areas, golf courses, and other noncropland areas such as airports, roadsides, cemeteries, commercial grounds, parks, school grounds, picnic grounds, athletic fields and other recreational areas, as well as on grounds surrounding poultry houses (excluding runs and ranges) or corrals and other animal holding areas. Avoid direct exposure of animals to AMDRO granules.

AMDRO may be used in and around container or field-grown ornamental and non-bearing nursery stock, and on sod farms (commercial turf). AMDRO may also be applied to the soil around non-bearing fruit or nut trees. AMDRO may also be applied to non-agricultural areas around the perimeter of nurseries, vineyards, orchards and groves. **DO NOT** harvest food/feed from non-bearing nursery stocks within one year of application. **DO NOT** graze or feed lawn or sod clippings to livestock.

Treatment	Rate	Comments
Individual mounds: Texas leaf cutting ant	0.75 lb / colony	Locate the central concentration of mounds, indicating the location of the colony. Apply bait directly onto and around mounds using a disposable spoon or measuring cup. <b>DO NOT</b> apply more than 2.0 lb. per acre. <b>DO NOT</b> contaminate kitchen utensils by use or storage.
Individual mounds: imported fire ants native fire ants harvester ants field ants bigheaded ants Argentine ant	2 to 5 level tablespoons	Distribute bait uniformly onto and around the mounds. For fire ants, <b>DO NOT</b> disturb the mound. <b>DO NOT</b> apply more than 2.0 lb. per acre. <b>DO NOT</b> contaminate kitchen utensils by use or storage.
Broadcast treatment: imported fire ants native fire ants harvester ants	1.0 - 1.5 lb./acre [2.0 - 3.0 oz./5,000 square feet]	Broadcast bait uniformly with ground (granular spreaders) or aerial equipment.

Broadcast treatment:	1.5 - 2.0 lb./acre	Broadcast bait uniformly with ground (granular spreaders) or aerial equipment.
bigheaded ants	[3.0 - 4.0 oz./5,000	
Argentine ant	square feet]	
field ants		
Texas leafcutting ants		

- Apply when ants are actively foraging (typically when soil temperature is greater than 60°F).
- However, AMDRO should not be applied to wet ground or wet grass, or if rain is expected within 24 hours after application, or when temperatures are below 50°F.
- Avoid leaving the bait exposed to direct sunlight for prolonged periods.
- During hot weather, application is best performed in the early morning or early evening when temperatures are cooler and ants are active.
- Check treated colonies/mounds for ant activity 30-40 days after treatment.
- Repeat applications as needed.

**Grass Forage (Pasture and Rangeland) Use:** AMDRO controls imported and native fire ants and other ants, such as harvester ants, bigheaded ants, Texas leafcutting ants, and Argentine ants. AMDRO may only be applied to grass forage (pasture and rangeland) for the control of ants only in the following states: Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia. Use of AMDRO on grass forage (pasture and rangeland) in states other than those listed is unlawful. Reference the table below for application directions. Applications of AMDRO to grass forage (pasture and rangeland) may not exceed a maximum rate of 8.0 pounds per acre per year, and AMDRO may not be applied more than 4 times per year with minimum application intervals of 90 days. **DO NOT** cut and bale hay from pastures and rangeland treated with AMDRO until 7 days after the bait application is made. The restrictions on the use of AMDRO on cutting and baling hay do not apply when the treated pasture and rangeland is used solely to support companion animals (e.g., horses, llamas). These companion animals cannot be used for food or feed.



Treatment	Rate	Comments
Individual mounds: Texas leaf cutting ant	0.75 lb / colony	Locate the central concentration of mounds, indicating the location of the colony. Apply bait directly onto and around mounds using a disposable spoon or measuring cup. <b>DO NOT</b> apply more than 2.0 lb. per acre. <b>DO NOT</b> contaminate kitchen utensils by use or storage.
Individual mounds: imported fire ants native fire ants harvester ants bigheaded ants Argentine ant	2 to 5 level tablespoons	Distribute bait uniformly around the mound. Fore fire ants, <b>DO NOT</b> disturb the mound. <b>DO NOT</b> apply more than 2.0 lb. per acre. <b>DO NOT</b> contaminate kitchen utensils by use or storage.
Broadcast treatment: imported fire ants native fire ants harvester ants	1.0 - 1.5 lb./acre [2.0 - 3.0 oz./5,000 square feet]	Broadcast bait uniformly with ground (granular spreaders) or aerial equipment.
Broadcast treatment: bigheaded ants Argentine ant Texas leafcutting ant	1.5 - 2.0 lb./acre [3.0 - 4.0 oz./5,000 square feet]	Broadcast bait uniformly with ground (granular spreaders) or aerial equipment.

- Apply when ants are actively foraging (typically when soil temperature is greater than 60°F).
- However, AMDRO should not be applied to wet ground or wet grass, or if rain is expected within 24 hours after application, or when temperatures are below 50°F.
- Avoid leaving the bait exposed to direct sunlight for prolonged periods.
- During hot weather, application is best performed in the early morning or early evening when temperatures are cooler and ants are active.
- Check treated colonies/mounds for ant activity 30-40 days after treatment.
- Repeat applications as needed.

**Uses for AMDRO Applied in Bait Stations:**

- Apply AMDRO in bait stations for control of field ant (*Formica perpilosa*) in both bearing and non-bearing: grape vineyards, citrus groves, grapefruit orchards, almond groves, and strawberry patches.
- Apply AMDRO in bait stations for control of Texas leafcutting ant (*Atta texana*) in both bearing and non-bearing citrus groves.

This treatment(s) involves placing AMDRO in bait stations (see section below entitled **Bait Stations** for list of applicable bait stations) that have been positioned in and around the vineyard or orchard or grove or patch. **DO NOT** apply AMDRO directly to the ground within the vineyard or orchard or grove or patch. **DO NOT** apply AMDRO directly to the ground around the base of plants (grape, strawberries) or trees (citrus, grapefruit, almond). **DO NOT** apply directly to any part of the plant or tree.

**1. Bait Station Applications in vineyard/orchard/grove/patch with actively foraging ants:**

See the BAIT STATION chart to determine the amount(s) of AMDRO to be placed into bait stations that are spaced at various lengths within the vineyard/orchard/grove/patch. Place the specified amount of AMDRO into the bait station depending on the spacing of bait stations within the vineyard/orchard/grove/patch. Other bait station spacings may be used (e.g. 8 x 8, 22 x 22, 37 x 37, etc.) depending on design of vineyard/orchard/grove/patch, spacing of trellis or trees and/or applicator preference to keep bait stations away from heavy traffic areas, access roads or alley ways in and around the vineyard/orchard/grove/patch. Then, the amount of AMDRO to be placed in the bait station needs to be re-calculated depending on the actual spacing of bait stations used. **DO NOT** exceed 2.0 lb of AMDRO per acre when applied in bait stations.

**BAIT STATION Chart**

Bait Station spacing (feet x feet)	Amount (in grams) of AMDRO placed into each bait station
50 x 50	52
45 x 45	42
40 x 40	33
35 x 35	25
30 x 30	19
25 x 25	13
20 x 20	8.5
15 x 15	4.5
10 x 10	2

After minimum of 2 weeks, move bait stations further away from treated area into adjacent infested areas. Place baits stations at desired spacing and place the specified amount of AMDRO into the bait station. However, if ants continue to be actively foraging in or around the bait stations, leave bait stations in place (and re-fill as necessary only with the specified amounts of AMDRO) until foraging activity is minimal or has ceased. Bait stations need not be placed immediately adjacent to nests.

**2. Bait Station Applications along Field Borders (to prevent ants from re-infesting vineyard/orchard/grove/patch):**

Place bait stations in border areas of the vineyard/orchard/grove/patch at spacings between 10 ft x 10 ft and 40 ft x 40 ft, depending on configuration of the vineyard/orchard/grove/patch and intensity of ant infestation. See the BAIT STATION chart, and place the specified amount of AMDRO into the bait station depending on the spacing of bait stations. Monitor stations at 2-week intervals and replace AMDRO as necessary.

**3. Bait Replacement in Bait Stations:**

Monitor the bait stations to determine if ants are present. If ants are not present or AMDRO has remained in the bait station for >10 weeks, remove AMDRO from the bait station and distribute uniformly in noncrop border areas. Re-place with the specified amount (see BAIT STATION chart, amount depends on bait station spacing) of fresh AMDRO in the bait station, and continue to monitor ant activity and AMDRO at 2-week intervals; or, remove bait station from site.

AMDRO may remain effective for up to 10 weeks (or longer) depending on environmental conditions. Excessively wet (prolonged high humidity, frequent and prolonged rainfall, and heavy mist) conditions may reduce the effectiveness AMDRO. Monitor ant activity in and around bait station and replace bait as necessary. Monitor ant activity either by visual or mechanical (e.g., traps) methods.

**4. Bait Stations:**

Several bait stations have been tested and allow the ants to take the bait [e.g., Perimeter Patrol System (B&G Equipment Co.), Drax Liquidator (Waterbury Co.), A.C.E. Station (Whitmire Micro-Gen Co.), Ants No More (Kness Mfg. Co.)]. Bait stations that minimize exposure to sunlight (dark colored) and moisture will help retain the effectiveness of AMDRO.

**Aerial Drift Management**

Avoiding drift at the application site is the responsibility of the applicator. The interaction of many equipment- and weather-related factors determine the potential for drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in Aerial Drift Reduction Advisory Information.

**Aerial Drift Reduction Advisory**

#### APPLICATION HEIGHT

Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety.

#### SWATH ADJUSTMENT

When applications are made with a crosswind, the swath will be displaced downward. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, etc.)

#### WIND

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including equipment type, determine drift potential at any given speed. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect drift.

#### SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from sensitive areas).

### STORAGE AND DISPOSAL

**Prohibitions:** Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

**Storage:** Store in cool, dry, secure place and keep container tightly closed. Store container away from pets. This product is formulated in an oil bait. Prolonged exposure to air may turn oil rancid and reduce the attractiveness of the bait. Use within 3 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.

**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.

**General:** Consult Federal, State, or local disposal authorities for approved alternative procedures.

### DISCLAIMER

The label instructions for the 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 use or application of the product contrary to label instructions, all of which are beyond the control of BASF Corporation (BASF). All such risks shall be assumed by the user. BASF warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use therein described when used in accordance with the directions for use, subject to the risks referred to above.

Any damages arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values or any other special or indirect damages.

BASF makes no other express or implied warranty, including any other express or implied warranty of FITNESS or of MERCHANTABILITY.

**NVA 2005-04-149-0243**

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