


241-371

7/25/1997

Page 1 of 5

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 11-30-93

(A) 	United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number 208000
	Application for Pesticide:		
	Section I		

1. Company/Product Number 241-371	2. EPA Product Manager M. Johnson	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) SENSIBLE™/SUBTERFUGE™ Termite Bait	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) American Cyanamid Company Agricultural Research Center P.O. Box 400 Princeton, NJ 08543-0400 <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 in composition and labeling to: EPA Reg. No. _____ Product Name _____	

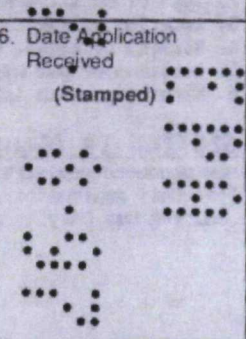
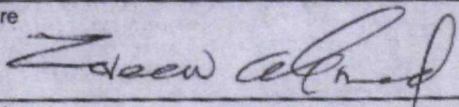
Section II	
<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/>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

NOTIFICATION
JUL 25 1997

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

Notification of Alternate Brand Name and Submission of Final Prints for Leaflet and Box Labels Incorporating EPA Approved Language.

Section III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," Unit Package wgt. 0.90z	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," Package wgt. 30	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) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container	4. Size(s) of Retail Container 0.90z, 1.25 lb	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label Is Affixed To Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other (_____)	

Section IV		
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Zareen Ahmed	Title Product Registrations Manager	Telephone No. (Include Area Code) 609-716-2321
Certification 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 	3. Title Product Registrations Manager	
4. Typed Name Zareen Ahmed	5. Date 7/3/97	



THIS SUBMISSION DOES NOT CONTAIN 40 CFR 158 DATA

2 28

American Cyanamid Company
Agricultural Products Research Division
P.O. Box 400
Princeton, NJ 08543-0400
Phone (609) 716-2000
General Fax (609) 275-3582

July 3, 1997

Mr. Marion J. Johnson
Team Leader, (Team 10)
IRB/Registration Division (H7505C)
U. S. EPA Office of Pesticide Programs
Crystal Mall, Building No. 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Re: SENSIBLE™/SUBTERFUGE™ Termite Bait: EPA Reg. No. 241-371;
Notification of Alternate Brand Name and Submission of Final Prints for Leaflet and Box
Labels Incorporating EPA Approved Language (OPP 208000).

Dear Mr. Johnson:

American Cyanamid Company hereby NOTIFIES the EPA of an alternate brand name, SUBTERFUGE Termite Bait for SENSIBLE Termiticide Bait, EPA Reg. No. 241-371. In addition, this notification also includes submission of highlighted copies of each of the final print labels for the product which is packaged in two different sizes (0.9 oz and 1.25 lb).

As indicated in the highlighted sections of the final print labels, the following Agency comments have been incorporated into the labels:

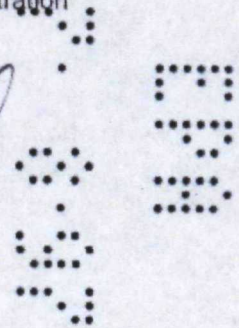
- The EPA Registration Number, 241-371, has been added;
- All references to the use of this pesticide in bait stations other than those designed by American Cyanamid Company specifically for this pesticidal usage have been deleted from the label;
- The uses depicted by the approved labeling are recognized by a unique registration (241-371); the two separate labels refer to two distinct package sizes (a 0.9 oz pre-filled cartridge and a 1.25 lb container from which the bait will be dispensed into a proprietary bait delivery system).

This submission also includes, as Exhibit 1, a copy of EPA's comments and stamped approved labels dated 6/19/97. These comments have been incorporated in the highlighted copies of final prints of the labels for the boxes and leaflets for both the 0.9 oz and 1.25 lb package sizes. Five (5) loose copies of each of the labels are also included for your files.

Please call me directly at 609-716-2321, (e-mail at ahmedz@pt.cyanamid.com) if you have any questions regarding these labels. Thank you for your continued assistance with the registration of hydramethylnon based products.

Respectfully submitted,

Zareen Ahmed
Product Registration Manager
U.S. Plant Regulatory Affairs



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STICH ALL PESTICIDES CAN BE HARMFUL TO HEALTH AND THE ENVIRONMENT IF MISUSED. READ THE LABEL CAREFULLY AND USE ONLY AS DIRECTED. SEE DISCLAIMER ON CONTAINER LABEL.

SUBTERFUGE™

Termite Bait

For Use in the Control of
Subterranean Termite Infestations
(*Reticulitermes* spp., *Coptotermes* spp., *Heterotermes* spp.)

Only for Sale to, Use and Storage by
Professional Pest Control Operators



Net Contents: 30 x 0.9 ozs.
™ Trademark of American Cyanamid Company

NOTIFICATION
JUL 25 1997
6/97

SUBTERFUGE™

Termite Bait

For Use in the Control of
Subterranean Termite Infestations
(*Reticulitermes* spp., *Coptotermes* spp., *Heterotermes* spp.)

Only for Sale to, Use and Storage by
Professional Pest Control Operators

Active Ingredient: Hydramethylnon
Tetrahydro-5,5-dimethyl-2H-1,2,4-triazin-3-yl-4-(4-fluorophenyl)butyl-1-yl 0.3%
Inert Ingredients 99.7%
Total 100.0%
EPA Reg. No. 241-371 EPA Est. No. 5905-AP-01

**KEEP OUT OF REACH OF CHILDREN
CAUTION/¡PRECAUCION!**

PRECAUCION AL USUARIO: Si usted no sea profesional, no use este producto hasta que le indiquen lo contrario en las etiquetas y/o instrucciones.

See Side Panel for Additional Precautionary Statements.



American Cyanamid Company
Herb America Agricultural Products Division
Specialty Products Department
One Cabot Drive, Parsippany, NJ 07054 ©1997

Net Contents: 30 x 0.9 ozs.
™ Trademark of American Cyanamid Company

6/97

IMPORTANT
PRINTED ON RECYCLED PAPER
100% POST CONSUMER WASTE

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Termite Bait

SUBTERFUGE

SUBTERFUGE

Termite Bait

**For Use in the Control of
Subterranean Termite Infestations**
(*Reticulitermes* spp., *Coptotermes* spp., *Heterotermes* spp.)

Only for Sale to, Use and Storage by
Professional Pest Control Operators



Net Contents: 30 x 0.9 ozs.
TM Trademark of American Cyanamid Company

6/97

Termite Bait

SUBTERFUGE

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION!

MAY BE HARMFUL IF SWALLOWED

Harmful if absorbed through the skin. Causes moderate eye injury. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN:

Wash with plenty of soap and water. Get medical attention.

IF IN EYES:

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

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not use this product in locations where the bait or its hydramethylnon

contents may be washed out of the bait station into ponds, streams, springs, or other natural water sources.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. See inside leaflet for complete Directions For Use.

STORAGE AND DISPOSAL

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

Storage:

Keep bait cartridges wrapped until ready to be used. Store in original container in a dry storage area.

Pesticide Disposal:

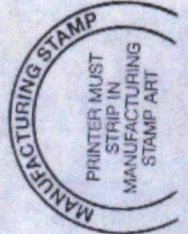
Wrap used bait cartridges in paper and place in a trash can.

General:

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

See inside leaflet for Disclaimer.

In case of an emergency endangering life or property involving this product, call collect day or night, Area Code (973) 663-3100.



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SENSIBLE™ Termiticide Bait

For use in the control of subterranean termite infestations
(Reticulitermes spp., Coptotermes spp., Heterotermes spp.)

Only for Sale to, Use and Storage by Professional Pest Control Operators

Active Ingredient: Hydramethylnon:	
Tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone	
(3-[4-(trifluoromethyl)phenyl]-1-(2-[(trifluoromethyl)phenyl]-ethenyl)-2-propenylidene)hydrazone	0.3%
Inert Ingredients	99.7%
Total	100.0%

EPA Reg. No. 241-XXX

EPA Est. No. XXX

KEEP OUT OF REACH OF CHILDREN

CAUTION/PRECAUCION!

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta la haya sido explicada ampliamente.

See Back Panel for Additional Precautionary Statements

AMERICAN CYANAMID COMPANY
AGRICULTURAL PRODUCTS DIVISION
SPECIALTY PRODUCTS DEPARTMENT
WAYNE, NJ 07470 . ©1996

NOTIFICATION

JUL 25 1997

Net Weight XXX lb.

Product Code XXX
6/96

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 19 1997

™Trademark of American Cyanamid Company

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
241-371

SUBTERFUGE termite bait is to be applied from bait stations which are installed in or around the building(s) or structure(s), or in a localized area(s), where termite activity is confirmed or suspected.

- Where termite activity is confirmed, locate bait stations within 12 inches of the site of termite activity; where access is restricted by paving or similar ground covering, locate bait stations as close to the site of termite activity as possible.
- Where termite activity is only known from feeding sites in the structure, it is recommended to locate bait stations in the soil beneath these feeding sites.
- Bait stations may also be used in areas conducive to termite foraging activity: such as, but not limited to, damp areas or areas where wood is in contact with soil.
- After baiting the sites above, additional bait stations may be located in areas of likely termite activity where no termites were detected.

~~For remedial treatments, where SUBTERFUGE is used alone, at a minimum, at least one bait station must be installed for every 20 linear feet of the foundation where soil access is not restricted.~~ Install as many bait stations as needed to thoroughly cover all sites of known or suspected termite activity around the structure to be protected.

This product can be applied to in-ground and above ground bait stations. SubStation™ Termite Bait Delivery Systems have been specially designed for use with this product. However, SUBTERFUGE termite bait can be applied to any, tamper-resistant bait station for controlling subterranean termite infestations.

Read and understand the manufacturer's instructions for installing and operating their termite bait station.

NOTE: While SUBTERFUGE termite bait can be established in soil that has been previously treated with conventional termiticide barriers, these conventional termiticides may act as a repellent and reduce the chances that termites will discover and feed on the bait.

7 8 8

SUBTERFUGE™

TERMITE BAIT

For use in the control of subterranean termite infestations

(*Reticulitermes* spp., *Coptotermes* spp., *Heterotermes* spp.)

Only for Sale to, Use and Storage by Professional Pest Control Operators

Active Ingredient: Hydramethylnon:	
Tetrahydro-5,5-dimethyl-2(1 <i>H</i>)-pyrimidinone	
(3-[4-(trifluoromethyl)phenyl]-1-(2-[(trifluoromethyl)phenyl]-ethenyl)-2-propenylidene)hydrazine	
	0.3%
Inert Ingredients	99.7%
Total	100.0%

EPA Reg. No. 241-371

KEEP OUT OF REACH OF CHILDREN CAUTION! PRECAUCION!

PRECAUCION AL USUARIO: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION!

MAY BE HARMFUL IF SWALLOWED

Harmful if absorbed through the skin. Causes moderate eye injury. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water. Do not use this product in locations where the bait or its hydramethylnon contents may be washed out of the bait station into ponds, streams, springs, or other natural water sources.

DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **Storage:** Keep bait cartridges wrapped until ready to be used. Store in original container in a dry storage area. **Pesticide Disposal:** Wrap used bait cartridges in paper and place in a trash can. **General:** Consult Federal, State, or local disposal authorities for approved alternative procedures.

General Information

SUBTERFUGE termite bait is intended for use as a supplement, or alternative, to conventional methods for controlling termite infestations in and around areas such as, but not limited to, buildings, wooden structures, or landscape timbers. **SUBTERFUGE** contains a bait matrix which has been shown to be a preferred food source. The bait matrix has been shown to stimulate feeding activity and induce the recruitment of termites. The active ingredient in **SUBTERFUGE**, hydramethylnon, has been shown to be effective in controlling communal or social insects. Foraging workers from subterranean termite colonies (*Reticulitermes* spp., *Coptotermes* spp., or *Heterotermes* spp.) that discover and feed on **SUBTERFUGE** will recruit other foragers to the bait and pass it on to other colony members, including the reproductive forms. **SUBTERFUGE termite bait** must be used in conjunction with a regularly scheduled inspection and monitoring program. The frequency of inspection and monitoring necessary to achieve effective control will vary depending on the level of termite activity, the size of the termite colony, and the conditions conducive to termite infestation present at the structure being protected by **SUBTERFUGE**.

SUBTERFUGE termite bait is For Use Under One Or More Of The Following Treatment Strategies

Supplemental Treatment
In conjunction with a conventional soil termiticide, placements of **SUBTERFUGE termite bait** can be established in and around the building or structure* to be protected, concentrating bait placement in areas where termite activity is known or suspected to exist. **SUBTERFUGE** may also be established in the soil beneath concrete slabs, asphalt, paving stones, or other ground coverings. As a supplemental treatment, **SUBTERFUGE** can be used to control termite activity in localized areas where environmental conditions, structural design, or other situations may preclude the use of soil termiticides, or in locations where failure of an existing termiticide barrier is suspected. In a supplemental treatment, monitor and service bait placements at least once every three to five months during the active termite season.

Remedial Treatment
For control of subterranean termites infesting buildings or structures*, placements of **SUBTERFUGE termite bait** can be established in and around the building or structure, concentrating bait placement in areas where termite activity is known or suspected to exist. **SUBTERFUGE** may also be established in the soil beneath concrete slabs, asphalt, paving stones, or other ground coverings. In a remedial treatment, monitor and service bait placements at least once every two to three months during the active termite season.

Preventive Treatment
As an aid to the prevention from attack by subterranean termites, placements of **SUBTERFUGE termite bait** can be established in the soil in and around the exterior of the building or structure* to be protected. **SUBTERFUGE** may also be established in the soil beneath concrete slabs, asphalt, paving stones, or other ground coverings. Monitor and service the bait in a preventative treatment at least once every three to five months during the active termite season.

ORIGINAL

* Application sites for **SUBTERFUGE termite bait** include, but are not limited to, areas near wooden structures (houses, condominiums, apartments, commercial properties, garages, barns and other buildings), decks, fences, utility poles, retaining walls, trees, landscape plantings, wood piles, or other wood-in-service which could be attacked, or is actively being attacked, by subterranean termites.

General Use Instructions

Before placements of **SUBTERFUGE termite bait** can be established, an inspection of the structure to be protected (and outbuildings or landscaping on the property) must be conducted to identify those sites in and around the structure where termite activity can be confirmed [e.g., mud tubes from the soil to the structure; live termites under mulch, or in construction scraps or landscape timbers] and to identify other sites where termite activity is suspected [e.g., active feeding site in structural timbers, with no evident soil activity adjacent to this feeding site].

SUBTERFUGE termite bait is applied from bait stations which are installed in or around the building(s) or structure(s), or in a localized area(s), where termite activity is confirmed or suspected.

- Where termite activity is confirmed, locate bait stations within 12 inches of the site of termite activity where access is not restricted.
- Where termite activity is only known from feeding sites in the structure, it is recommended to locate bait stations in the soil beneath these feeding sites.
- Bait stations may also be used in areas conducive to termite foraging activity: such as, but not limited to, damp areas or areas where wood is in contact with soil.
- After baiting the sites above, additional bait stations may be located in the soil at areas of likely termite activity along expanses of the foundation where no termites were detected.

For remedial treatments, where **SUBTERFUGE** is used alone, at a minimum, at least one bait station must be installed for every 20 linear feet of the foundation where soil access is not restricted. Install as many bait stations as needed to thoroughly cover all sites of known or suspected termite activity around the structure to be protected.

Installing the SubStation™ Termite Bait Delivery System

Using a soil auger (≥2" diameter), core sampler, or hand trowel, excavate a hole to a depth of 7 to 8 inches. Seat the bait cartridge fully into the **SubStation** housing and make sure that the lateral slots in the cartridge and housing are aligned to their maximal opening. With the cover detached, set the assembled **SubStation** into the hole until flush with soil surface. Being careful not to foul the locking mechanism with soil, backfill the space between the **SubStation** and the excavation. Using a screwdriver or similar probe, tamp the soil down and continue backfilling until the **SubStation** is securely anchored in the soil.

To seal the cover, and limit access to authorized persons, invert the cover by pressing in on the central dome until the cover turns inside out. Center the inverted cover over the bait cartridge, making sure that the locking-teeth on the underside of the cover are seated over the rim of the cartridge. Apply pressure to outer edges of cover until it snaps back to the normal (closed) position.

To open the **SubStation** for inspection and servicing, apply significant pressure to the central dome on the cover until the cover inverts and the locking-teeth are freed. Set the cover aside. Hold firm the flange of the station housing, and turn the bait cartridge counterclockwise.

NOTE: While **SUBTERFUGE termite bait** can be established in soil that has been previously treated with conventional soil termiticides, these termiticides may act as a repellent and reduce the chances that termites will discover and feed on the bait.

Monitoring and Servicing Instructions

It is important to maintain the supply of **SUBTERFUGE termite bait** in the bait stations at all times. At least once every two to five months, depending upon the treatment strategies described above, bait installations must be inspected for termite activity and the bait consumption monitored. In areas of high termite activity, bait availability may need to be monitored more frequently as termites can rapidly deplete the bait supply when recruitment is high.

When inspecting the bait installations for termite activity, visually estimate the amount of bait which has been consumed since the previous inspection.

- When termites have consumed less than approximately 75% of the **SUBTERFUGE termite bait** in any installation, the bait cartridge should be returned to the station housing.
- When termites have consumed approximately 75% or more of the **SUBTERFUGE termite bait** in any installation, replace the depleted bait cartridge with a new bait cartridge.
- It may be desirable to increase the number of bait installations in the immediate vicinity of baits which are being heavily fed upon; this will increase the amount of bait available to the colony and can hasten control.

After no new evidence of activity has been observed, **SUBTERFUGE termite bait** can remain in place to preserve long-term population control, or to detect the presence of new or persistent infestations in an on-going monitoring program. After achieving control of the population, the frequency of monitoring for the bait installations can be increased to annually. In a long-term monitoring program, fresh baits must be installed annually; this is best done in the peak swarming season. If termite activity is discovered in the structure being protected during the long-term monitoring, then the active baiting program and/or other control measures must be initiated.

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. 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 American Cyanamid Company. All such risks shall be assumed by the user. American Cyanamid Company 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.

American Cyanamid Company makes no other express or implied warranty, including any other express or implied warranty of FITNESS or of MERCHANTABILITY.

In case of an emergency endangering life or property involving this product, call collect, day or night, Area Code (201) 835-3100.



CYANAMID
American Cyanamid Company
North America Agricultural Products Division
Specialty Products Department
One Campus Drive
Parsippany, NJ 07054

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