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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Mr. George Meindl
FMC Corporation
APG Speciality Products
P.O. Box 8
Princeton, NJ 08543

MAR 3 1997

Dear Mr. Meindl:

Subject: Amendment - Revised Directions for Use
FirstLine Termite Bait Station
EPA Registration Number 279-3153
Your Application Dated October 28, 1996

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Delete the phrases "...or each individual apartment in an apartment, complex or duplex." and "... unless it contains 1 or more apartments" from the label since an apartment is considered one residential unit. Therefore if more than four bait stations were used in an apartment, this product would be required to be in child resistant packaging.
2. Delete the statement "Do not use on any tree used in food/feed production" since trees are not a use site.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager 13
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

CONCURRENCES

SYMBOL	SURNAME	DATE					
LA							

FirstLine™

Termite Bait Station

Only for Sale to, Use and Storage by Professional Pest Control Operators in Commercial, Industrial, Institutional and Residential Areas.

EPA Reg. No. 279-3153

EPA Est. No.

Active Ingredient:

By Wt.

N-Ethyl perfluorooctanesulfonamide 0.01%

Inert Ingredients 99.99%

Total 100.00%

U.S. Patent No. 4,921,696 Other U.S. and Foreign Patents Pending

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS

CAUTION

See other panels for additional precautionary information.

STATEMENT OF PRACTICAL TREATMENT

If on skin: Wash with plenty of soap and water. Get medical attention.

For Emergency Assistance Call: (800) 331-3148.

PRECAUTIONARY STATEMENTS Hazards to Humans (and Domestic Animals)

Caution: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAR 3 1997

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

279-3153



FMC Corporation
Agricultural Products Group
Philadelphia, PA 19103

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STORAGE AND DISPOSAL

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

Pesticide Storage

Keep out of reach of children and animals. Store in original containers only. Store in a cool dry place and avoid excess heat.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call FMC: (800) 331-3148.

To confine spill: Cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

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

Wrap FirstLine™ Termite Bait Station and put in trash. Plastic bags: Completely empty bag. 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

Food Handling Establishments: Places other than private residences in which food is held, processed, prepared or served.

Non-Food/Feed Areas: Includes garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, garages, mop closets, and storage (after canning or bottling). Areas conducive to termite attack or through which termites may enter should be treated.

Food/Feed Areas: The FirstLine Termite Bait Station is not labeled for use in food/feed areas. Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. For indoor application in the home or similar areas, do not place FirstLine Termite Bait Stations in an area where there is the possibility of contaminating food or surfaces that come in contact with food. Not for use in USDA Meat and Poultry Plants.

DIRECTIONS FOR USE

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

FirstLine Termite Bait Stations are ready to use and filled with a treated cellulosic matrix containing 100 ppm sulfuramid, a slow acting insecticide. The use of this bait suppresses or controls Termite infestations. The Termite activity depends on the species involved, weather, moisture, and the time of year. Termites may require 1 to 4 months or more for control in and on commercial, industrial, institutional and residential buildings and structures, and their immediate surroundings. Permitted areas of use include but are not limited to industrial buildings, houses, apartment buildings, laboratories, and the non-food/feed areas of stores, warehouses, schools, nursing homes, hospitals, restaurants, hotels, churches, food manufacturing, processing and service establishments. The bait is effective against: Coptotermes, Heterotermes, and Reticulitermes Termites.

FirstLine Termite Bait Stations are used to control local infestations of termites in and around structures in situations such as: in posts, rubble foundations, masonry voids, roofs, building siding, foam insulation, caulked joints, slabs, wood beams, non-food/feed areas, sewer systems, manhole covers, electrical systems, attics, underground cabling, basements, porches, crawlspaces, sheds, garages, and interior and exterior planters. Use FirstLine Termite Bait Stations only on flat surfaces. Termites infesting areas adjacent to wells may be treated, whether the well is within the structure or not, but no baits may be placed inside of a well.

For Structures With an Active Infestation

For use in individual residential structures or apartments, do not apply more than four FirstLine™ Termite Bait Stations per unit.

A unit is a single family dwelling (Single home or Townhouse) or each individual apartment in an apartment, complex or duplex. A garage, whether attached or detached is considered part of a primary residence unless it contains 1 or more apartments.

For commercial, industrial and institutional (excluding daycare or preschool) structures use as many FirstLine Termite Bait Stations as needed to control active termite mud tubes.

FirstLine Termite Bait Stations should be placed in close proximity to actively foraging Termites so that the bait may be located by the termites and ingested. Time required for control varies depending upon how quickly the Termites tube into or enter the FirstLine Termite Bait Station and feed upon the bait.

Termite activity indoors may be controlled by first locating Termite mud tubes. Break off 1 inch of leading edge of the tube or a section of the tube to fit the FirstLine Termite Bait Station. Install station, using tamper resistant screws (Robertson or Phillips head or similar) so that the Termites will rebuild their tubes into the station and feed upon the bait. As an option, the bait may be lightly misted with water prior to installation to enhance Termite attraction. The bait should not be saturated with water to the point of runoff. For each active mud tube, use one FirstLine Termite Bait Station. For situations where the mud tube has branched or has bypassed an existing station, an additional station may be installed. Do not apply more than four FirstLine Termite Bait Stations per unit.

This FirstLine Termite Bait Station may be attached to infested wood or masonry. Screw the stations directly into wood, drywall, or masonry surfaces. For best results, install the FirstLine Termite Bait Station so the ridges of the bait matrix are in the same direction as the Termite. In some situations, a break in the tube must be made to accommodate the whole FirstLine Termite Bait Station. If used on the exterior of the structure, electrician's putty or similar sealant may also be used on the outside of the station to achieve a water tight seal for outdoor installations.

Minimize disturbance of Termites during all phases of the FirstLine Termite Bait Station installation and inspection. Replace the FirstLine Termite Bait Stations before Termites consume all of the bait within a station.

The PCO must inspect the FirstLine Termite Bait Stations every 2 to 4 weeks until the bait is consumed and/or Termite activity ceases, replacing any stations with significant feeding (at least 50% of bait consumed). The frequency of inspection should be adjusted according to Termite species, foraging pressure and climatic conditions. After feeding has stopped, the station can be removed.

Attention

- Do not install FirstLine Termite Bait Stations within wells.
- Do not spray FirstLine Termite Bait Stations during pesticide applications.
- Do not reuse FirstLine Termite Bait Stations.
- Do not place FirstLine Termite Bait Station in an area where there is the possibility of contaminating food or surfaces that come in contact with food.
- Do not use on any tree used in food/feed production.
- Do not install FirstLine Termite Bait Stations in contact with water.

Submit to EPA as an amendment

Distributors Should Sell in Original Packages Only

Terms of Sale or Use: On the purchase of this product buyer and the user agrees to the following conditions:

Warranty: FMC makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Except as so warranted, the product is sold as is. Buyer and user assume all risk of use and/or handling and/or storage of this material when such use and/or handling and/or storage is contrary to label instructions.

Directions and Recommendations: Follow directions carefully. Timing, method of application, weather conditions, mixture with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller and are assumed by the buyer at his own risk.

Use of Product: FMC's recommendations for the use of this product are based upon tests believed to be reliable. The use of this product being beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice.

Damages: Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid and shall not include incidental or consequential damages.

FMC & FirstLine - FMC Trademarks

(1629-4/18/96)