



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON D C 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Jill Holihan  
Registration and Regulatory Affairs Manager  
FMC Corporation  
1735 Market Street  
Philadelphia, PA 19103

**NOTIFICATION**

**DEC 13 2012**

Subject        Application for Pesticide Notification  
                 EPA Registration Number 279-9559  
                 Date of Submission October 25, 2012

Dear Registrant

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated October 25, 2012, for the abovementioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please contact Clayton Myers at (703) 347-8874, or via email at [myers.clayton@epa.gov](mailto:myers.clayton@epa.gov)

Sincerely,

A handwritten signature in black ink, appearing to be "Mark Suarez", written over a large, stylized capital "C".

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

Enclosures        Copy of Label Stamped Notification



United States  
Environmental Protection Agency  
Washington DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1 Company/Product Number 279-9559	2 EPA Product Manager Mark Suarez	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) F9878-1 Termite Bait	PM# 13	
5 Name and Address of Applicant (Include ZIP Code) FMC Corporation 1735 Market Street Philadelphia PA 19103 <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

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

FMC would like to add Totality Termite Bait as an alternate brand name for the subject registration FMC believes that this change is in full compliance with PR Notice 98 10 section II Labeling Notifications Part A Brand Names

jill.holihan@FMC.com

**Section - III**

1 Material This Product Will Be Packaged In			
Child Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2 Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt	No per container
		If "Yes" Package wgt	No per container
3 Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4 Size(s) Retail Container	5 Location of Label Directions	
6 Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued 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 Jill Holihan	Title Registration and Regulatory Affairs Manager	Telephone No (Include Area Code) 215 299 6436
<b>Certification</b> 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		Date Application Received (Stamped)
2 Signature 	3 Title Registration and Regulatory Affairs Manager	
4 Typed Name Jill Holihan	5 Date 10/25/2012	

A collection of 15 small, stylized line drawings of various insects, including beetles, flies, and bees, arranged in a grid-like pattern.

# Totality 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

EPA Reg No 279-9559

EPA Est No

## Active Ingredient

## By Wt

Lufenuron N-[2 5-dichloro-4-(1 1 2 3 3 3-hexafluoropropoxy)-phenylaminocarbonyl]-2 6-difluorobenzamide

0 15%

## Inert Ingredients

99 85%

Total

100 00%

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TOTALITY TERMITE BAIT is a cellulose based bait matrix that contains 0 15% by weight of the insect growth regulator Lufenuron

**KEEP OUT 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)

See other panels for additional precautionary information

FIRST AID	
If swallowed	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice</li><li>• Do not give any liquid to the person</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>
If on skin or clothing	<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>
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment You may also contact 1 (800) 331 3148 for Emergency Assistance	
For Information Regarding the Use of this Product Call 1 800 321 1FMC (1362)	

# FMC

FMC Corporation  
Agricultural Products Group  
Philadelphia, PA 19103

**NET CONTENTS**

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# 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

### STORAGE AND DISPOSAL

Do not contaminate water food or feed by storage or disposal

#### Pesticide Storage

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

#### Pesticide Disposal

Pesticide wastes may be hazardous. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

#### Container Handling

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.

### 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

TOTALITY 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*. TOTALITY 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. TOTALITY TERMITE BAIT 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 TOTALITY 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, termite activity, termite species, and time of year.

TOTALITY 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 TOTALITY 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.

## BELOW-GROUND USE

### Permitted Sites

TOTALITY 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. TOTALITY 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** TOTALITY 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** TOTALITY 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** TOTALITY 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 TOTALITY TERMITE BAIT, 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 TOTALITY TERMITE BAIT.

**Baiting With Monitoring Program** TOTALITY 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, TOTALITY TERMITE BAIT Tubes containing TOTALITY TERMITE BAIT 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 FMC termite monitoring/baiting stations to deploy TOTALITY 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.

### Placement of Monitoring or Baiting Stations

Monitoring stations must be monitored at least once every three months until bait has been deployed. Proper placement and maintenance of monitoring stations prior to deployment of TOTALITY 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 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 TOTALITY 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 TOTALITY 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 a supply of TOTALITY TERMITE BAIT at all times to ensure that sufficient amount of TOTALITY TERMITE BAIT 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 Totality Termite Bait and resume the termite monitoring schedule as described above.

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Minimize disturbance of termites during all portions of TOTALITY TERMITE BAIT treatment. This will 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 TOTALITY 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.

## ABOVE-GROUND USE

### Permitted Sites

TOTALITY 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. TOTALITY 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.

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## INSTRUCTIONS FOR USE

### General Considerations

TOTALITY 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 TOTALITY 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 TOTALITY 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 TOTALITY 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 TOTALITY 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 TOTALITY 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 TOTALITY TERMITE BAIT. The TOTALITY TERMITE BAIT receptacle can be removed if termite feeding has not been observed for two consecutive monitoring periods. Once TOTALITY TERMITE BAIT receptacles have been removed, periodic inspections of the structure for renewed termite activity are recommended.

### Use in Food Handling Establishments

TOTALITY 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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