UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jan Brill
Bayer Environmental Science
2 T.W. Alexander Dr.
Research Triangle Park, NC 27709

JUL 19 2007

Dear Mr. Brill:

Subject: Labeling Amendment; Label Claims
Premise 2 Insecticide
EPA Registration No. 432-1331
Date Submitted: May 11, 2007

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

1. Delete each of the following claims:
   - The active ingredient in Premise (imidacloprid) is the most widely used insecticide in the world.
   - You can trust Premise to protect your home. Over ten years of use, in the US, has proven that Premise can offer unsurpassed protection.
   - Your pest management professional trusts Premise to protect your home and you can too.
   - Premise has been used to protect millions of homes from termite attack.
   - Premise has been widely used, in the US, for over 10 years now with a proven track record for protecting structures from termite attack.
   - Premise was the first non-repellent insecticide offered for termite control.
   - As a non-repellent, termites can not detect the presence of imidacloprid, at the upper or lower range of parts per million in the soil.
   - Premise is a non-repellent insecticide – insects don't know it is there, so they readily enter treated areas and become exposed.
   - Premise is non-repellent to insects, which means that insects can not detect and avoid those areas where applied. Non-repellent products offer many advantages over repellent where insects detect the toxicant and avoid the areas.
   - Termites can not detect the presence of Premise (Imidacloprid) in the soil; therefore they readily enter treated areas and become exposed.
   - Non-repellent insecticides, like Premise, offer benefit, over repellent products, because insects do not avoid treated areas – become exposed and are controlled.
   - Many insects have the ability to detect pesticides that are introduced into their environment. The active ingredient in Premise (Imidacloprid) is not detected by insects, meaning that insects readily enter into treated areas and become exposed.
   - The biggest challenge with protecting structures, from termite attack, is to stop the millions of termites that could be foraging around the structure. Repellent termiticides rely on a perfect barrier to keep termites away, which is very hard to accomplish.

Protection with Premise doesn't rely on a perfect barrier as termites are killed rather than repelled.

- The long-lasting residual delivers effective termite and ant control.
- Premise delivers a dramatically lower retreat rate than pyrethroids.
- You can expect to retreat less than 1% of treated homes within the five years after treatment.
- Premise will provide years of protection from termite attack.
- The active ingredient in Premise (imidacloprid) has been proven to affect termites at extremely low levels in the soil.
- Research has shown that Premise affects termites, at very low levels of concentration in the soil. High concentrations of Premise will kill termites quickly, while lower concentrations also kill, but more slowly. This is an important attribute of Premise in that termites, exposed to these lower concentrations will die more slowly allowing time for them to return to the colony and pass the toxicant on to other termites.
- The active ingredient in Premise (Imidacloprid) is unique in that when applied to the soil it moves with the water and then binds to the soil, so it won't wash away. This is ideal, with a termiticide, in that the product initially moves, to fill in gaps, but then lock into place to provide the long-term protection that is needed.

2. All references to "transfer" or "Domino Effect" must be deleted from the label.

3. The label claim "Premise can be applied using many different formulations and application methods, making it the most versatile product available for termite control." is unacceptable and must be deleted from the label or revised to read "*Premise can be applied using many different formulations and application methods.*"

4. The label claim "*Insect can not detect the presence of Premise.*" is unacceptable and must be deleted or revised to read "*Listed insects can not detect the presence of Premise.*" or "*Termites and ants can not detect the presence of Premise.*"

5. The label claim "*The active ingredient in Premise (imidacloprid) is non-repellent meaning that insects can not detect where the active is applied.*" is not acceptable and must be deleted from the label or revised to read "*The active ingredient in Premise (imidacloprid) is non-repellent meaning that listed insects can not detect where the active is applied.*" or "*The active ingredient in Premise (imidacloprid) is non-repellent meaning that termites and ants can not detect where the active is applied.*"

6. The label claim "*Research has demonstrated that many insects can not detect the presence of Premise in soil or on surfaces. This is important in that insects do not avoid treated areas – become exposed and are controlled.*" is not acceptable and must be deleted from the label or revised to read "*Listed insects can not detect the presence of Premise in soil or on surfaces. This is important in that listed insects do not avoid treated areas – become exposed and are controlled.*" or "*Termites and ants can not detect the presence of Premise in soil or on surfaces. This is important in that termites and ants do not avoid treated areas – become exposed and are controlled.*"

7. The label claim "*The active ingredient in Premise (imidacloprid) has been proven to provide effective control on a broad range of pests, including termites and ants.*" is unacceptable and must be deleted from the label or revised to read "*The active ingredient in Premise (imidacloprid) has been proven to provide effective control of termites and ants.*"

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415.

Sincerely,

Venus Eagle

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

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Bayer Environmental Science

Premise® 2

Insecticide

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 regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites, drywood termites, dampwood termites, carpenter ants, and other wood-infesting insects.

ACTIVE INGREDIENT:	
Imidacloprid,1-[(6-Chloro-3-pyridinyl)methyl]-*N*-nitro-2-imidazolidinimine	21.4%
INERT INGREDIENTS:	78.6%
Total:	100.0%

Contains 2 pounds of imidacloprid per gallon.

Shake well before using.

EPA Reg. No. 432-1331 **EPA Est. No. 11556-KS-1, 3125-MO-1, 264-MO-2, 432-TX-1**

Stop - Read the label before use.
Keep out of reach of children.

CAUTION

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

(TO THE USER: If you cannot read or understand English, do not use this product until the label has been fully explained to you.)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed, inhaled, or absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children or pets away from treated area until dry.

When treating adjacent to an existing structure, the applicator must check the area to be treated, and immediately adjacent areas of the structure, for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean up is completed.

Personal Protective Equipment

All pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks, shoes must be worn. In addition: all pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL 19 2007

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 432-1331

FIRST AID	
If Swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on Skin or Clothing	• Take off contaminated clothing • Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in Eyes	• Hold eyelids open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE 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 1-800-334-7577 for emergency medical treatment.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat patient symptomatically.	

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to 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. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treatment area (site) is likely to occur.

DIRECTIONS FOR USE

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

Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated area, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Do not formulate this product into other end-use products.

MIXING: Refer to Mixing Table for proper amount of PREMISE 2 Insecticide to be used.

Mix the termiticide use dilution in the following manner. Fill tank ¼ to 1/3 full. If using large sprayer, start pump to begin bypass agitation and place end of treating tool in tank to allow circulation through hose. Add appropriate amount of PREMISE 2 Insecticide. Add remaining amount of water. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

MIXING TABLE FOR PREMISE 2 INSECTICIDE			
GALLONS WATER		**0.05%**	**0.1%**
10	**PLUS**	80 mL	160 mL
5		40 mL	80 mL
2		16 mL	32 mL
1		8 mL	16 mL

MIXING TABLE FOR PREMISE 2 INSECTICIDE			
GALLONS WATER		**0.05%**	**0.1%**
100	**PLUS**	27.5 fl oz	55.0 fl oz
50		13.8 fl oz	27.5 fl oz
25		6.9 fl oz	13.8 fl oz
1		0.3 fl oz	0.6 fl oz

[FOR 240 mL SIZE ONLY]* [FOR 55 FL OZ SIZE ONLY]*

*Contingent on container size, only one or the other of the tables will be used.

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PROPORTIONAL INJECTOR MIXING TABLE FOR PREMISE 2 INSECTICIDE	
INJECTOR VOLUME (fl oz/gal)	CONCENTRATION (%)
0.3	0.05
0.6	0.10

IN-LINE-INJECTION: For the desired application rate, use the proportional injector mixing table to determine the amount of PREMISE 2 Insecticide for a given injection volume of finished emulsion.

CONVERSION KEY: 128 fl oz = 1 gal, 16 fl oz= 1 pint, 8 pints = 1 gal, 1 fl oz = 29.5 mL

APPLICATION VOLUME

It is recommended that application volumes described in the PREMISE 2 Insecticide "DIRECTIONS FOR USE" be used whenever possible. However, where soil conditions will not accept application of 4 gallons of PREMISE 2 Insecticide per 10 linear feet, twice the PREMISE 2 Insecticide concentration may be applied in 2 gallons of solution per 10 linear feet. For example, if 0.05% is the correct use rate to be applied in 4 gallons of water, then 2 gallons of 0.1% dilution may be used per 10 linear feet to deliver an equivalent amount of PREMISE 2 Insecticide per unit of soil.

CONTROL - GENERAL

Treatment standards for subterranean termite control may vary due to regulations, treatment procedures, soil types, construction practices and other factors. The purpose of chemical soil treatment for termite control is to establish a continuous chemical treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in the structure and the termite colonies in the soil. Follow all federal, state, and local regulations and treatment standards for protection of a structure from termites. In some instances where an aerial or above ground colony is established, supplemental treatments to control the termites, landscape modifications, and/or structural repairs may be needed to deprive termites of a moisture source. Use a 0.05% to 0.1% dilution based on local recommendations. Generally a 0.05% dilution is used for typical control situations. Where severe or persistent infestations occur, a 0.1% dilution may be used.

PRE-CONSTRUCTION TREATMENT

Do not apply at a lower dosage and/or concentration than specified on this label for application prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

CONCRETE SLAB-ON-GROUND OR BASEMENTS: Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floor and entrance platforms. Apply at the rate of 1 gallon of solution to accurately and uniformly cover 10 square feet. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons or sufficient volume of solution, to accurately and uniformly cover 10 square feet. In addition, apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes should not extend below the footing. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat soil which will be placed in the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, use 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Rodding in trench followed by flooding of trench and treatment of backfill may provide a better opportunity to achieve a continuous chemical treated zone than using soil rodding alone to establish a vertical termiticide treated zone.

CRAWL SPACES: *Application must be made by trenching or trenching and rodding downward along the inside and outside of* foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone. Rodding may be done from the bottom of a shallow trench to top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

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HOLLOW BLOCK FOUNDATIONS OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil.

Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST-CONSTRUCTION TREATMENT

CONCRETE SLAB-ON-GROUND: To apply a treatment under the slab, including attached porches, carports, entrance platforms, garages and similar slab structures, it may be necessary to drill through the slab or exterior foundation. Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet per foot of depth to provide a uniform treated zone. DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

An application should be made by trenching or trenching and rodding around the outside of the foundation wall. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet per foot of depth to provide a uniform treated zone. When trenching, the trench along the outside foundation should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil as it is being placed in the trench.

Rodding can be done from the bottom of a shallow trench. When rodding, rod holes should be spaced in a manner that will allow for a continuous chemical treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod hole depth should not extend below the footing.

BATH TRAPS: Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas should be treated with 3 gallons of solution per square foot. An access door or inspection vent should be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil.

CRAWL SPACES: When there is insufficient clearance between floor joists and ground surfaces to allow applicator access, excavate, if possible, and treat according to crawl spaces (refer to Pre-Construction Treatment). If unable to excavate, crawl space soil and wood treatment may be used to prevent surface access by termites. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform chemical treated zone. Use a very coarse spray at a pressure not exceeding 25 PSI at the treatment tool when the valve is open.

Where a crawl space cannot be reached with the application wand, use extension wands or other suitable equipment to apply a coarse spray on the soil, wood and structural members contacting the soil at the above rates. Do not apply to inaccessible crawl space areas using pressures greater than 25 PSI at the treatment tool when the valve is open.

Treatment may also be made by drilling through the foundation wall or through the floor above and treating the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

To prevent subterranean termites from constructing mudtubes between soil and crawl space wood members above, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform chemical treated zone.

SHALLOW FOUNDATIONS: For shallow foundations, one foot or less in depth, dig a narrow trench approximately 6 inches wide and deep along the outside and inside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to the top of footer to provide a uniform treated zone. The dilution should be applied to the trench and mixed with the soil as it is placed in the trench.

BASEMENTS - OUTSIDE PERIMETER: Along the outside of the exterior walls, an application must be made by trenching or rodding within the trench. Rodding depth should be to the top of the footer, or to a minimum of 4 feet or according to state or local regulations. When rodding through a trench, dig a narrow trench about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform treated zone by rodding through the trench. Use a low pressure spray to treat soil which will be placed into the trench after rodding. Mix spray solution with the soil as it is being placed in the trench.

BASEMENTS - INSIDE PERIMETER: If necessary, treat by drilling along the perimeter of the interior walls. Applications also may be necessary around sewer pipes, floor drains, conduits, expansion joints or any cracks or holes in the basement floor. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to provide a uniform treated zone.

Drill holes should be spaced in a manner that will allow for application of a continuous chemical treated zone. Plug and fill all drill holes in commonly occupied areas of the building with a suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

HOLLOW BLOCK FOUNDATION OR VOIDS: Hollow block foundations or voids in masonry resting on the footing may be treated to provide a continuous chemical treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations which may apply.

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Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

PLENUMS: For plenum-type structures which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure, apply the dilution at the rate of 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth of soil to provide a uniform treated zone adjacent to both sides of foundation walls, supporting piers, plumbing and conduits. The soil should be treated by trenching to a depth of 6 inches or trenching and rodding (where conditions permit) or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application will be made at a rate of 1.5 gallons of solution per 10 square feet as a very coarse spray under low pressure (not to exceed 25 PSI when measured at the treating tool when valve is on).

When treating plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

TREATMENT AROUND WELLS OR CISTERNS: Do not contaminate wells or cisterns.

Structures With Wells/Cisterns Inside Foundations: Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not apply within 5 feet of any well or cistern by rodding and/or trenching or by the backfill method. Treat soil between 5 and 10 feet from the well or cistern by the backfill method only. Treatment of soil adjacent to water pipes within 3 feet of grade should only be done by the backfill method.
   a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
   b) Treat the soil at the rate of 4 gallons of solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
   c) After the treated soil has absorbed the solution, replace the soil into the trench.
2. Treat infested and/or damaged wood in place using an injection technique such as described in the "Control of Wood Infesting Pests" section of this label.

Structures With Adjacent Wells / Cisterns and/or Other Water Bodies: Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
2. Prior to treatment applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize off-site movement of termiticide.

Exterior Perimeter/Interior Spot Treatment

GENERAL INFORMATION

Exterior Perimeter/Interior Spot Treatment is an optional method of termite treatment only for use in post-construction applications, after the final grade is established. Structural protection when using the Exterior Perimeter/Interior Spot Treatment is accomplished by: 1) establishing a continuous treated zone around the entire exterior foundation wall of the building; and 2) spot-treating infested areas on the building interior. Soil adjacent to the exterior foundation wall must be treated in the same manner as conventional (full) application. It is required that a complete and continuous treated zone be achieved around the entire exterior perimeter, including under any attached slabs such as garages, porches, patios, driveways and pavement adjoining the foundation. Interior spot treatments must then be made to any indoor areas where termite activity is present. Optional interior spot treatments may also be made to high risk areas including, but not limited to, plumbing and utility penetrations (including bath traps), along settlement cracks and expansion joints, and dirt-filled porches.

Exterior Perimeter/Interior Spot Treatment can be used either as a preventative treatment (before structural infestation occurs) or as a curative treatment (after structural infestation occurs) in existing structures. Preventative treatment does not include pre-construction applications made to protect new construction. It is required that a thorough structural inspection be completed, before treatment, to locate all areas of active infestation. Spot treatment of all known sites of termite activity is required with this optional labeling. If no termite activity is observed inside the structure, interior spot treatments are not required. Do not apply at a lower dosage and/or concentration than specified on this label.

EXTERIOR PERIMETER TREATMENT

It is required that all structures, regardless of the type of construction, be protected by establishing a vertical treated zone along the outer perimeter of the foundation wall. Consult the OUTER FOUNDATION WALLS section of this label (see below) for detailed directions on this treatment procedure.

1. OUTER FOUNDATION WALLS: Application must be made by trenching, or where appropriate (see below) by trenching, or trenching and rodding from the bottom of the trench, around the outside of the foundation walls. When trenching, excavate a trench along the outside foundation that is about 6 inches wide and 6 inches deep. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth to provide a uniform vertical treated zone.

- For shallow foundations, one foot or less of depth, dig a narrow trench that does not exceed 6 inches wide and 6 inches deep along the outside of the foundation walls, being careful not to dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing.
- For basements and other foundations deeper than one foot, the application must be made by trenching and rodding from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. Rodding depth should be to the top of the footer, or to a maximum depth of 4 feet, or according to state or local regulations.

For all applications, apply the solution into the trench and mix with the excavated soil as it is replaced into the trench. Use a low-pressure spray to treat soil that will be replaced into the trench after rodding. Mix spray solution with the soil as it is being replaced in the trench.

Note: Where direct access to soil on the outer foundation wall is impossible due to attached porches, entrance platforms, garages and similar slab structures, consult the CONCRETE SLAB-ON-GROUND section of this label for directions on treatment of soil beneath these structures. However, where obstructions (e.g., concrete walkways) adjacent but not attached to foundation, or where soil type and/or conditions, prevent trenching the exterior perimeter treatment may be performed at the obstructed location by rodding alone. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not exceed 12 inches, to be deposited along the treated area.

2. CONCRETE SLAB-ON-GROUND: To treat soil beneath a slab, including attached porches, carports, entrance platforms, garages and similar slab structures abutting the foundation wall, it is necessary to drill through the slab. If an infestation is associated with an expansion joint, crack, utility penetration, or similar access point in the slab, treat by drilling and injecting through the slab. Drill holes must be spaced in a manner that will allow for application of a continuous chemical treated zone, but must extend a minimum of 3 feet on both sides of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet.
DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

3. INACCESSIBLE CRAWL SPACES: If termite activity is found along the perimeter wall or on a pier within an inaccessible crawl space, areas with termite activity must be treated. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site.
Optional directions for horizontal rodding: Treatment may also be made by drilling through the foundation wall (or through the floor above) to treat the soil along the perimeter wall at a rate of 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have shorter intervals so check state regulations which may apply. If termite activity is neither along the perimeter wall nor on a pier within the inaccessible crawl space, to prevent subterranean termites from constructing mud tubes between soil in the crawl space and wooden elements in the structure, an overall soil treatment of this product may be applied. Remove all cellulose debris before application. Apply 1 gallon of solution (see APPLICATION VOLUME) per 10 square feet to provide a uniform chemical treated zone.

4. ACCESSIBLE CRAWL SPACES: If termite activity is found within an accessible crawl space, the area(s) where termite activity exist must be treated by trenching, or trenching and rodding from the bottom of the trench, along the interior foundation walls, around piers, interior supports in contact with the soil, plumbing, or utility services. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet, per foot of depth, to create a vertical treated zone, which must extend a minimum of 3 feet on both sides of the infested site. Rodding may be done from the bottom of a shallow trench to the top of the footing or to a minimum of depth of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone, not to exceed 12 inches, to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, dig a narrow trench about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

INTERIOR SPOT TREATMENT

Targeted applications must be made to all known infested sites inside the structure. One or more of the following application methods must be used to make interior spot treatments:

- Sub-slab injections made through the slab at or near areas where termites are known to be penetrating the slab to reach wood in the structure and/or at or near sites of active infestations. Apply 4-gallons per 10 linear feet per foot of depth. Sub-slab injections must extend to a minimum of 3 feet on either side of every known infested site at expansion joints or cracks in slabs.
- Void treatments using injection of sprays, mists or foams into above ground structural voids, termite carton nests, and other infested locations.
- Wood treatments using injection techniques and/or surface applications, to treat active infestations in structural timbers.

To maximize dispersion of treatment solution in soil and in above ground locations, the use of foam and directional dispersion tips is encouraged for all interior spot treatments. Consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures.

1. INTERIOR SLABS: When termite activity is located within an interior wall or structural member, the soil beneath the slab and the wall void at this site of activity must be treated. The source of infestation at an expansion joint, crack, through a utility penetration, or similar access point in the slab, must be treated by drilling and injecting through the slab. Drill holes in the slab must be spaced in a manner that will allow for application of a continuous chemical treated zone, which must extend a minimum of 3 feet on either side of the infested site. Apply 4 gallons of solution (see APPLICATION VOLUME) per 10 linear feet. To maximize dispersion of treatment solution in soil, the use of foam and directional dispersion tips is encouraged. To treat the wall void, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures.
DO NOT MAKE TREATMENT UNTIL LOCATION OF HEAT OR AIR CONDITIONING DUCTS AND VENTS ARE KNOWN AND IDENTIFIED. USE EXTREME CAUTION TO AVOID CONTAMINATION OF DUCTS AND VENTS. Plug and fill all drilled holes in commonly occupied areas with suitable sealant. Plugs must be of non-cellulose material or covered by an impervious, non-cellulose material.

2. HOLLOW BLOCK FOUNDATION OR MASONRY VOIDS: Termite activity located within hollow-block foundations or masonry voids must be treated. Spot treatment at the site(s) of termite activity must extend a minimum of 3 feet on both sides. Treat masonry voids by applying 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Drill spacing in masonry voids must be at intervals not to exceed 16 inches; states may have shorter intervals so check state regulations which may apply. To maximize dispersion of treatment solution in voids, the use of foam and directional dispersion tips is encouraged. To treat structural voids above sites of termite activity in masonry, consult section(s) of this label appropriate to the element of construction, FOAM APPLICATIONS or CONTROL OF WOOD INFESTING PESTS for detailed directions on any of these treatment procedures. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

3. BATH TRAPS: If termite activity is observed within 2 feet of the bath trap, then exposed soil or soil covered with tar or a similar type of sealant around plumbing and/or drain pipe entry areas must be treated. Tar or sealant may have to be removed to allow for adequate soil treatment. An access door or inspection portal should be installed if one is not present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil at a volume of no less than 3 gallons of solution per square foot.

4. SHOWER OR FLOOR DRAINS: If termite activity is observed within 2 feet of a shower or floor drain in the slab, then soil beneath the drain must be treated. Drill through the slab adjacent to the drain and use sub-slab injection to apply solution to the soil. Multiple access points may be drilled adjacent to the drain. Treat soil at a volume of 1 gallon of solution per square foot.

FOAM APPLICATIONS

Construction practices, soil subsidence and other factors may create situations in which a continuous chemical treated zone cannot be achieved using conventional treatment alone. In situations where necessary, conventional application methods can be supplemented through use of foam generating equipment, or similar devices, to provide a continuous treated zone.

*Contingent on container size, only one or the other of the other of the tables will be used.

Foam application may be made alone or in combination with conventional application methods, provided that the labeled amount of active ingredient per unit area is used.

Foam Application Use Directions: Mix appropriate concentration of PREMISE® 2 Insecticide in water and add the manufacturer's recommended quantity of foam agent to the PREMISE® 2 INSECTICIDE solution (see table for foaming recommendations). Apply a sufficient volume of PREMISE® 2 Insecticide foam alone or in combination with liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

[FOR 240 ML SIZE ONLY]*

MIXING TABLE FOR PREMISE® 2 INSECTICIDE FOAM				
PREMISE 2 b (mL)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM	
			(gallons)	(ai%)
160	1	20:1	20	0.05
80	1	10:1	10	
40	1	5:1	5	
* Add the manufacturer's recommended quantity of foam agent to the PREMISE® 2 Insecticide solution				

[FOR 55 FL OZ SIZE ONLY]*

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MIXING TABLE FOR PREMISE® 2 INSECTICIDE FOAM				
PREMISE® 2 b (fl oz)	GALLONS OF WATER	FOAM EXPANSION RATIO	FINISHED FOAM	
			(gallons)	(ai%)
6.9	1	25:1	25	0.05
	2.5	10:1		
	5	5:1		
13.8	1	50:1	50	
	2.5	20:1		
	5	10:1		
* Add the manufacturer's recommended quantity of foam agent to the PREMISE® 2 Insecticide solution				

Depending on the circumstances, foam applications may be used alone or in combination with liquid solution applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, wall voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid applications must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the gallons of Premise® 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons is delivered to appropriate locations using a foam application.

NOTE: When foam is used solely to kill subterranean termites in above ground locations (such as feeding galleries in wooden framing, or in voids with framed walls), and whenever the target pest is other than subterranean termites (drywood termites, beetles, ants, etc.). dilute solutions of PREMISE may be expanded by foaming without concentrating the PREMISE solution as previously described for soil applications. Add the manufacturers' recommended volume of foaming agent to produce foam of the desired expansion ratio. Use application tips and methods suitable to the site and pest.

CONTROL OF WOOD INFESTING PESTS

For control of **above ground termites and carpenter ants** in localized areas, apply a 0.05 to 0.1% solution or sufficient volume of PREMISE® 2 Insecticide foam to voids and galleries in damaged wood, and in spaces between wooden structural members and between the sill plate and foundation where wood is vulnerable. Applications may be made to inaccessible areas by drilling, and then injecting the suspension or foam with a suitable directional injector into the damaged wood or wall voids. Termite carton nests in building voids may be injected with a 0.05 to 0.1% suspension or foam. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such nests are found. Application to attics, crawl spaces, unfinished basements, or man-made voids may be made with a coarse fan spray of 0.05 to 0.1% solution or foam to control exposed worker and winged reproductive forms of termites or carpenter ants. This type of application is intended to be a supplemental treatment for control of above ground subterranean termites and carpenter ants.

It is recommended to remove or prune away any shrubbery, bushes, and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure. This may allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of Premise® 2 can be made to theses nests.

Use a 0.05% to 0.1% solution to control existing infestations of or to prevent infestation by termites or carpenter ants in trees, utility poles, fencing and decking materials, landscape timbers and similar non-structural wood-to-soil contacts. If possible, locate the interior infested cavity and inject a 0.05 to 0.1% solution or sufficient volume of PREMISE® 2 Insecticide foam using an appropriate treatment tool with a splashback guard. These non-structural wood-to-soil contacts may also be treated by applying a solution* to the soil as a spot application or continuous treated zone applied as a drench or by rodding around the base of the point(s) of soil contact(s). Rod holes should be placed approximately 3 inches away from the soil contact point(s) and spaced no more than 12 inches along the perimeter of the soil contact(s). For small poles or posts (< 6 inches in diameter), apply 1 gallon per foot of depth. For larger constructions, apply 4 gallons per 10 linear feet per foot of depth. Retreat as needed to maintain protection.

Termite carton nests in trees may be injected with a 0.05 to 0.1% solution or sufficient volume of foam using a pointed injection tool. Multiple injection points to varying depths may be necessary. Removal of carton material from trees is desirable but may not be necessary when foam application is used. In some instances, a perimeter application of a 0.05% to 0.1% solution applied to soil around the root flare of the tree may be necessary to prevent reinfestation by termites in the soil. For small trees (< 6 inches in diameter), apply 1 gallon of solution. For larger trees, apply 4 gallons per 10 linear feet (measured as the circumference at the root flare).

For protection of **firewood or other wood** products stored in contact with soil from carpenter ants and termites, treat soil prior to stacking with a 0.05 to 0.1% solution at 1 gallon per 10 square feet to prevent infestation. Curative application to the soil around firewood or other wood products stored in contact with soil may be made as described for non-structural wood-to-soil contacts (above).

Drywood termites and wood-infesting beetles or borers (such as, but not limited to, powder post beetles, anobiid or deathwatch beetles, false powder post beetles, old house borers, wharf borers, or ambrosia or bark beetles). **Galleries and structure voids** can be treated with sprays, mists, or foams of a 0.05% to 0.1% PREMISE solution. Locate galleries by using visual signs (frass or pellets, blistered wood, emergence or clean out holes), the presence of live insects, mechanical sounding techniques, or listening devices (e.g., stethoscopes, acoustic emission detectors). Penetrate the gallery system by drilling holes to receive the injector tip or treatment tool. Distribute drill holes to adequately cover the gallery system. [NOTE: Avoid drilling where electrical wiring, plumbing lines, etc. are located.] Apply PREMISE solutions as a low pressure (about 20 psi) spray or by misting or, where appropriate, by foaming. It is not

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necessary to treat to the point where runoff is detected from adjacent holes. [NOTE: Do not apply where electrical shock hazards exist.] Drill holes should be sealed after treatment. Also, **wood surfaces** can be sprayed or misted with a 0.05% to 0.1% solution or, where appropriate, use a sufficient volume of foam. For inaccessible surfaces, drill and treat the interior of structural voids. Surfaces treated may include exposed wooden surfaces in crawlspaces, basements, or attics, wooden exterior surfaces such as decks, fencing, or siding, structural voids, channels in damaged wood, in spaces between wooden members of a structure, and junctions between wood and foundations. Apply by brushing or as a coarse, low pressure (about 20 psi) spray to the wood surface; apply sufficient volume to cover the surface to the point of wetness, but avoid applying to the point of runoff. When spraying overhead in living areas, cover surfaces below the treated area with plastic sheeting or similar material. Avoid contact with treated surfaces until spray deposits have dried. Retreat as needed to maintain protection.

Localized treatment for carpenter bees: Apply a 0.05% to 0.1% solution as a spray or mist, or sufficient volume of foam, directly into gallery entrance holes. Following treatment, entrance holes may be plugged with small pieces of steel wool or similar material.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the treated zone due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide treated zone in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the treated zone. Retreatment may be made as either a spot or complete treatment.

When a structure is not known to be reinfested and the treated zone is not disturbed, but where the structure was last treated five or more years ago, retreatment may be performed if, in the judgement of the applicator, it is necessary to ensure adequate protection of the structure. In determining the timing of any retreatment, the applicator should consider efficacy and/or degradation data and/or site-specific conditions and previous experience that indicate a vulnerability of the structure to termite attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

When another registered termite control product/system is used as the primary treatment for prevention or control of subterranean termites and is applied to all label-specified areas, PREMISE may be applied as a spot application in a secondary treatment to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks, the outside foundation wall, and areas of known or suspected activity at either a pre-construction or post-construction timing. These secondary treatments must be made applied in amounts and concentration in accordance with label directions relevant to the treatment area(s) to receive the secondary treatment.

For control of ants in houses and other structures, apply a 0.05 to 0.1% solution as a general surface, spot crack and crevice or wall void application. Apply to surfaces on buildings, porches, patios and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or drilled holes) where these pests enter the structure or where they crawl or hide. Spray into cracks and crevices. Spray, mist or foam into voids where these ants or their nests are present. Apply the volume of spray mist or foam sufficient to cover the area, but do not allow excessive dripping or run-off to occur from vertical or overhead surfaces.

Treat soil, turf or ground cover adjacent to the structure where ants are trailing or may find food or harborage. Apply to flower, shrub or ornamental plant beds adjacent to the structure where ants may find food or forage. To control ants tunneling in soil apply a 0.05% to 0.1% solution as a drench or soil injection at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

Aerial Nests: If ant nests are located in tree hollows or non-structural wooden construction(e.g.; posts, fences, decks) treat the interior cavity and/or the nest site by injecting a 0.05%-0.01% solution as a spray mist, or sufficient volume of foam.

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

Do not allow residents or pets into the immediate area during the application or contact with treated areas until spray has dried. Interior applications for ant control are limited to spot, crack and crevice, or wall void applications only.

Do not use this product against native or imported fire ants, pharaoh or harvester ants.

NOTE: Where severe pest pressures may exist and when rapid knockdown or exclusion at pest entry points is desired, supplemental treatments using PREMISE with targeted applications of a pyrethroid such as TEMPO® SC ULTRA or SUSPEND® SC to doors and windows, utility entry points, and other places where theses pests enter the structure. Read and follow all label directions for use of this companion product.

GENERAL PRECAUTIONS FOR APPLICATIONS

After treatment, plug and fill all holes drilled in concrete slab areas of the building with a suitable sealant.

Do not apply solution until location of heat pipes, ducts, water and sewer lines and electrical conduits are known and identified. Caution must be taken to avoid puncturing and injection into these structural elements.

Do not plant for the purpose of consumption, edible plants into the treated areas of soil.

Avoid contamination of public and private water supplies.

Use anti-backflow equipment or an air gap on filling hoses.

Consult State, Federal, or local authorities for information regarding the approved treatment practices for areas in close proximity to potable water supplies.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store water soluble packets in original container and out of reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking, invert to prevent leakage. If container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticide below. In spill or leak incidents, keep unauthorized people away. You may contact the Bayer Environmental Science Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Bayer Environmental Science Emergency Response Telephone No. is 1-800-334-7577 or contact Chemtrec at 800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of liability before using this product.

If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond Bayer Environmental Science's control it is impossible for Bayer Environmental Science to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER ENVIRONMENTAL SCIENCE MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer Environmental Science is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, Bayer Environmental Science disclaims any liability whatsoever for special, incidental or consequential damages, resulting from the use or handling of this product.

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Premise® 2 Insecticide is specially formulated and sold by Bayer Environmental Science USA LP for the control of insects according to the directions on this label. Bayer is the owner of United States patent rights to the active ingredient imidacloprid, formulations containing the active ingredient imidacloprid, formulations containing the active ingredient and methods of use, particularly U.S. Patent Nos. 4,742,060, 6,323,224 B1. The purchase price of Premise® 2 Insecticide under which purchase agrees to employ the purchased quantity of Premise® 2 Insecticide only for the above-specified uses under Bayer's United States patent rights and to provide notice of the terms and conditions of this license to any subsequent purchaser. Uses of Premise® 2 Insecticide other than those specified on this label are not licensed through the purchase of this product and the use of this product for other purposes may violate this license and patent rights of Bayer.

Total Net Contents: 48.7 fl oz

Produced for

Bayer Environmental Science

Bayer Environmental Science
A Business Group of Bayer CropScience LP
2 T. W. Alexander Drive
Research Triangle Park, NC 27709

Premise 2 (PENDING) Submitted to EPA 05-04-07

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List of Marketing Claims

Functional claims:

1. Premise can be applied using many different formulations and applications methods, making it the most versatile product available for termite control.
2. The active ingredient in Premise (imidacloprid) is the most widely used insecticide in the world.
3. You can trust Premise to protect you home. Over ten years of use, in the US, has proven that Premise can offer unsurpassed protection.
4. Your pest management professional trusts Premise to protect your home and you can too.
5. Premise has been used to protect millions of homes from termite attack.
6. Premise has been widely used, in the US, for over 10 years now with a proven track record for protecting structures from termite attack.

Claims of non-repellency:

7. Premise is a non-repellent insecticide.
8. Premise was the first non-repellent insecticide offered for termite control.
9. Insect can not detect the presence of Premise.
10. The active ingredient in Premise (imidacloprid) is non-repellent meaning that insects can not detect where the active is applied.
11. As a non-repellent, termites can not detect the presence of imidacloprid, at the upper or lower range of parts per million in the soil.
12. Premise is a non-repellent insecticide – insects don't know it is there, so they readily enter treated areas and become exposed.
13. Research has demonstrated that many insects can not detect the presence of Premise in soil or on surfaces. This is important in that insects do not avoid treated areas – become exposed and are controlled.
14. Premise is non-repellent to insect, which means that insects can not detect and avoid those areas where applied. Non-repellent products offer many advantages over repellent where insects detect the toxicant and avoid treated areas.
15. Termites can not detect the presence of Premise (imidacloprid) in the soil; therefore they readily enter treated areas and become exposed.
16. Non-repellent insecticides, like Premise, offer benefit, over repellent products, because insects do not avoid treated areas – become exposed and are controlled.
17. Many insects have the ability to detect pesticides that are introduced into their environment. The active ingredient in Premise (imidacloprid) is not be detected by insects, meaning that insects readily enter into treated areas and become exposed.
18. The biggest challenge with protecting structures, from termite attack, is to stop the millions of termites that could be foraging around the structure. Repellent termiticide rely on a perfect barrier to keep termites away, which is very hard to accomplish. Protection with Premise doesn't rely on a perfect barrier as termites are killed rather than repelled.

Insecticidal claims:

19. For prevention or control of subterranean termites, drywood termites, dampwood termites, carpenter ants, and other wood-infesting insects.
20. Premise controls all native and imported subterranean termite species.
21. Premise is effective against subterranean termites in the genera Reticulitermes, Coptotermes, Heterotermes and Zootermopsis.
22. Premise controls drywood termites.
23. Premise controls wood-destroying beetles.
24. The long-lasting residual delivers effective termite and ant control.
25. Premise delivers a dramatically lower retreat rate than pyrethroids.
26. You can expect to retreat less than 1% of treated homes within the five years after treatment.

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27. The active ingredient in Premise (imidacloprid) has been proven to provide effective control on a broad range of pest, including termites and ants.
28. Premise will provide years of protection from termite attack.
29. The active ingredient in Premise (imidacloprid) has been proven to affect termites at extremely low levels in the soil.
30. Research has shown that Premise affects termites, at very low levels of concentration in the soil. High concentrations of Premise will kill termites quickly, while lower concentrations also kill, but more slowly. This is an important attribute of Premise in that termites, exposed to these lower concentrations will die more slowly allowing time for them to return to the colony and pass the toxicant on to other termites.
31. The active ingredient in Premise (imidacloprid) is unique in that when applied to the soil it moves with the water and then binds to the soil, so it won't wash away. This is ideal, with a termiticide, in that the product initially moves, to fill in gaps, but then locks into place to provide the long-term protection that is needed.
32. Premise control termites in three ways:
    - Termites tunnel through treated soil – ingest the toxicant and are killed.
    - Termites directly contact the toxicant, while foraging, and are controlled from exposure to their bodies.
    - Termites are social insects in that they care for one another through grooming, nursing and the passing of food. Termites transfer the toxicant from insect to insect becoming exposed. In this way, one exposed termites can expose others to the toxicant. With Premise we refer to this as the Domino Effect®.

Transfer or "Domino Effect" claims:

33. Premise transfers throughout the colony by ingestion and contact so effectively that it eliminates entire termite populations in as few as seven days. It's this Domino Effect® of Premise that turns termites into killing machines.
34. Domino Effect® transfers Premise to untreated areas and maximizes control of all ant and termite species.
35. Termites walk or tunnel through treated areas, then carry Premise back to their nest mates. This way, one termite can help kill hundreds of others. That's the power of the Domino Effect®.
36. Premise is carried back to the colony by termites that have entered the Treated Zone.
37. Because termites constantly interact, a lethal dose is transferred to other termites through social interaction and cannibalism.
38. As with termites, the Domino Effect® turns foraging worker ants into lethal carriers as they unknowingly take Premise back to their colonies.
39. Research has shown that the active ingredient in Premise (imidacloprid) can be passed from a exposed termite to a unexposed termite through their normal social activities, such as grooming and the passing of food.
40. Premise offers the Domino Effect® in that termites that become directly exposed can pass the toxicant on to other termites that have not been directly exposed. This is an important mechanism for controlling termites as many termites never leave the colony. Termites that have foraged into treated areas carry the toxicant back to the colony.