

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Ms. Dana Thomas Whitmire Micro-Gen Research Laboratories Inc. 3568 Tree Court Industrial Blvd. St. Louis, MO 63122

OCT 2 4 2013

Dear Ms. Thomas:

Subject:

Labeling amendment to add 6 month inspection interval

EPA Registration No. 499-557 Submission Date: May 24, 2013

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment.

Note: Should you wish to add a reference to the company's website on your label, please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have any questions regarding this label, please contact Jennifer Gaines at (703) 305-5967, or by email at <a href="mailto:gaines.jennifer@epa.gov">gaines.jennifer@epa.gov</a>.

Sincerely yours,

Reuben Baris

Acting Product Manager (07) Insecticide-Rodenticide Branch Registration Division (7505P) (CONTAINER (CARTRIDGE) LABEL1

[Text in this is color may be print-restricted.]

[Text in this color is Alternate Labeling for Direct Baiting only label.]

[Text in this color is Alternate Labeling for Above Ground Station only label.]

TC 283

[Alternate Brand Name: TRELONA™] {applying for via Notification} [Descriptor: Compressed Termite Bait]

EPTE 10/22/13); dn OCT 2 4 2013

Under the Federal Insecticide. Fungicide, and Rodenticide Act as amended, for the pesticide Registered under EPA Reg. No. 499

- Termite Bait Cartridge (TBC) [Compressed Termite Bait] [Termite Bait Container] [Inner Bait Tray (IBT)]
- 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.
- A termite bait that may be used in an integrated management program for the protection of structures against subterranean

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OTHER INGREDIENTS: \_\_\_\_\_\_\_99.50%

\*Contains 0.5g of novaluron per 100g of formulation U.S. Patent Pending

EPA Reg. No. 499-557 • EPA Est. No(s). 7969-MO-2

# CAUTION **KEEP OUT OF REACH OF CHILDREN**

See complete label for First Aid, additional Precautionary Statements, Directions for Use and Storage and Disposal.

NET WEIGHT:

Manufactured for: Whitmire Micro-Gen Research Laboratories, Inc. by BASF Corporation 3568 Tree Court Industrial Blvd. St. Louis, MO 63122-6682

v3.0.2 (10/22/13; dmt)

[COMPLETE LABEL]

[Text in this color may be print-restricted.]
[Text in this color is Alternate Labeling for Direct Baiting *only* label.]
[Text in this color is Alternate Labeling for Above Ground Station only label.]

# TC 283

[Alternate Brand Name: TRELONA™ HT] {applying for via Notification} [Descriptor: High Transfer Termite Bait]

- Termite Bait Cartridge (TBC) [Compressed Termite Bait] [Termite Bait Container] [Inner Bait Tray (IBT)]
- 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.
- A termite bait that may be used in an integrated management program for the protection of structures against subterranean termites.

**ACTIVE INGREDIENT:** 

Novaluron: 1-[3-chloro-4-(1,1,2-trifluoro-2-trifluoro-methoxyethoxy) phenyl] -3-(2,6-difluorobenzoyl) urea\* 0.50%

OTHER INGREDIENTS: 9950%

\*Contains 0.5g of novaluron per 100g of formulation U.S. Patent Pending

EPA Reg. No. 499-557 • EPA Est.No(s), 7969-MO-2

# KEEP OUT OF REACH OF CHILDREN CAUTION

#### **FIRST AID**

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15 – 20 min. Remove contact lenses, if present, after the first 5 min, then continue rinsing. Call a poison control center or doctor for treatment advice.

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-xxx-xxxx for emergency medical treatment information.

#### PRECAUTIONARY STATEMENTS

# HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

### **ENVIRONMENTAL HAZARDS**

The active ingredient in this product is extremely toxic to aquatic invertebrates. Do not place in any area where, because of the movement of water, it could be washed into a body of water containing aquatic life, such as ponds or streams.

Important: Before buying or using this product, read the entire label including the "Warranty" section [Alternate Language: "Warranty Disclaimer", "Inherent Risks of Use" and "Limitation of Remedies" sections] of this label. If terms are not acceptable, return the unopened product container at once. Use this product only according to label directions.

# **DIRECTIONS FOR USE**

# IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Read the PRODUCT INFORMATION and DIRECTIONS FOR USE carefully before using. TRELONA is part of a termite baiting system and is intended for use in [ADVANCE® Termite Bait System (ADVANCE® TBS [Alternate brand name] bait stations which may be purchased from most professional pest control product distributors. Use of this product involves the installation of bait stations and the subsequent monitoring and replenishment of pre-bait monitors and bait. When the system is inspected and replenished per label instructions, it provides on-going prevention and elimination of termite colonies. Use of this bait in any other type of station or system not approved by Whitmire Micro-Gen or BASF is prohibited. Call 1-800-777-8570 for assistance in using this product or any other components of the termite baiting system.

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[Text in this color is Alternate Labeling for Above Ground Station only label.]

# PRODUCT INFORMATION

The active ingredient, novaluron, is an insect development inhibitor. When consumed by a termite, novaluron impairs the ability of a termite to properly synthesize chitin and inhibits the termite's ability to molt. Molting is the process by which termites, at certain points in their development, shed their existing exoskeleton and form a replacement exoskeleton. Termites that attempt to molt after ingesting an amount of bait sufficient to impair their molting process either die or are incapacitated by their inability to complete the molting process. Insect development inhibitors such as novaluron are characterized as slow acting toxicants, however their action is slow only when they affect a termite at the point in its life cycle when it molts. Because all the termites in a colony do not molt at the same time, the effect of novaluron on the colony as a whole is progressive. This progressive effect is one of the key attributes of novaluron enabling termite colony effects.

Sufficient consumption of bait by a termite colony can cause a decline in the number of colony members. Such a decline, if sustained by continued consumption of bait by the colony, can significantly impair the colony vitality. Further, continued consumption of bait by remaining colony members may ultimately result in the total elimination of the colony. The extent of the decline of the colony, the speed of its decline and the possibility of its elimination depends upon the extent to which bait is made continuously available to a colony for consumption and the extent to which members of the colony consume it. Adherence to the DIRECTIONS FOR USE can increase the likelihood of colony elimination, however conditions or circumstances beyond the control of the user may prevent or substantially delay colony elimination. Such conditions may include, but are not limited to, alternate non-bait food sources that reduce the extent to which the colony depends on the bait as a food source, excess moisture, low or high temperatures or abandonment of feeding on the bait by the colony.

# IN GROUND DIRECTIONS FOR USE

This product is intended for use in an ongoing program of management and control of subterranean termite colonies in the ground around and under any type of building or other object (structure). It does not exclude termites from a structure. Instead, it suppresses or eliminates termite colonies. It affects termite colonies only if they consume it. Therefore, sufficient consumption of bait by all subterranean termite colonies that present an existing or potential hazard to the structure may, subject to the limitations stated herein, protect the structure against subterranean termite attack.

If the cycle of pre-baiting and baiting around a structure is interrupted or discontinued, new colonies occupying the territory of suppressed or eliminated colonies, existing colonies that were suppressed but not eliminated, existing colonies never baited or colonies that were pre-baited may forage at points of possible entry into and infest the structure. For this reason, maintain the cycle of pre-baiting and baiting or offer continuous bait for as long as it is desirable to suppress or eliminate subterranean termites.

If a soil applied - liquid or granular- termiticide treatment is performed in conjunction with an installation of the bait system, do not treat in the area of installed stations (preferably not within 2 ft of stations). Because the use of bait may be a multi-step process, localized treatment(s) of areas of the structure infested with active termites at the time of pre-baiting or baiting, using soil applied termiticides may provide more immediate control of termites in those parts of the structure than bait. Preventative critical area soil or wood treatments may be performed in conjunction with station installation. Do not treat in areas of installed stations during routine pesticide applications.

# PRE-BAIT MONITORING / DIRECT BAITING

Pre-bait monitoring is a process by which termite activity is established at a location prior to the application of bait at that location. Once they have consumed the pre-bait, termites can normally be induced to consume the bait. These termites then attract other colony members to the bait station where they, in turn, also consume the bait. Use WMG/BASF approved pre-bait monitors to establish activity in the station. If there is termite activity in a pre-baited station, make bait continuously available for colony consumption by placing bait in the station and replenishing consumed amounts of bait for as long as termite activity is present in the station. See section entitled "INSPECTING A STATION AND PLACING BAIT" for details. Alternatively, bait can be placed in stations at any time prior to termite activity (DIRECT BAITING), with or without the presence of termites.

# **PRE-CONSTRUCTION USE**

In Florida, do not use as a stand-alone preventative treatment for new construction.

This product can be used for preventative treatment (before signs of infestation) of structures under construction or newly completed (as a substitute for, and in lieu of, pre-construction soil treatment). [ALTERNATE LANGUAGE: "In [state name(s)], where pre-construction use of bait only is prohibited, this product may be used in conjunction with, but not in lieu of, pre-construction soil treatment.] Place stations around the outside of the structure only after the final exterior grade is installed (and preferably after landscaping is completed).

# **POST-CONSTRUCTION USE**

This product can be used for remedial treatment of infested existing structures or for preventative treatment (before signs of infestation) of existing structures.

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# STATION LOCATION SELECTION

To reduce the potential for tampering with and disturbance of stations, choose points of station installation that minimize installed station visibility. Do not place product in areas where barrier type termiticides are known to have been previously applied, such as within 2 ft of the foundation wall.

Choose areas for station installation located at or near points of known or suspected termite entry into the structure. If a point of accessible ground is not located within 10 ft of a point of known termite entry (due to an intervening hardened construction surface such as a concrete slab). it may be advisable to create an access to the ground through that surface close to the point of known entry and install a station at that access.

Once termite activity has occurred at a station and bait consumption has begun, it may be advisable, depending on the rate of bait consumption in that station and nearby stations, to locate 1 or more supplemental stations in the immediate vicinity (up to 5 ft ) of the infested station(s) in order that bait consumption by the colony be maximized.

### STATION INSTALLATION

To install a station, excavate or form a hole in the ground approximately the same size and dimensions as those of the station, Insert the station into the hole. Maximizing contact between the exterior of the station and the earth during installation will increase the probability of termite entrance into the station. If the station is inserted into an opening created through a hardened construction surface (such as a concrete slab, asphalt, etc.), insert station below the surface (in contact with the ground) and seal securely.

Install stations at, or preferably within approximately 5 ft of points of known, probable or suspected termite foraging, and at other critical areas. Such areas may include areas with concentrations of cellulose-containing debris, such as mulch or wood scraps, in contact with the ground, areas of moderate soil moisture, shaded areas, areas containing plant root systems, bath traps, visible termite foraging tubes, etc. Install stations around a structure such that, except where sufficient access to the ground is not available, the maximum interval between any 2 stations does not exceed 20 ft. If the distance between 2 points of accessible ground around the structure exceeds 30 ft. it may be advisable to form 1 or more openings in the surface creating the inaccessibility to facilitate baiting between those points.

If the structure has an accessible crawl space, stations can be installed in the crawl space in lieu of or in addition to installing stations around the structure. Stations can be installed within a slab structure at existing or created openings in the slab surface through which ground is accessible and into which the station can be installed in a secure manner.

#### PRE-BAIT MONITORING SERVICE ROUTINE

The pre-bait monitoring service routine is to be followed if an operator is using pre-bait monitors followed by bait placement as needed, or direct baiting only select stations around a structure.

### Inspecting a Station and Placing Bait

To inspect a station, remove the cover and visually examine the interior for the presence of termites, being careful to minimize disturbance of the termites, if present. If live termites are present in the station, place bait into the station. If it appears, upon reinspection, that >1/2 of the bait has been consumed, replace the bait. If termites are not present, inspect bait or pre-bait for excessive decay or moisture saturation. Replace excessively decayed bait or pre-bait. Replace the station cover securely.

If termites have not been present in the station for approximately 60 days, any remaining bait may be removed. If bait is removed, clean out station and replace with monitor (pre-bait) or bait. Alternatively, bait may remain in the station if it is in good condition and >1/2 remains. If termites have abandoned the station, possibly due to reductions in termite activity related to low temperatures during the period of predicted limited termite activity (see "ADJUSTMENTS TO INSPECTION SCHEDULING"), it may be advisable to leave the station and bait in place and recheck the station again after the period of predicted limited termite activity has elapsed before removing and replacing the bait. If termites have permanently abandoned the station due to excessive moisture, remove the saturated bait and re-bait the station with fresh bait at that time or after the excess moisture condition has abated.

If a station, upon repeated inspection, is found to contain excess moisture (water standing at the bottom of the station or cavity, etc.), relocate the station, if possible, to a nearby area where the soil is better drained or alternately, modify the station location to prevent water from collecting in the station by, for example, creating a sump area under the installed station or at the bottom of the cavity.

# Scheduling of Inspections

Initial Inspection: If termite activity is known to be present in or on the structure at the time the stations are initially installed, inspect all stations at 60 days after the date of completion of the initial station installation. If no termite activity is present in or on the structure at the time stations are initially installed, inspect all stations for the first time 120 days after the date of completion of initial station installation. Thereafter, inspect stations at 120 days after the date of the last inspection of the stations. After feeding has stopped, or there has been no activity for one year monitor the stations every 6 mo. If activity returns, place bait in the active station(s) and monitor every 120 days or 4 mo. Stations may be inspected more frequently ("additional inspections") than prescribed, if desired,

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# ADJUSTMENTS TO INSPECTION SCHEDULING

Decreases in elapsed time between inspections of a baited station may be warranted if consumption of all the bait in the station occurs during the interval between any two inspections.

Because subterranean termites are cold-blooded (poikilothermic) animals, low temperatures can substantially reduce or stop their activity close to the earth's surface during a certain period of the year. For this reason, if the temperature falls low enough, termites may cease to feed in stations or the onset of feeding in stations may be delayed until temperatures have recovered above a certain level for a long enough period of time. Reductions in termite activity that are the result of low temperatures may make inspections of stations unnecessary for as long as low temperatures prevail in the area.

The temperature at which termite activity is substantially curtailed may vary significantly between different geographic areas and with different species of termites. However, generally speaking, termite activity will be reduced in the stations during those times of the year during which the average daily mean exterior air temperature is below 50°F. The operator should always make allowances for local circumstances when considering increasing elapsed time between inspections. Under no circumstances should more than 6 mo elapse between inspections of stations. If inspection interval is on 6 mo cycle, under no circumstances should more than 8 mo elapse between inspections.

Do not allow extra time between inspections if stations are located in an area in or under a structure in which the average daily mean air temperature is expected to remain above 50°F and termites are actively consuming bait in the stations. Inspection intervals must comply with state regulations, where applicable.

#### SUPPLEMENTAL TREATMENT

This product can be applied or used as a supplemental treatment in, underneath, and/or around structures or buildings to kill termites in support of, or as a supplement to, a termiticide product labeled for and applied as a stand-alone termiticide treatment. This includes preand post-construction soil termiticide treatments labeled for providing structural protection. This product may also be used in combination with an additional termiticide treatment, as a supplemental treatment in areas not associated with structures or buildings, such as around trees, wood piles, landscaping elements, railroad track beds, and other areas where termite activity is known or suspected.

To provide a supplemental bait treatment, install one or more bait station(s), in the soil at or near points of known or suspected termite activity. Insert bait into the station(s) at the time of installation (DIRECT BAITING) or when termites are detected in or near a station. Baiting may be discontinued at any time at the discretion of the applicator. If continued effectiveness of the supplemental treatment is desired, stations should be inspected every 120 days.

# NON-STRUCTURE SPOT TREATMENT

This product can also be applied or used as a spot treatment in areas not associated with structures or buildings, such as around trees, wood piles, landscaping elements, railroad track beds and other areas where termite activity is known or suspected. Such treatments may be made alone or in combination with an additional termiticide treatment. Spot treatments made with this product are not intended to, and should not be used, as a sole means for providing non-structural protection.

Installation, baiting and monitoring of spot bait treatments made with this product should follow directions provided in the "SUPPLEMENTAL TREATMENT" section above.

[ALTERNATE DIRECTIONS FOR DIRECT BAIT ONLY PRODUCT ([Alternate brand name] sold only as a separate unit)]

# DIRECTIONS FOR USE

# IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Read the INFORMATION and USE DIRECTIONS carefully before using. TRELONA is part of a termite baiting system and is intended for use in ADVANCE Termite Bait System [ALTERNATE TEXT: above ground] bait stations which may be purchased from most professional pest control product distributors. [ALTERNATE LANGUAGE: "...intended for use in [BRAND NAME] system."] Use of this product involves the installation of bait stations pre-loaded with bait and the subsequent monitoring and replenishment of bait to make it continuously available at all times in all stations. When the system is inspected and replenished per label instructions, it provides on-going prevention and elimination of termite colonies. Use of this product in any other type of station or system not approved by Whitmire Micro-Gen is prohibited. Contact Whitmire Micro-Gen at 1-800-777-8570 for assistance in using this product or any other components of the termite baiting system.

# PRODUCT INFORMATION

The active ingredient, novaluron, is an insect development inhibitor. When consumed by a termite, novaluron impairs the ability of a termite to properly synthesize chitin and inhibits the termite's ability to molt. Molting is the process by which termites, at certain points in their development, shed their existing exoskeleton and form a replacement exoskeleton. Termites that attempt to molt after ingesting an amount of bait sufficient to impair their molting process either die or are incapacitated by their inability to complete the molting process. Insect

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development inhibitors such as novaluron are characterized as slow acting toxicants, however their action is slow only when they affect a termite at the point in its life cycle when it molts. Because all the termites in a colony do not molt at the same time, the effect of novaluron on the colony as a whole is progressive. This progressive effect is one of the key attributes of novaluron enabling termite colony effects.

Sufficient consumption of bait by a termite colony can cause a decline in the number of colony members. Such a decline, if sustained by continued consumption of bait by the colony, can significantly impair the colony vitality. Further, continued consumption of bait by remaining colony members may ultimately result in the total elimination of the colony. The extent of the decline of the colony, the speed of its decline and the possibility of its elimination depends upon the extent to which bait is made continuously available to a colony for consumption and the extent to which members of the colony consume it. Adherence to the DIRECTIONS FOR USE can increase the likelihood of colony elimination, however conditions or circumstances beyond the control of the user may prevent or substantially delay colony elimination. Such conditions may include, but are not limited to, alternate non-bait food sources that reduce the extent to which the colony depends on the bait as a food source, excess moisture, low or high temperatures or abandonment of feeding on the bait by the colony.

# IN GROUND DIRECTIONS FOR USE

This product is intended for use in an ongoing program of management and control of subterranean termite colonies in the ground around and under any type of building or other object (structure). It does not exclude termites from a structure. Instead, it suppresses or eliminates termite colonies. It affects termite colonies only if they consume it. Therefore, sufficient consumption of bait by all subterranean termite colonies that present an existing or potential hazard to the structure may, subject to the limitations stated herein, protect the structure against subterranean termite attack.

If the cycle of baiting around a structure is interrupted or discontinued, new colonies occupying the territory of suppressed or eliminated colonies, existing colonies that were suppressed but not eliminated or existing colonies never baited may forage at points of possible entry into and infest the structure. For this reason, offer continuous bait for as long as it is desirable to suppress or eliminate subterranean termites.

If a soil applied - liquid or granular- termiticide treatment is performed in conjunction with an installation of the bait system, do not treat in the area of installed stations (preferably not within 2 ft of stations). Because the use of bait may be a multi-step process, localized treatment(s) of areas of the structure infested with active termites at the time of baiting, using soil applied termiticides may provide more immediate control of termites in those parts of the structure than bait. Preventative critical area soil or wood treatments may be performed in conjunction with station installation. Do not treat in areas of installed stations during routine pesticide applications.

# COMPLETE DIRECT BAITING

Complete direct baiting is a process which ensures TRELONA bait is made continuously available in all ADVANCE Termite Bait Stations [ALTERNATE LANGUAGE: "[BRAND NAME]"] from the time of station installation. Bait is installed from day one in all stations and made continuously available in all stations. For inspection and bait replacement details see section entitled "Inspecting A Station and Replacing Bait" and "Scheduling of Inspections".

#### **PRE-CONSTRUCTION USE**

# In Florida, do not use as a stand-alone preventative treatment for new construction!

This product can be used for preventative treatment (before signs of infestation) of structures under construction or newly completed (as a substitute for, and in lieu of, pre-construction soil treatment). [ALTERNATE LANGUAGE: "In [state name(s)], where pre-construction use of bait only is prohibited, this product may be used in conjunction with, but not in lieu of, pre-construction soil treatment.] Place stations around the outside of the structure only after the final exterior grade is installed (and preferably after landscaping is completed).

# **POST-CONSTRUCTION USE**

This product can be used for remedial treatment of infested existing structures or for preventative treatment (before signs of infestation) of existing structures.

#### STATION LOCATION SELECTION

To reduce the potential for tampering with and disturbance of stations, choose points of station installation that minimize installed station visibility. Do not place product in areas where barrier type termiticides are known to have been previously applied, such as within 2 ft of the foundation wall.

Choose areas for station installation located at or near points of known or suspected termite entry into the structure. If a point of accessible ground is not located within 10 ft of a point of known termite entry (due to an intervening hardened construction surface such as a concrete slab), it may be advisable to create an access to the ground through that surface close to the point of known entry and install a station at that access.

Once termite activity has occurred at a station and bait consumption has begun, it may be advisable, depending on the rate of bait consumption in that station and nearby stations, to locate 1 or more supplemental stations in the immediate vicinity (up to 5 ft) of the infested station(s) in order that bait consumption by the colony be maximized.

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# STATION INSTALLATION

To install a station, excavate or form a hole in the ground approximately the same size and dimensions as those of the station. Insert the station into the hole. Maximizing contact between the exterior of the station and the earth during installation will increase the probability of termite entrance into the station. If the station is inserted into an opening created through a hardened construction surface (such as a concrete slab, asphalt, etc.), insert station below the surface (in contact with the ground) and seal securely.

Install stations at, or preferably within approximately 5 ft of points of known, probable or suspected termite foraging, and at other critical areas. Such areas may include areas with concentrations of cellulose-containing debris, such as mulch or wood scraps, in contact with the ground, areas of moderate soil moisture, shaded areas, areas containing plant root systems, bath traps, visible termite foraging tubes, etc.

Install stations around a structure such that, except where sufficient access to the ground is not available, the maximum interval between any 2 stations does not exceed 20 ft. If the distance between 2 points of accessible ground around the structure exceeds 30 ft, it may be advisable to form 1 or more openings in the surface creating the inaccessibility to facilitate baiting between those points.

If the structure has an accessible crawl space, stations can be installed in the crawl space in lieu of or in addition to installing stations around the structure. Stations can be installed within a slab structure at existing or created openings in the slab surface through which ground is accessible and into which the station can be installed in a secure manner.

# Inspecting a Station and Replacing Bait

To inspect a station, remove the cover and visually examine the bait, being careful to minimize disturbance of the termites, if present. If it appears, upon inspection, that >1/2 of the bait has been consumed it may be advisable to replace the bait. Further inspect bait for excessive decay or moisture saturation. Replace bait that is excessively decayed. Replace the station cover securely.

# Scheduling of Inspections

If termite activity is known to be present in or on the structure at the time the stations are initially installed, inspect all stations at 60 days after the date of completion of the initial station installation. If no termite activity is present in or on the structure at the time stations are initially installed, inspect all stations for the first time 120 days after the date of completion of initial station installation. If evidence of termite feeding is found in any station or in or on the structure at this initial inspection, "mandatory" inspections must be made at 120 day intervals.

If no evidence of termite feeding is found in any station or in or on the structure after one year, "mandatory" inspections must be made at 180 day intervals. If termite activity resumes, inspect at 120 day intervals. The applicator may remove all the bait and replace it with termite inspection cartridges (TICs) and inspect on a 6 mo interval. If termite activity resumes in one or more stations, all stations must be baited and inspected on a 120 day interval. Stations may be inspected more frequently ("additional inspections") than prescribed, if desired.

# ADJUSTMENTS TO INSPECTION SCHEDULING

Decreases in elapsed time between inspections of a baited station may be warranted if consumption of all the bait in the station occurs during the interval between any two inspections.

Because subterranean termites are cold-blooded (poikilothermic) animals, low temperatures can substantially reduce or stop their activity close to the earth's surface during a certain period of the year. For this reason, if the temperature falls low enough, termites may cease to feed in stations or the onset of feeding in stations may be delayed until temperatures have recovered above a certain level for a long enough period of time. Reductions in termite activity that are the result of low temperatures may make inspections of stations unnecessary for as long as low temperatures prevail in the area.

The temperature at which termite activity is substantially curtailed may vary significantly between different geographic areas and with different species of termites. However, generally speaking, termite activity will be reduced in the stations during those times of the year during which the average daily mean exterior air temperature is below 50°F. The operator should always make allowances for local circumstances when considering increasing elapsed time between inspections. Under no circumstances should more than 6 mo elapse between inspections of stations. [ALTERNATE LANGUAGE for use when using Bi-annual Service language: "Under no circumstances should more than 8 mo elapse between inspections of stations

Do not allow extra time between inspections if stations are located in an area in or under a structure in which the average daily mean air temperature is expected to remain above 50°F and termites are actively consuming bait in the stations. Inspection intervals must comply with state regulations, where applicable.

Decreases in elapsed time between inspections of a baited station may be warranted if consumption of all the bait in the station occurs during the interval between any two inspections. Decreases in inspection intervals may also be advisable if stations are located in an area in or under a structure in which the average daily mean air temperature is expected to remain above 50°F and termites are actively consuming bait in the stations. Inspection intervals must comply with state regulations, where applicable.

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# SUPPLEMENTAL TREATMENT

This product can be applied or used as a supplemental treatment in, underneath, and/or around structures or buildings to kill termites in support of, or as a supplement to, a termiticide product labeled for and applied as a stand-alone termiticide treatment. This includes preand post-construction soil termiticide treatments labeled for providing structural protection. This product may also be used in combination with an additional termiticide treatment, as a supplemental treatment in areas not associated with structures or buildings, such as around trees, wood piles, landscaping elements, railroad track beds, and other areas where termite activity is known or suspected.

To provide a supplemental bait treatment, install one or more bait station(s), in the soil at or near points of known or suspected termite activity. Baiting may be discontinued at any time at the discretion of the applicator. If continued effectiveness of the supplemental treatment is desired, stations should be inspected every120 days.

# **NON-STRUCTURE SPOT TREATMENT**

This product can also be applied or used as a spot treatment in areas not associated with structures or buildings, such as around trees, wood piles, landscaping elements, railroad track beds and other areas where termite activity is known or suspected. Such treatments may be made alone or in combination with an additional termiticide treatment. Spot treatments made with this product are not intended to, and should not be used, as a sole means for providing structural or non-structural protection.

Installation, baiting and monitoring of spot bait treatments made with this product should follow directions provided in the "SUPPLEMENTAL TREATMENT" section above.

# ABOVE GROUND DIRECTIONS FOR USE

This product can be placed on the interior and/or exterior surfaces of homes or other residences, buildings, attics, floor joists, rafters, crawl spaces, decks, utility poles, trees, fences, or other items or areas where subterranean termites appear or there is evidence of subterranean termite activity as a spot treatment or as a supplement to a stand-alone termiticide treatment. Bait is best placed where subterranean termite activity is known to exist or was recently active. TRELONA is designed to be used within the ADVANCE Above Ground Station (ADVANCE AGS) [Alternate brand name]. Use of this product in any other station or system not approved by Whitmire Micro-Gen/BASF is prohibited.

# PRODUCT INFORMATION

This product is designed to kill the subterranean termites that feed upon it and other termites to which the bait is shared or transferred. TRELONA contains the growth regulator, novaluron, which prevents successful molting and the development of subterranean termites. With sufficient and continued termite feeding TRELONA bait, when placed inside an ADVANCE Above Ground Station (ADVANCE AGS) [Alternate brand name], will suppress and may eliminate satellite termite nests and colonies. Above ground use, by itself, is not a complete or stand- alone structural termite treatment. To ensure structural protection, TRELONA in an ADVANCE AGS must be used in conjunction with an in-ground baiting system or soil applied termiticide barrier, which is the complete termite treatment. [Alternate text: "..., is not a complete or stand-alone termite treatment. To ensure structural protection, TRELONA in an ADVANCE AGS must be used in conjunction with an in-ground application of Termidor® SC, Termidor® HE, or other Whitmire Micro-Gen/BASF approved stand-alone termiticide treatment."]

# **INSTALLATION OF BAIT**

- 1. Inspect the site where subterranean termites are currently active or evidence of activity has been identified to determine where to mount the station. Stations should be securely mounted to the target surface using screws (e.g., 3/8" wood screws with a minimum 1/4" diameter head), nails, adhesives, or similar materials. Use caution when attaching station with adhesives or using caulk. Some of these materials may contain volatile compounds which can repel termites. The station housing base contains multiple termite entry/exit points and is to be mounted on a surface so that it abuts and runs substantially parallel to the target surface. Make sure that the target surface has enough strength to support the station.
- 2. Determine where and how the station housing is to be mounted. The station housing can be mounted in any direction as long as the base of the station housing abuts the target surface. If the station housing is being mounted over a shelter tube, move to step 3. When no shelter tube is present, move to step 4.
- 3. Shelter tubes present: Create an opening in the shelter tube ensuring that the opening does not exceed the dimensions of the installed station housing. While holding the station housing in place, position the open top of the station housing facing away from the target surface. Next determine which portals (knock-outs) along the perimeter of the station housing will need to be removed to allow termite access into the station. Remove the station housing from the target surface and, with a screw driver or other suitable tool, knock out or remove the necessary plastic pieces. Place the station housing back into position with the open portals aligned with the termite shelter tube(s) and secure in place. Continue on to step 5.
- 4. **No shelter tubes present:** When termite activity or evidence of activity has been identified but no shelter tubes are present (i.e. termites appearing through small holes or openings in drywall or other materials), the station can be placed on the target surface such

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that 1 or more openings in the station housing base are aligned with the openings on the target surface. If suitable openings are not found, or to create additional openings, a drill equipped with a 3/8" bit may be used to gain access to the termite gallery. Limit disturbing the termites as much as possible while drilling. Place the station housing into position with the proper alignment and secure in place. Continue on to step 5.

5. To install the bait, insert the pre-loaded inner bait tray into the station housing. To do this, first remove the bait tray from its sealed plastic bag. Second, remove the inner bait tray lid (cover) from the inner bait tray and set it aside. Finally, place the inner bait tray inside the station housing such that the bait is positioned next to the base of the station housing and secure in place by closing the station lid. When installed correctly, the printed text, 'THIS SIDE OUT", on the inner bait tray should be clearly visible when the station lid is opened. To prevent tampering, unwarranted or accidental access to the cartridge, secure the lid of the station housing. A plastic zip-tie strap can be used to secure the lid to the station housing.

### INSPECTING THE BAIT

The ADVANCE Above Ground Station (ADVANCE AGS) [Alternate brand name] holds 124g of TRELONA bait, enough to eliminate most termite infestations. Inspect stations as specified in the **Scheduling of Inspections**, **ADJUSTMENTS TO INSPECTION SCHEDULING** and/or **NON-STRUCTURE SPOT TREATMENT** sections of this label as appropriate. More frequent inspections are permitted but not required. When inspecting the station, open the lid and look for termite activity. Determine how much of the bait has been eaten. If >1/2 of the bait has been eaten, replace with a new inner bait tray according to the directions above. Close and secure the station lid.

If no termite activity is detected within the AG station, or if  $\geq 1/3$  of the bait still remains, reinsert the bait container or insert a new bait container into the station housing, close the lid of the station housing and secure. If at the next inspection there is no termite activity, remove any remaining bait.

# STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container in a dry storage area out of reach of children and animals.

**PESTICIDE DISPOSAL:** Product not disposed of by use according to label directions should be wrapped in paper and placed in a trash can.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place container in trash.

#### CONDITIONS OF SALE AND WARRANTY

Follow the **Directions for Use**. It is impossible to eliminate all risks inherently associated with use of this product, and therefore all such risk shall be assumed by the Buyer. Whitmire warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions for Use**, subject to the inherent risks, referred to above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW: (A) WHITMIRE MAKES NO OTHER WARRANTIES EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY, (B) BUYER'S EXCLUSIVE REMEDY AND WHITMIRE'S AND SELLER'S EXCLUSIVE LIABILITY, WHETHER IN CONTRACT, TORT, NEGLIGENCE, STRICT LIABILITY, OR OTHERWISE, SHALL BE LIMITED TO REPAYMENT OF THE PURCHASE PRICE OF THE PRODUCT, AND (C) WHITMIRE AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, INCIDENTAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. Whitmire and the Seller offer this product, and the Buyer accepts it, subject to these **Conditions of Sale and Warranty** which may be varied only by agreement in writing signed by a duly authorized representative of Whitmire.

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