UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 29, 2017

Ms. Kerry Dawson Sosa Product Registration Specialist BASF Corporation, Agricultural Products P.O. Box 13528, 26 Davis Drive Research Triangle Park, NC 27709

Subject: PRIA Label Amendment – Addition of Annual Inspection Interval & Approval of New Alternate Brand Name "TRELONA® ATBS Annual Bait Stations" Product Name: TC 283 EPA Registration Number: 499-557 Application Date: December 12, 2016 Decision Number: 524532

Dear Ms. Sosa:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. The alternate brand name "TRELONA® ATBS Annual Bait Stations" has been added to the product record. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then 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.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Mr. Carmen J. Rodia, Jr. by phone at (703) 306-0327, or via email at <u>Rodia.Carmen@epa.gov</u>.

Sincerely,

Cal

Richard Gebken Product Manager 10 Invertebrate & Vertebrate Branch 2 Registration Division (7505P) Office of Pesticide Programs

Enclosures: Stamped "Accepted" Master & Supplemental Labels, dated June 29, 2017 Efficacy Review, dated June 16, 2017

Alternate Brand Names:

TRELONA® Compressed Termite Bait {submitted via notification 04/16/2012} TRELONA® ATBS Direct Bait Kit {submitted via notification 11/10/2014} TRELONA® ATBS Home Monitoring Kit {submitted via notification 11/10/2014} TRELONA® ATBS Direct Bait Stations {submitted via notification 12/11/2014} TRELONA® ATBS Annual Inspection Stations TRELONA® ATBS Annual Bait Stations **A C C E P T E D** 06/29/2017

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 499-557

NOT FOR INDIVIDUAL RESALE.

- Termite Bait Cartridge (TBC)
- 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 with questions you may have.
- 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:	9.50%
TOTAL:	0.00%
Contains 0.5 grams of novaluron per 100 grams of formulation	
U.S. Patent No. 8,720,108	

EPA Reg. No. 499-557

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN CAUTION/PRECAUCION

Refer to full label for **First Aid**, **Precautionary Statements**, **Directions For Use**, **Conditions of Sale and Warranty**, and state-specific use site restrictions.

NET WEIGHT:

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Alternate Brand Names:

TRELONA® Compressed Termite Bait {submitted via notification 04/16/2012} TRELONA® ATBS Direct Bait Kit {submitted via notification 11/10/2014} TRELONA® ATBS Home Monitoring Kit {submitted via notification 11/10/2014} TRELONA® ATBS Direct Bait Stations {submitted via notification 12/11/2014} TRELONA® ATBS Annual Inspection Stations TRELONA® ATBS Annual Bait Stations



Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 499-557

- 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 with questions you may have.
- 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).50%
OTHER INGREDIENTS:).50%
TOTAL:).00%
Contains 0.5 grams of novaluron per 100 grams of formulation	
U.S. Patent No. 8,720,108	

EPA Reg. No. 499-557

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN CAUTION/PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Refer to full label for First Aid, Precautionary Statements, Directions For Use, Conditions of Sale and Warranty, and state-specific use site restrictions. In case of an emergency endangering life or property involving this product, call day or night 1-800-832-HELP (4357).

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	FIRST AID	
If in eyes	 Hold eyes 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. Call a poison control center or doctor for treatment advice. 	
HOTLINE NUMBER		

Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product, including health concerns, medical emergencies, or pesticide incidents, you may call 1-800-832-HELP (4357), 24 hours per day, 7 days per week.

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands 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.

Directions For Use

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

Read the **Use Directions** carefully before using this product. This product is part of a termite baiting system and is intended for use in BASF approved bait stations which may be purchased from most professional pest control product distributors. Use of this bait in any other type of station or system not approved by BASF is prohibited. Call 1-800-777-8570 for assistance in using this product or any other components of the termite baiting system.

When inspected and replenished per label **Use Directions**, this product provides on-going structural protection through colony elimination; however, conditions or circumstances beyond the control of the user (competing insects, flooding events, cold weather, presence of alternative food sources, etc.) may alter the time needed to achieve structural protection.

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

Pesticide Storage

Store in a cool, dry (preferably locked) area, in a place that is inaccessible to 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. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling

Nonrefillable container. DO NOT reuse or refill this container. Offer for recycling if available. If recycling is not available, place container in trash.

In Case of Emergency

In case of large-scale spill of this product, call:

- CHEMTREC 1-800-424-9300
- BASF Corporation 1-800-832-HELP (4357)
- In case of medical emergency regarding this product, call:
- Your local doctor for immediate treatment
- Your local poison control center (hospital)
- BASF Corporation 1-800-832-HELP (4357)

Station Installation

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

To install a station, excavate a hole in the ground approximately the same size and dimensions as those of the station. Insert the station and maximize contact between the exterior of the station and the soil. This 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 concrete, asphalt, etc.), insert station below the surface (in contact with the ground) and seal securely.

Install stations within approximately 5 feet of points of known, probable, or suspected termite foraging activity and in other areas that provide conditions conducive to termite activity. Such areas may include concentrations of cellulose-containing debris in contact with the ground, such as mulch, wood scraps, areas of moderate soil moisture, shaded areas, areas containing plant root systems, bath traps, visible termite foraging tubes, or other evidence of termite activity or conducive conditions. Relocate or 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. 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 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; however, either the interior or the exterior of the crawl space must contain a complete set of stations, as defined by this label. Stations can be installed within a slab structure in 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.

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 install 1 or more supplemental stations in the immediate vicinity (up to 5 feet) of the infested station(s) in order that bait consumption by the colony be maximized.

Use Directions

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 new structures (as a substitute for, and in lieu of, preconstruction soil treatment). [In *{insert 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 established (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.

Pre-baiting

Pre-baiting is a process by which termite activity is established at a location prior to the application of bait at that location. Use BASF approved pre-bait to establish activity in the station. Inspect pre-baited stations every 120 days. Inspections cannot take place more than 30 days beyond the required interval unless cold temperatures persist (average daily mean exterior air temperature below 50°F). Termite feeding activity is typically reduced under low temperature conditions making it difficult to accurately assess termite activity. The operator should always make allowances for local circumstances when considering increasing elapsed time between inspections. If there is termite activity in a pre-baited station, make bait continuously available for colony consumption by removing the pre-bait and placing this product in the station. Refer to Table 1. Baiting Inspection Intervals by Cartridge Size for details.

Direct Baiting

This product can be placed in stations at any time prior to termite activity (direct baiting), with or without the presence of termites. Refer to **Table 1. Baiting Inspection Intervals by Cartridge Size** for details.

Inspection Interval	Cartridges Required
[90 Days*]	[One 93 gram cartridge]
120 Days*	One 124 gram cartridge
Annual	Every bait station must contain: One 93 gram cartridge + One 124 gram cartridge OR Two 124 gram cartridges (preferred)

Inspection intervals must comply with state regulations where applicable.

Shorter inspection intervals may be warranted if termite activity indicates complete consumption of the bait in a station before the scheduled inspection.

Inspections cannot take place more than 30 days beyond the required interval unless cold temperatures persist (average daily mean exterior air temperature below 50°F). Termite feeding activity is typically reduced under low temperature conditions making it difficult to accurately assess termite activity. The operator should always make allowances for local circumstances when considering increasing elapsed time between inspections.

- **DO NOT** allow more than 6 months to pass between inspections for the [90 or 120] day inspection interval[s].
- **DO NOT** allow more than 15 months to pass between inspections for the annual inspection interval.

* After feeding has stopped, and there has been no activity for one year, inspect the stations every 6 months.

Inspecting Stations and Replacing Bait

To inspect a station, remove the cover and visually examine the cartridges for the presence of termites, being careful to minimize disturbance in the case that termites are present. If it appears that >1/3 of a bait cartridge in the station has been consumed, replace that cartridge with a new cartridge. If termites are not present, inspect bait for excessive decay. Replace excessively decayed bait and securely close the station cover.

Transitioning from [90 Day or 120 Day] to Annual Inspection Interval in Baited Stations

Alternatively, baited stations on a [90 day or 120 day] inspection interval may be switched to an annual inspection interval if all contents are removed from the stations and replaced with two **Trelona® Compressed Termite Bait** cartridges. All stations around the structure must contain two **Trelona Compressed Termite Bait** cartridges or the inspection period cannot exceed [90 days or 120 days] [depending on the cartridge size]. Inspection of bait treatments made with this product must be done according to the inspection intervals listed in **Table 1. Baiting Inspection Intervals by Cartridge Size**.

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, at the edge of property lines and other areas where termite activity is known or suspected. Such treatments may be made alone or in combination with an additional method of termiticide treatment. To provide a non-structure spot treatment, install one or more bait station(s) in the soil at or near points of known or suspected termite activity. Non-structure spot treatment baiting may be discontinued at any time at the discretion of the applicator. Inspection of bait treatments made with this product must be done according to the inspection intervals listed in **Table 1. Baiting Inspection Intervals by Cartridge Size**.

Supplemental Treatments

If a soil-applied liquid or granular termiticide treatment is performed in conjunction with installation of the bait system, **DO NOT** treat the area where stations are installed (preferably not within 2 feet of stations). Because the use of bait may be a multi-step process, localized treatment using soil applied termiticide to the structure infested with active termites at the time of baiting may provide more immediate control of termites in those parts of the structure. Preventative spot treatments to critical areas of soil or wood may be performed in conjunction with station installation. **DO NOT** treat directly on top of installed stations with a repellent insecticide during routine general pest or perimeter applications.

This product can be applied or used as a supplemental treatment in, underneath, and around structures or buildings to kill termites in support of or as a supplement to a termiticide product labeled for and applied as a standalone termiticide treatment. This includes pre- and 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. Inspection of bait treatments made with this product must be done according to the inspection intervals listed in Table 1. Baiting Inspection Intervals by Cartridge Size.

Conditions of Sale and Warranty

The **Directions For Use** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as environmental conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of BASF CORPORATION ("BASF") or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. BASF 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) **BASF MAKES NO OTHER WARRANTIES EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF** FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY, (B) BUYER'S EXCLUSIVE **REMEDY AND BASF'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) BASF AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, INCIDENTAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. BASF and the Seller offer this product, and the Buyer and User accept 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 BASF. PCS915

Trelona is a registered trademark of BASF.

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000499-00557.20161114e.**NVA 2016-04-466-0186** Supersedes: NVA 2015-04-466-0181 Supplemental: NVA 2016-04-466-0255

> BASF Corporation 26 Davis Drive Research Triangle Park, NC 27709



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Supplemental Label

Alternate Brand Names:

TRELONA® Compressed Termite Bait {submitted via notification 04/16/2012} TRELONA® ATBS Direct Bait Kit {submitted via notification 11/10/2014} TRELONA® ATBS Home Monitoring Kit {submitted via notification 11/10/2014} TRELONA® ATBS Direct Bait Stations {submitted via notification 12/11/2014} TRELONA® ATBS Annual Inspection Stations TRELONA® ATBS Annual Bait Stations

Annual Inspection Interval for [TC 283/Alternate Brand Name]

This supplemental label expires June 29, 2020, and must not be used or distributed after this date.

ACTIVE INGREDIENT:

Novaluron: 1-[3-chloro-4-(1,1,2-trifluoro-2-trifluoro-methoxyethoxy)	
phenyl]-3-(2,6-difluorobenzoyl) urea	0.50%
OTHER INGREDIENTS:	99.50%
Total:	

EPA Reg. No. 499-557 CAUTION/PRECAUCION

Directions For Use

- It is a violation of federal law to use this product in a manner inconsistent with its labeling.
- The supplemental labeling and the entire [TC 283/Alternate Brand Name] container label, EPA Reg. No. 499-557, must be in possession of the user at the time of application.
- · Read the label affixed to the container for this product before applying.
- Use of [TC 283/Alternate Brand Name] according to this labeling is subject to the use precautions and limitations imposed by the label affixed to the container for this product.
- Refer to this product's container label for additional application instructions and restrictions.

Use Directions

This product can now be inspected annually provided stations are baited according to the specifications in this supplemental label.

An annual inspection interval requires that every bait station around the structure contain either:

- One 93 gram cartridge + One 124 gram cartridge; or
- Two 124 gram cartridges (preferred)

Stations on a 120 day inspection interval may be switched to an annual inspection interval only if every bait station around the structure contains two Trelona[®] Compressed Termite Bait cartridges.

Inspection intervals must comply with state regulations where applicable.

Shorter inspection intervals may be warranted if termite activity indicates complete consumption of the bait in a station before the scheduled inspection.



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ACCEPTED

06/29/2017

Under the Federal Insecticide, Fungicide

and Rodenticide Act as amended, for the

499-557

pesticide registered under

EPA Reg. No.

Inspections cannot take place more than 30 days beyond the required interval unless cold temperatures persist (average daily mean exterior air temperature below 50°F). Termite feeding activity is typically reduced under low temperature conditions making it difficult to accurately assess termite activity. The operator should always make allowances for local circumstances when considering increasing elapsed time between inspections. **DO NOT** allow more than 15 months to pass between inspections.

Conditions of Sale and Warranty

The **Directions For Use** of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as environmental conditions, presence of other materials, or use of the product in a manner inconsistent with its labeling, all of which are beyond the control of BASF CORPORATION ("BASF") or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. BASF 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) BASF MAKES NO OTHER WARRANTIES EXPRESS OR IMPLIED. INCLUDING WARRANTIES OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY, (B) BUYER'S EXCLUSIVE REMEDY AND BASF'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) BASF AND THE SELLER **DISCLAIM ANY LIABILITY FOR** CONSEQUENTIAL, INCIDENTAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE **USE OR HANDLING OF THIS PRODUCT.** BASF and the Seller offer this product, and the Buyer and User accept 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 BASF. PCS915

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