

8329-80

05-08-2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Karen J. Larson
Product Registration
Clarke Mosquito Control Products, Inc.
159 N. Garden Ave.
Roselle, Ill 60172

MAY 8 2009

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request General Label Change, Marketing Claims and Revised Confidential
Statement of Formula
EPA Reg. No. 8329-80
Application Dated March 27, 2009

Dear Ms. Larson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 03/27/09 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) dated 03/27/09 label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

(A)

EPA

United States Environmental Protection Agency
Office of Pesticide Programs (H7505C)
Washington, DC 20460

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide:

Section I

1. Company/Product Number: 8329-80
2. EPA Product Manager: K. Nesci
3. Proposed Classification: None Restricted
4. Company/Product (Name): Natular™ G
5. Name and Address of Applicant: Clarke Mosquito Control Products, Inc., 159 N. Garden Avenue, Roselle, Illinois 60172
6. Expedited Review: NOTIFICATION MAY 08 2009

Section II

Amendment - Explain below
 Resubmission in response to Agency letter dated _____
 Notification - Explain below.
 Final printed labels in response to Agency letter dated _____
 "Me Too" Application.
 Other - explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
Notification of addition of optional label marketing claims describing approved uses and submission of updated Confidential Statement of Formula as described in the enclosed cover letter. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material This Product Will Be Packaged In:
Child-Resistant Packaging: No
Unit Packaging: No
Water Soluble Packaging: No
2. Type of Container: Paper
3. Location of Net Contents Information: Label
4. Size(s) of Retail Container: 40-lb, 50-lb
5. Location of Label Directions: On Label
6. Manner In Which Label is Affixed to Product: Paper glued

Section IV

1. Contact Point: Name: Karen J. Larson, M.S., Title: Registrations Manager, Telephone No.: 630-671-3123
Certification: I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
2. Signature: [Handwritten Signature]
3. Title: Registrations Manager
4. Typed Name: Karen J. Larson
5. Date: March 27, 2009
6. Date Application Received (Stamped):

Mosquito Control

PH: 630-894-2000
FAX: 630-894-1774

March 27, 2009

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

SERVICE

PRODUCTS

EQUIPMENT

EDUCATION

Subject: Notification per PR Notice 98-10; optional label marketing claims and submission of updated Confidential Statement of Formula

Product: Natular™ G
EPA Reg. No. 8329-80

Enclosed is notification per the guidance and requirements of Pesticide Registration Notice 98-10 for the registered product listed above. Clarke Mosquito Control Products, Inc. is notifying the agency of optional marketing claims on its product label describing approved uses.

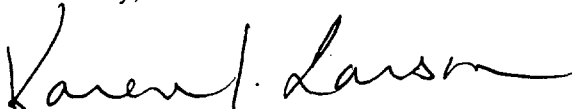
Clarke is also submitting an updated Confidential Statement of Formula which simply updates the administrative sections of the current form on file with the Agency (dated Mar. 10, 2005) as follows:

- Updates the brand name to reference the primary brand name approved in the Agency letter dated Dec. 30, 2008;
- Reflects the current registrant and EPA registration number (assigned by transfer of the registration to Clarke on October 22, 2008);
- Updates the name and address of the Producer;
- Identifies a change in source of an approved inert ingredient; and
- Updates the EPA Product Manager assignment

No other changes have been made to the formulation of this product.

Thank you, in advance, for your prompt review of our submission. Please do not hesitate to call me directly at (630) 671-3123 or email me at karenlarson@clarkemosquito.com if you should have any questions.

Sincerely,



Karen J. Larson, M.S.
Registrations Manager
Clarke Mosquito Control Products, Inc.



Global
Solutions for
Mosquito
Control™



4/5

Natular™ G

Mosquito Larvicide / Granule

[An insecticide for the control of mosquito larvae]

To be used in governmental mosquito control programs, by professional pest control operators, or in other mosquito or midge control operations.

Active Ingredient:
Spinosad (a mixture of spinosyn A and spinosyn D)*

Other ingredients
Total

NOTIFICATION
MAY 08 2009
100.0%

U.S. Patent No. 5,362,634 and 5,496,931
* Naturalyte® Insect Control

[This product contains 0.2 lb of the active ingredient spinosad per 40 lb bag]
[This product contains 0.25 lb of the active ingredient spinosad per 50 lb bag]
[This product contains 0.125 lb of the active ingredient spinosad per 25 lb container]

General Use Precautions

Integrated Pest Management (IPM) Programs

NATULAR G is intended to kill mosquito and midge larvae. Mosquitoes are best controlled when an IPM program is followed. Larval control efforts should be managed through habitat mapping, active adult and larval surveillance, and integrated with other control strategies such as source reduction, public education programs, harborage or barrier adult mosquito control applications, and targeted adulticide applications.

Insecticide Resistance Management (IRM)

NATULAR G contains a Group 5 insecticide. Insect biotypes with resistance to Group 5 insecticides may eventually dominate the insect population if appropriate resistance management strategies are not followed. Currently, only spinetoram and spinosad active ingredients are classified as Group 5 insecticides. Resistance to other insecticide groups is not likely to impact the effectiveness of this product. Spinosad may be used in rotation with all other labeled products in a comprehensive IRM program.

To minimize the potential for resistance development, the following practices are recommended:

- Base insecticide use on comprehensive IPM and IRM programs.
- Do not use less than the labeled rates.
- Routinely evaluate applications for loss of effectiveness.
- Rotate with other labeled effective mosquito larvicides that have a different mode of action.
- In dormant rice fields, standing water within agricultural/crop sites, and permanent marine and freshwater sites, do not make more than 20 applications per year.
- Use insecticides with a different mode of action (different insecticide group) on adult mosquitoes so that both larvae and adults are not exposed to products with the same mode of action.
- Contact your local extension specialist, technical advisor, and/or Clarke Mosquito Control representative for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.
- For further information or to report suspected resistance, you may contact your local Clarke Mosquito Control representative by calling 800-323-5727.

Spray Drift Management

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determines the potential for spray drift. The applicator is responsible for considering all these factors when making decisions. Where states have more stringent regulations, they should be observed.

Application

Proper application techniques help ensure adequate coverage and correct dosage necessary to obtain optimum kill of mosquito and midge larvae. The following recommendations are provided for ground and aerial application of NATULAR G.

Ground Application

Use conventional ground application equipment and apply NATULAR G at the designated rate for the targeted site.

Spot Treatment

Apply NATULAR G as a spot treatment to areas where mosquitoes are breeding at rates appropriate for the treatment site habitat and conditions.

Aerial Application

Equipment used in the application of NATULAR G should be carefully calibrated before use and checked frequently during application to be sure it is working properly and delivering a uniform

Group

5

INSECTICIDE

**Keep Out of Reach of Children
CAUTION**

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This product is toxic to aquatic invertebrates. Non-target aquatic invertebrates may be killed in water where this pesticide is used. Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Do not apply when weather conditions favor drift from treated areas. Drift from treated areas may be hazardous to aquatic organisms in neighboring areas. Apply this product only as specified on the label.

Directions for Use

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

Read all Directions for Use carefully before applying.

General Information

NATULAR G is a Naturalyte® insect product for killing mosquito and midge larvae. This product's active ingredient, spinosad, is biologically derived from the fermentation of *Saccharopolyspora spinosa*, a naturally occurring soil organism. NATULAR G may be applied with suitable ground or aerial application equipment.

distribution pattern. Avoid overlaps that will increase NATULAR G dosage above recommended limits.

Application Sites and Rates

The rates listed are typical for efficaciously killing mosquito and midge larvae in the listed habitat sites. NATULAR G may be applied at rates up to 20 lb per acre in waters high in organic content (such as polluted water, sewage lagoons, animal waste lagoons, and waters with high concentrations of leaf litter or other organic debris), deep-water mosquito habitats or those with dense surface cover, and where monitoring indicates a lack of kill at typical rates. Do not re-apply within 7 days of the initial application unless monitoring indicates that larval populations have reestablished or weather conditions have rendered initial treatments ineffective. Do not apply to water intended for irrigation.

For killing mosquito larvae species in the following non-crop sites:

| Non-Crop Site | NATULAR G lb/acre (lb ai/acre) |
|---|--------------------------------------|
| Temporary Standing Water Woodland pools, snow pools, roadside ditches, retention ponds, freshwater dredge spoils, tire tracks and other natural or manmade depressions, rock holes, pot holes and similar areas subject to holding water Other Freshwater Sites Natural and manmade aquatic sites, edges of lakes, ponds, canals, stream eddies, creek edges, detention ponds | 3.5 – 6.5 (0.018 – 0.033) |
| Freshwater Swamps and Marshes Mixed hardwood swamps, cattail marsh, common reed wetland, water hyacinth ponds, and similar freshwater areas with emergent vegetation Marine/Coastal Areas Intertidal areas above the mean high water mark, mangroves, brackish water swamps and marshes, coastal impoundments and similar areas | 9 (0.045) |
| Stormwater/Drainage Systems Storm sewers, catch basins, drainage ditches, and similar areas Wastewater Sewage effluent, sewers, sewage lagoons, cesspools, oxidation ponds, septic ditches and tanks, animal waste lagoons and settling ponds, livestock runoff lagoons, wastewater impoundments associated with fruit and vegetable processing, and similar areas | 6.5 – 9 (0.033 – 0.045) |
| Dormant Rice Fields Impounded water in dormant rice fields (for application only during the interval between harvest and preparation of the field for the next cropping cycle) | 3.5 – 6.5 (0.0180 – 0.033) |
| Natural and Artificial Containers Tree holes, bromeliads, leaf axils, and other similar natural water holding containers Cemetery urns, bird baths, flower pots, rain barrels, buckets, single tires, tires stockpiled in dumps, landfills, recycling plants and other similar areas, abandoned swimming pools, ornamental ponds, flooded roof tops and similar water holding sites. Landfill containers, salvage yards, abandoned vehicles | 3.5 – 9 (0.018 – 0.045) |

For killing mosquito larvae species in standing water within agricultural/crop sites where mosquito breeding occurs:

| Agricultural/Crop Site | NATULAR G lb/acre (lb ai/acre) |
|---|--------------------------------------|
| Pastures/hay fields, rangeland, orchards, citrus groves | 3.5 – 9 (0.018 – 0.045) |

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site according to label use directions or at an approved waste disposal facility.

Container Disposal: Completely empty bag into application equipment. Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

{Optional Market Label}

FOR ORGANIC PRODUCTION

Terms and Conditions of Use

Clarke Mosquito Control Products, Inc. acknowledges that this product may be misbranded if one or more of its ingredients, active and/or inert, is reclassified as non-organic and/or removed from the United States Department of Agriculture (USDA) National List of approved substances for use in organic production and handling. If one or more of the ingredients in this pesticide product are so reclassified and/or removed (delisted) from the National List, Clarke Mosquito Control Products, Inc. will take appropriate remedial measures with respect to the labeling for this product.

Warranty

To the extent consistent with applicable law CLARKE MOSQUITO CONTROL PRODUCTS, INC. makes no warranty, express or implied, concerning the use of this product other than as indicated on the label. Buyer assumes all risk of use/handling of this material when use and/or handling is contrary to label instructions.

NOTIFICATION

MAY 08 2009

Manufactured by
Clarke Mosquito Control Products, Inc.
159 North Garden Avenue
Roselle, IL 60172

EPA Reg. No. 8329-80
EPA Est.:

Lot: _____

Net Weight _____

Naturalyte® is a Trademark of Dow AgroSciences LLC
Natarlar™ is a Trademark of Clarke Mosquito Control Products, Inc.