

8329-85

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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

FEB 21 2009

SUBJECT: Application for Pesticide Notification (PRN 98-10)  
Request Primary Brand Name "Natular T30," Warranty Statement, Advisory  
Labeling Changes and Revised Statement of Formula  
EPA Reg. No. 8329-85  
Application Dated October 23, 2008

Dear Ms. Larson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 10/23/08 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) 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 be "Linda Arrington".

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

<b>(A)</b>	<b>EPA</b> United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460	<input type="checkbox"/> <b>Registration</b>	<b>OPP Identifier Number</b>
		<input type="checkbox"/> <b>Amendment</b>	
		<input checked="" type="checkbox"/> <b>Other</b>	

**Application for Pesticide:**

**Section I**

1. Company/Product Number <b>8329-85</b>	2. EPA Product Manager <b>K. Nesci</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Natular T30 (formerly GF-1934)</b>	PM# <b>13</b>	
5. Name and Address of Applicant (Include ZIP Code)  Clarke Mosquito Control Products, Inc. 159 N. Garden Avenue Roselle, Illinois 60172  <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> In accordance with FIFRT Section 3(c)(3) (b)(I), my product is similar or identical in composition to:  <div style="text-align:right"><b>NOTIFICATION</b> <b>FEB 21 2009</b></div> EPA Reg. No. _____ Product Name _____

**Section II**

<input type="checkbox"/> Amendment - Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - explain below.
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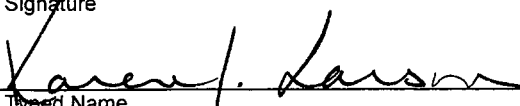
**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

**Notification of change in Primary Brand Name, revised Warranty statement, and other advisory labeling. Also, Notification of alternate source of inert ingredient. 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:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No.	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>foil-lined bag</u>	
*Certification must be submitted.		If "Yes," Unit Package wgt.	No. per container	If "Yes," Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container 50-400 count case		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other (____)					

**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name <b>Karen J. Larson, M.S.</b>	Title <b>Registrations Manager</b>	Telephone No. (Include Area Code) <b>630-671-3123</b>
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		
2. Signature 	3. Title <b>Registrations Manager</b>	6. Date Application Received (Stamped) <b>FEB 21 2009</b>
4. Typed Name <b>Karen J. Larson</b>	5. Date <b>October 23, 2008</b>	

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# CLARKE™

159 NORTH GARDEN AVENUE  
P.O. Box 72197 / ROSELLE, IL 60172  
www.clarkemosquito.com  
TOLL-FREE: 800-323-5727

**Mosquito Control**

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

October 23, 2008

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

S E R V I C E

P R O D U C T S

E Q U I P M E N T

E D U C A T I O N

Subject: Notification per PR Notice 98-10 - Change in Primary Brand Name

Product: GF-1934  
EPA Reg. No. 8329-85

Enclosed is notification per the guidance and requirements of PR Notice 98-10 for the registered product listed above. The subject product was transferred to Clarke Mosquito Control Products, Inc. on October 22, 2008 from Dow AgroSciences, LLC. Pursuant to the change in ownership, enclosed is notification of a change in Primary Brand Name and other advisory label statements, and a correction to the Confidential Statement of Formula permitted by notification, as follows:

- **Change in Primary Brand Name: Natular T30**
- Revised warranty statement
- Company-specific edits, including emergency contact toll-free phone number and format
- Revision to advisory Insecticide Resistance Management (IRM) label statements that are not considered control claims
- Notification of alternate source of an inert ingredient in the formulation

The subject product is a tableted (solid) product which is not dilutable, and is distributed packed in a non-rigid container. Reference to alternate packaging is removed from the product label.

No other changes have been made to the labeling of the Confidential Statement of Formula for 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.

**Global  
Solutions for  
Mosquito  
Control™**

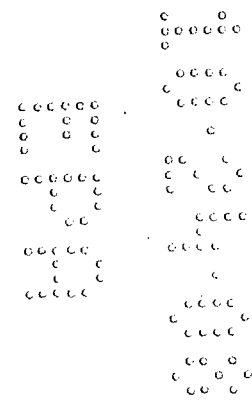


Please do not hesitate to call me directly at (630) 671-3123 or email me at [karenlarson@clarkemosquito.com](mailto:karenlarson@clarkemosquito.com) if you should have any questions about the enclosed.

Sincerely,



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



# Natular T30

An insecticide for the control of mosquito larvae.

For use only by federal, state, tribal or local government officials responsible for public health or vector control or by persons certified in the appropriate category or otherwise authorized by the state or tribal lead pesticide regulatory agency to perform larval mosquito control applications or by persons under their direct supervision.

Group	5	INSECTICIDE
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Active Ingredient:  
spinosad (a mixture of spinosyn A and spinosyn D)\* 8.33%

Other ingredients 91.67%  
Total 100.00%

U.S. Patent No. 5,362,634 and 5,496,931

\* A Naturalyte® Insect Control product

Natular T30 is an 8.33% tablet. This product may absorb moisture; therefore, the weight of the tablet and percent by weight of active ingredient will vary with hydration.

## Keep Out of Reach of Children CAUTION

EPA Reg. No. 8329-85

EPA Est. 8329-IL-02

NOTIFICATION

FEB 21 2009

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

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

Harmful if swallowed. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear (such as goggles, face shield, or safety glasses).

First Aid	
If swallowed:	<ul style="list-style-type: none"><li>• Call a poison control center of doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything to an unconscious person.</li></ul>
If in eyes:	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with warm water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-214-7752 for emergency medical treatment information.	

#### Environmental Hazards

This product is toxic to aquatic organisms. Non-target aquatic invertebrates may be killed in waters where this pesticide is used. Do

not contaminate water when cleaning equipment or disposing of equipment washwaters. Apply this product only as specified on this 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 T30 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 T30 releases effective levels of spinosad for up to 30 days under typical environmental conditions.

Release of spinosad is affected by the dissolution of the Natular T30 tablet. If tablets become covered by obstructions such as debris, vegetation, or loose sediment as a result of high rainfall or flow, normal dispersion of the active ingredient can be inhibited. Water flow may increase the dissolution of the tablet, thus reducing the residual life of the tablet. Inspect areas of water flow to determine appropriate re-treatment intervals. To assure positive results, place Natular T30 tablets where they will not be swept away by flushing action.

### General Use Precautions

#### Integrated Pest Management (IPM) Programs

Natular T30 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 T30 contains a Group 5 insecticide. Insect biotypes with acquired 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 5 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.

### Application

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Proper application techniques help ensure adequate coverage and correct dosage necessary to obtain optimum kill of mosquito and midge larvae. Natular T30 tablets provide up to 30 days of residual kill. Natular T30 can be applied prior to flooding, on snow and ice in breeding sites prior to spring thaw, or at anytime after flooding in listed sites. Continue treating through the last brood of the season. Natular T30 tablets will be unaffected in dry down situations and will begin working again during subsequent wetting events until the tablet is exhausted. Note: Natular T30 has no effect on mosquitoes which have reached the pupal or adult stage prior to treatment.

#### Application Sites and Rates

Natular T30 tablets are designed to kill mosquitoes in small bodies of water. Do not apply to water intended for irrigation. Examples of application sites are:

Storm water drainage areas, sewers and catch basins, woodland pools, snow pools, roadside ditches, retention ponds, freshwater dredge spoils, tire tracks, rock holes, pot holes and similar areas subject to holding water.

Natural and manmade aquatic sites, fish ponds, ornamental ponds and fountains, other artificial water-holding containers, flooded crypts, transformer vaults, abandoned swimming pools, construction and other natural or manmade depressions.

Stream eddies, creek edges, detention ponds.

Freshwater swamps and marshes including mixed hardwood swamps, cattail marsh, common reed wetland, water hyacinth ponds, and similar freshwater areas with emergent vegetation.

Brackish water swamps and marshes, intertidal areas.

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.

Also for use in dormant rice fields (for application only during the interval between harvest and preparation of the field for the next cropping cycle) and in standing water within pastures/hay fields, rangeland, orchards, and citrus groves where mosquito breeding occurs. Do not apply to waters intended for irrigation.

For mosquito kill in non- or low-flow, shallow depressions (up to 2 feet in depth), treat on the basis of surface area placing 1 Natular T30 tablet per 100 sq ft.

For applications in storm water drainage areas, sewers and catch basins, place Natular T30 tablet into each catch basin.

For application sites connected by a water system, i.e., storm drains or catch basins, treat all of the water holding sites in the system to maximize the efficiency of the treatment program.

For application to small contained sites which may not be amenable to a rate of a single tablet per 100 sq ft, use 1 tablet per contained site (e.g., cesspools and septic tanks, transformer vaults, abandoned pools, and other small artificial water-holding containers).

#### STORAGE AND DISPOSAL

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

**Pesticide Storage:** Store in a cool dry place in original container only.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

## NOTIFICATION

FEB 21 2009

#### 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.

Lot: \_\_\_\_\_

Net Weight: \_\_\_\_\_

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