

9688-209

10-25-2004

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0080. Approval expires 11-30-93



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

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Section I

1. Company/Product Number 9688-209	2. Product Manager G. LaRocca	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Chemsico Insect Bait REP	PM# 13	
5. Name and Address of Applicant (include ZIP Code) Chemsico, Division of United Industries Corporation PO Box 142642 St. Louis, Missouri 63114-0642 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section II

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed label in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "ME TOO" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - explain below

NOTIFICATION
OCT 25 2004

Explanation: Use additional page(s) if necessary. (For section I and Section II)
Notification per PR Notice 98-10 to remove the text as requested by the Agency, "Now can kill twice as many termites as Chemsico Insect Bait A."
Also, as to not conflict with the EPA signal word, we are changing the term "Warning" to "Notice" as requested by the Agency.

Section III

1. Material in Which This Product Will Be Packaged:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes * <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water-Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			
* 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 type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label Is Affixed To Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section IV

1. Contact Point (Complete items directly below for identification of the individual to be contacted, if necessary, to process this application)		
Name Jennifer D. Morton	Title Regulatory Affairs Specialist	Telephone No. (include Area Code) 1-800-242-1166 Ext 2737
Certification 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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Affairs Specialist	
4. Typed Name Jennifer D. Morton	5. Date October 5, 2004	

Front Panel

CHEMSICO INSECT BAIT REP

[Kills [Subterranean] Termites • Targets [Subterranean] Termites • Do-it-yourself termite killing system for [against] subterranean termites • Termite killing stakes • Use for killing subterranean termites • Child resistant [termite] stake(s) • Information booklet and [how-to] video included • Complete Directions for Use and [how-to] video included • Includes [Contains] auger • Locator Shields [Included] [make stakes easy to find] • Easy to Find Locator Shields • Locator Shields – make it easy to find & inspect stakes • [New] Improved Longer Stake • Deeply Penetrates Soil • [New] Longer Stake • [New], Deep Soil Penetration • [New] Stake Reaches Deep Into the Soil • [New] Longer Stake • [New] Larger Stake with More Killing Material [Bait] than Chemsico Insect Bait A • Now with twice the Killing Bait [Material] as Chemsico Insect Bait A • Twice as Much Killing Bait [Material] as Chemsico Insect Bait A • [New] Larger Stake with Twice the Killing Material [Bait] [Ingredient] as Chemsico Insect Bait A • [New] Stake Goes Deep Into the Soil Where Termites Forage • Now with Locator Shield...easy to find (locate), easy to inspect • [New] [Improved] Auger [Digging Tool] ... Can Be Used By Hand or With a Cordless Drill • Installs in Minutes • Works in all Soil Types [Varieties] • Satisfaction guaranteed or your money back • Refill [Size] for Chemsico Insect Bait REP • To be used as a refill for the [insert number] count Chemsico Insect Bait REP • Refill count [10, 15, or 20] • Refill contents could include a video, auger • Satisfaction Guaranteed or Your Money Back]

See Directions [For Use] for more information. Not recommended as sole protection against termites and for active infestations, get a professional inspection.

Active Ingredient:
Sulfluramid0.01%
Other Ingredients 99.99%
U.S. Patent No. 4,921,696. Other U.S. and Foreign Patents Pending

Do Not Allow Children or Pets to Play with Stakes

CAUTION See [side] [back] [booklet] for additional precautionary information
Contains 10, 20, 30, 40 – 0.25 oz Child Resistant stakes
Total Net Wt XX oz
[Auger] [How-to-Video] [Informational Video] [Instruction booklet] [Locator shields]
[One digging tool]

OPTIONAL MARKETING LANGUAGE

- [Complete Do-It-Yourself Kit
- Easy-To-Find Locator Shields
 - Child Resistant Stakes
 - Digging Tool Can be Used By Hand Or With A Drill
 - Informational Booklet and Video Included]

[Dig...Install...Kills Termites!]

[If a Chemsico Insect Bait REP stake has been emptied [consumed, eaten, depleted], or if a Spectracide Terminate Termite Detection Stake has been triggered, replace the stake with 1 [New] Chemsico Insect Bait REP stake and 3 additional Chemsico Insect Bait REP stakes around the replaced stake.]

DID YOU KNOW?

- Termites are present virtually everywhere.
- Subterranean termites can be found in the soil up to 12 feet deep.
- Cost of damage caused by termites exceeds \$1.5 billion annually.
- Subterranean worker termites forage up to 250 feet from the colony in search of wood-based food sources.
- Termites work 24 hours a day. Worker termites bring food to the colony through tunnels, without ever resting.
- Once termites are in your home, termites can infest virtually any part of your wood trim, siding, wallboard and even picture frames.

How It Works

[Step] 1: Dig stake holes (auger provided) around your home.

[Step] 2: Foraging termites that find the stakes, take the bait back to the colony.

[Step] 3: Chemsico Insect Bait REP kills termites that eat the bait.

[Step] 4: Inspect the stakes regularly.

Chemsico Insect Bait REP

Conventional professional termite treatments rely on creating a chemical barrier around the home. Chemsico Insect Bait REP utilizes a system of stakes that contain TransFlur®, a slow acting termiticide that kills termites in the soil.

NOTIFICATION

OCT 25 2004

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Back Panel

BOX LABEL

STOP. READ ENTIRE LABEL BEFORE USE.

Complete directions for use and [instructional] [informational] video are enclosed.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For outdoor use around the home.*

1. Gather together:

- Chemsico Insect Bait REP stakes and locator shields
- Tape measure
- Enclosed Graph paper
- Enclosed auger
- Power drill (optional)

Representative graphics

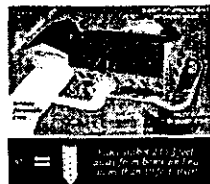
2. Determine the number of stakes you need.

The number of stakes needed is determined by the distance around the outside of your house. To estimate, use the square footage of your home excluding your garage, attached decks, patios and porches. Home designs vary, but if you know the approximate square footage of your home the chart [below] will help you choose the number of stakes you need.

Graphic of table that shows stakes per square foot.

3. **Prepare drawing of your house.** Using the enclosed graph paper, make a drawing of the outside of your house. Note areas on the drawing such as doors, bushes, chimneys, etc. that will help you locate the stakes during the inspection process. Look for areas that are likely to support termite activity and note them on your drawing. These might include areas that retain moisture around downspouts, spigots, air conditioner lines, and low areas with poor drainage.

4. **Install the stakes** around the house. Using the enclosed auger, dig holes 2 to 3 feet away from the foundation and no more than 10 feet apart. Insert the stakes with locator shield in the holes. Place stakes closer together in "termite critical" areas.



Notice: Do not use auger for any purpose other than installation of the termite killing stakes.

5. **Inspect the stakes.** Check the stakes for termite activity by pulling the stakes from the ground. The locator shields will help make removal of the stakes easier. It is important to check the stakes every 3 months. If you live in an area suspected to contain Formosan subterranean termites, the frequency of stake inspection should be increased to once a month.

Graphic of stake and shield

Look for signs that the bait has been eaten or that termites are present inside the stake.

Graphic of stake with bait eaten

Graphic of stake with termites inside

If evidence of termite activity is found in any stake, take the following steps:

- Replace the active stake with a new stake if more than 50% of the bait has been eaten, otherwise place the original stake back in the hole;
- Install additional stakes (3 or more) within one foot of the infested stake; and
- Note the date, the location, and the additional stakes on your drawing.

All stakes must be replaced or removed every 12 months. Be sure to wash your hands thoroughly after completing the inspection. Do not use more than 40 stakes per home [structure].

[FOR USE WITH THE SPECTRACIDE TERMINATE TERMITE DETECTION STAKE: If you have installed Terminate Termite Detection Stakes and the orange indicator has popped, replace the Termite Detection Stake with a Chemsico Insect Bait REP stake. Insert the Chemsico Insect Bait REP stake into the Terminate Termite Detection Stake locator shield and add an additional 3 stakes, with locator shields, around the replaced stake.

Remember to monitor your detection stakes according to the package directions.]

BOOKLET LABEL

*Read All Instructions
inside before using*



Front panel text:

**Chemsico Insect Bait REP
[Do-It-Yourself Termite Killing System Against
Subterranean Termites]**

Chemsico Insect Bait REP termite killing stakes are not recommended as sole protection against termites, and for active infestation, get a professional inspection.

Active Ingredient:
Sulfluramid0.01%
Other Ingredients 99.99%
U.S. Patent No. 4,921,696. Other U.S. and Foreign Patents Pending

Do Not Allow Children or Pets to Play with Stakes

CAUTION See inside for additional precautionary information

See "Reducing the Risk of Termites" and Important Usage Notes" for more information.

WELCOME

Thank you for purchasing Chemsico Insect Bait REP.

Using Chemsico Insect Bait REP is an important step toward reducing the risk of termite damage. This booklet and the how-to-video include complete step-by-step instructions on how to install and inspect your stakes, and information on what to do if you find termite activity. They also include other important steps that you should take to reduce the chance of termite infestation.

Reducing the risk of termites is not a one-time event. It is very important that you monitor your Chemsico Insect Bait REP stakes as directed and replace all stakes after twelve (12) months of use.

See "Reducing the Risk of Termites" and "Important Usage Notes" for more information. Chemsico Insect Bait REP termite killing stakes are not recommended as sole protection against termites, and for active infestation, get a professional inspection.

If you have any questions, please visit our website at www.zzzzzz.com, or call our Consumer Service [hotline] at 1-800-xxx-xxxx.

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WHAT YOU SHOULD KNOW ABOUT TERMITES

It has been suggested that there are only two types of homes: those that have termites and those that will have termites in the future. Whether you live in the north or south, or have a new or old home, your home is a target for termites. Termites enter your home through tiny cracks in the foundation or slab, through utility entry points, or anywhere that soil contacts wood. If they can't find an easy entrance point near the ground, they will construct mud tunnels up the side of a structure to access areas above ground. The damage termites cause may not be as dramatic as a fire or a tornado, but eventually it can threaten the structural integrity of your house. Their presence is not readily noticed, and damage often is discovered before the termites are seen.

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Termite Facts

- In the U.S. over 600,000 homes are infested with termites each year and cause more than \$1.5 billion in damage.
- Worker termites forage 24 hours a day, 365 days a year. They never sleep.
- Termites have been around for over 300 million years.
- Termites rarely expose themselves to light and can actually die from direct sunlight exposure.
- Subterranean worker termites forage in search of wood-based food sources.
- Termite queens are believed to live 15-25 years and are capable of laying an egg every 15 seconds.
- Formosan termites, an aggressive variety of subterranean termite, eat not only dead wood and houses but even attack live trees. In New Orleans, Formosans threaten the city's famous live oaks and termite baits are being used to help control them.
- Subterranean termite colonies can be found in the soil anywhere from 2 to 12 feet deep.
- An infested home may have up to three or four subterranean termite colonies around it.

How Do I Know If I Have Termites?

Subterranean termites are found in 49 of the 50 states and Puerto Rico (everywhere except Alaska).



Note: Levels of termite infestation in any category may vary, depending on local conditions.
 Source: Council of American Building Officials, One and Two Family Building code.

Warning Signs

Termites rarely come to the surface of what they're eating, so most of the time you will never know they have invaded your home until it is too late. If they have, you may see some of these warning signs:

- Swarming or flying termites in the house, especially near sources of light. Termites typically swarm from January to July.
- Small wings near windows, doors or in the garage.
- Mud tunnels along the foundation of your house, inside or outside.
- Small holes in the wood or drywall or buckling paint.

Swarming ants and termites look very similar. Compare these characteristics:



Termite	Ant
<ul style="list-style-type: none"> • Straight antennae • No visible eyes • Two pair of wings of equal length • Thick waist 	<ul style="list-style-type: none"> • Elbowed antennae • Eyes present • Two pair of wings of unequal length • Thin waist (hourglass shape)

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Since termites eat wood from the inside out, it may be difficult to determine the extent of an active termite infestation. If you suspect an active infestation, we recommend a professional inspection and some type of treatment to the area where termites are present.

Types Of Termites

Subterranean Termites: These are the most common type of termites, and have been estimated to cause over 90% of all termite damage in the US. These termites live in colonies in the soil and enter houses in search of wood-based food. However, subterranean termites do not live in houses, since they must constantly return to the ground for moisture and to supply the colony with food.

Each colony is built around a queen, whose sole job is reproduction. A queen can live as long as 25 years and produce thousands of eggs per year.



Queen

The colony also has soldier termites who protect the colony from predators (mostly ants),



Soldier

worker termites who provide food for the colony,



Worker

and winged reproductive termites who turn into queen termites and leave each year to start new termite colonies.



Winged
reproductives

Worker termites are the most troublesome termites to homeowners. Because they are in charge of providing food to the colony, they constantly forage in search of wood-based food, traveling as far as 250 feet from the colony. This relentless search for food makes your home a target. Fortunately, their foraging also makes Chemsico Insect Bait REP another target.

Formosan Termites: The Formosan subterranean termite is the most destructive termite in the U.S. These termites live in the ground like common subterranean termites, but have colonies that are many times greater in size. A colony of

Formosan termites may have millions of members and can consume hundreds of pounds of wood in a single year. Formosan termites are located in coastal areas and are especially prevalent in Louisiana and Hawaii. If you live in an area suspected to contain Formosan termites, the frequency of stake monitoring should be increased to once a month.

Drywood and Dampwood Termites: While subterranean termites are the most common and the variety which the Chemsico Insect Bait REP system was designed to treat, other types of termites do exist. Drywood termite colonies live in undecayed wood with little moisture and do not have to maintain constant contact with the ground. Drywood termites are found along the Southeast, Gulf and Southern California coasts.

Dampwood termite colonies live in moist wood like tree stumps or areas in a house that contain a high degree of moisture. They do not have to maintain constant contact with the ground. These termites can be 3 times the size of subterranean termites. Dampwood termites are found along the coastal areas of Northern California and the Pacific Northwest. Homes in one of these areas can have subterranean and some other type of termite.

If you live in an area where drywood, dampwood and/or Formosan termites are found, regular inspections, by a certified professional pest control operator, are recommended to determine if these types of termites are in your home.

Reducing the Risk of Termites

Chemsico Insect Bait REP termite killing stakes are not recommended as sole protection against termites, and for active infestations get a professional inspection.

In addition to using Chemsico Insect Bait REP, here are some important steps you can take to reduce the risk of termite infestation.

- **Eliminate any sources of moisture for termites.** Check for leaky water spigots, sump pumps or sprinklers. Look for any areas that stay moist for a long time, such as mulch or under bricks or large rocks and ensure that water flows away from your home. Also check for interior leaks in pipes or from roof drainage. Pay particular attention to areas near kitchens or bathrooms, and attached porches or decks.
- **Remove potential food sources** that will attract termites to the vicinity of your home. These include direct wood-to-soil contact (fences, stairs, trellises), wood piles, stumps or dead bushes and other wood debris.
- **Apply a pre-treatment.** When building a new home, check with your contractor for soil pre-treatments that can be applied by an authorized pest control operator.

- **Have a regular termite inspection.** Certified termite inspectors can point out other areas that attract termites to your home and may recommend other treatments such as mechanical alteration, soil or foundation treatments.

Inspecting For Termites

Regular termite inspections are an important step in an effective termite program. Most states have guidelines and certification programs for termite inspectors. When having your home inspected, make sure the person or firm is authorized by your state to inspect for termites. A typical termite inspection will involve the following steps:

1. **An examination of your house foundation** searching for termite mud tunnels. Subterranean termites live in colonies in the ground. In order for them to enter an above ground food source, such as a house, they construct mud tunnels to protect them during their journey from the colony to the food source. Mud tunnels are constructed of dirt and are about as thick as a pencil. Any mud tunnels must be inspected for termite activity. This is accomplished by breaking off a 1-2 inch section of the tunnel [tube] and looking for termites. If termites are present, the tunnel [tube] is active. If termites are not present and the tunnel is not reconstructed in one week, then the tunnel is inactive. If during that time, the tunnel is reconstructed, the tunnel is active. If termites are found, a sample should be collected for identification (see note on page X).



2. **An examination of any direct wood-to-ground contact** outside of the house. All wood, including treated lumber, which has direct contact with the soil must be inspected for termite activity. Examples of direct wood-to-soil contact include wood fences, steps from your house, wooden decking and steps, landscaping timbers and mulch beds. This wood is inspected for termite activity at or near ground level by probing with a screwdriver or other sharp object. If the wood is easily penetrated, the wood has been damaged by termites, fungus, or some other wood-destroying organism. Termite activity is indicated by the presence of termites in the wood or signs that they have been feeding at this site. Signs of feeding include termite foraging galleries, dirt or mud present in the wood and/or small trails or holes in the center portion of the wood.

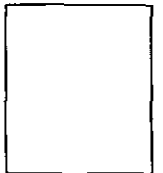


3. **An examination of the interior of your house** for signs of termite activity. Floor boards, wallboard, wood trim around windows and doors and wood in the attic must be inspected for termite activity. There are three primary signs of termite activity that should be noted during this



portion of the inspection. First, the most conclusive sign of termite activity is the presence of mud tunnels. When located, they should be inspected as noted in step one [above]. Second, areas containing moisture should receive attention. Subterranean termites require constant moisture in order to survive. Any areas in a house that retain moisture must be thoroughly inspected for signs of termite activity. Wood in these areas can be inspected by probing with a screwdriver or other sharp object (described above). Finally the house should be examined for flight exit holes. The holes are constructed to allow "swarmers" (winged termites) out to try and establish new colonies. Swarming in the US typically falls between the months of January and July. The flight exit holes look like small mud packs protruding from one or more openings and are constructed just prior to swarming.

4. **An examination of outside areas** that are favorable for termite activity. Favorable areas include those that retain moisture around downspouts, spigots, air conditioner lines, and low areas with improper drainage. Other conditions favorable for [conducive to] termite activity include areas that provide a source of food such as direct wood-to-ground contact, woodpiles, mulch beds, wooden fences, tree stumps and landscaping timbers. All favorable areas should be thoroughly inspected for termites. Termites can be detected by the presence of mud tunnels, by inspecting wood with a probe, and by sampling the soil in these areas. Sampling the soil may be accomplished by using a small hand trowel or shovel to dig holes in the ground to a depth of 6-8 inches. **These holes must be dug at least 12-18 inches away from the foundation to leave any barrier chemical undisturbed.** Once the soil is removed the hole must be checked for termite activity.



NOTE: If termites are found during any part of the inspection, a sample should be collected and the species of termite identified. Any termites collected during the inspection can be preserved in a glass jar with rubbing alcohol. Entomologists at state universities, county extension agents, or authorized certified professional pest control operators can aid in the identification of the termite species.

Where To Look

Listed below are additional areas to check for possible termite activity.

- Cracks in concrete foundation.** These give termites hidden access to your home.
- Posts in concrete.** If the post goes all the way through the concrete to the soil underneath, termites can attack the wood.

- ❑ **Earth-filled porches.** Soil should be at least 6 inches (15 cm) below the level of any wooden supports.
- ❑ **Formboards.** If left in place after construction is completed, they provide excellent termite food.
- ❑ **Leaking pipes or faucets.** They keep the wood or soil underneath continually moist.
- ❑ **Shrubby near air vents.** Anything that blocks air flow causes air underneath the house to remain warm and moist – an ideal climate for termites.
- ❑ **Debris under and around house.** Scrap pieces of wood support a termite colony and permit termites to increase in number to the point that the home is eventually attacked.
- ❑ **Low foundation walls or footings.** These permit wooden supports to contact the soil.
- ❑ **Brick veneer covering foundation.** If bond fails, termites have hidden entrance between exterior and foundations.
- ❑ **Flower planters.** If built against the house, they allow direct access to unprotected veneer, siding, or cracked stucco.
- ❑ **Wood forms around drains.** Forms left in a hole in the slab where a drain enters the building provide a direct route to inner walls.
- ❑ **Porch steps on ground.** Steps in contact with soil literally offer termites a stairway to your home.
- ❑ **Area around heating unit.** Soil here is kept warm year-round, which accelerates termite development.
- ❑ **Paper collars around pipes.** Paper is made of wood, which is the termites' food source.
- ❑ **Trellises.** If a trellis touches the soil and is connected to the house, it provides a direct link for termites from soil to wood.

[TERMITES ARE A NEIGHBORHOOD PROBLEM!!

Subterranean worker termites forage up to 250 feet from the colony in search of wood-based food sources. The termites searching for food in your yard might have their colony next door. Share the information from this booklet with your neighbors to help further reduce the risk of termites.]

Optional graphic of neighborhood

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For outdoor use around the home.*

Step 1:

Gather together:

Representative graphics

- Chemsico Insect Bait REP stakes and locator shields
- Tape measure
- Graph paper included with this booklet
- Auger
- Power drill (optional).

Step 2:

Determine the number of stakes you will need. The number of stakes is determined by the distance, in feet, around your home. To estimate, use the square footage of your home excluding your garage, attached decks, patios and porches. Home designs vary, but if you know the approximate square footage of your home the chart below will help you choose the number of stakes you need.

Graphic of table that shows stakes per square foot.

Step 3:

Prepare a drawing of your house using the graph paper in the back of this booklet. This will help you to locate the stakes during the inspection process. Include features on the drawing such as doors, bushes, chimneys, etc. Look for areas that are likely to support termite activity and note them on your drawing. These might include areas that retain moisture around downspouts, spigots, air conditioner lines, and low areas with poor drainage. Direct wood-to-ground contact is a source of food for termites. Be sure to note fences, stairs, trellises, woodpiles, mulch beds, wooden retaining walls, tree stumps, and landscaping timbers.

Step 4:

Place the stakes around the house. Install stakes 2 to 3 feet away from the foundation and no more than 10 feet apart. Place two or more stakes closer together

in "termite critical" areas. These are the areas noted [above] in Step 3 that contain a source of moisture or food for termites, or are known to have termite activity.

Before digging any holes, locate and avoid all potential underground hazards such as gas, electric, water and other utility lines, as well as sprinkler systems, landscape lights, phone or television cables and underground pet fencing systems. Call your utility company for assistance if needed.

To place the stakes manually, assemble the auger by screwing the handle onto the auger shaft tightly. To create a hole, push down and twist the auger [counter] clockwise 3 to 5 revolutions. Then pull the tool out of the hole and tap on the ground or scrape to remove accumulated soil. Twisting the auger more than 3 to 5 revolutions may make it difficult to remove. Repeat as necessary until the hole is approximately 7 inches deep. To use the auger in an electric drill, insert the shaft into the drill. Drill a few inches at a time, then pull the auger from the hole and remove accumulated soil. Repeat as above. **Read and follow all instructions provided by your drill manufacturer, including proper eye protection. Keep children and pets away during installation. Warning: Do not use auger for any purpose other than installation of the termite detection stakes.**

Before inserting the stake in the hole, slide the locator shield into place with the [brand name] logo facing up. The stake should be inserted so that the bottom of the locator shield is even with ground level [as shown] The locator shields will help you locate the stakes by preventing grass overgrowth.

Graphic of stake and shield

Note: Do not install this product in wells. Do not install this product into insecticide treated soil or spray this product with any insecticide. Do not place stakes in an area where there is the possibility of contaminating food or surfaces that come in contact with food. Do not install this product in contact with water. Do not use more than 40 stakes per home [structure]

- If you have sandy or hard packed clay soil you may need to moisten the ground before you begin digging. Never hammer directly on the stakes. You could also use some other tool to dig the holes for the stakes, but always check to be sure the locator shield is at ground level.
- When placing the stakes, use a system to help you remember where you placed each stake. For example, you could start from a corner of your house and place a stake every three steps around of the house. You may also want to make a small mark on the foundation of your house indicating the location of each stake.

Step 5:

After the stakes [and locator shields] have been installed, be sure to note the installation date and location of each stake on your drawing.

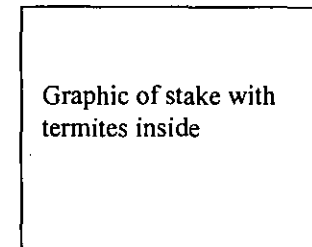
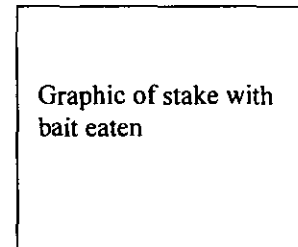
If you live in an area suspected to contain Formosan subterranean termites, these areas will require more frequent inspection. See page [x] to learn more about Formosan termites.

Step 6:

Fill out and mail the [enclosed] [attached] warranty registration card.

Step 7:

Using the drawing to locate the stakes, check the stakes for termite activity by pulling the stake from the ground. Look for signs that the bait has been eaten or that termites are present inside the stake. The locator shield will also help make removal of the stakes easier. It is important to check the stakes every 3 months. If you live in an area suspected to contain Formosan subterranean termites, the frequency of stake inspection should be increased to once a month.



Clean dirt off of the stake and hold it up to the light to see inside. If any material inside is missing (even a small part) or appears to be tattered, termites have been active. If you do not see signs of termite activity, it can mean that termites are not active in the area **OR** it can mean that the termites haven't yet found the stake while foraging for food. It can take up to 4 months to see evidence of termite activity.

If evidence of termite activity is found in any stake, take the following steps:

- Replace the active stake with a new stake if more than 50% of the bait has been eaten, otherwise place the original stake back in the hole;
- Place additional stakes (3 or more) within one foot of the infested stake; and
- Note the date and location of any additional stakes on the drawing of your [the] house.

All stakes must be replaced or removed every 12 months. Be sure to wash your hands thoroughly after completing the inspection. Do not use more than 40 stakes per home/structure.

4/1/01

Helpful tips

- When mowing be sure to trim grass away from locator shield to prevent grass overgrowth.
- Take care not to directly hit the stake or locator shield when using a grass trimmer.
- While the stakes are durable, limit the amount of contact if they are in high traffic area.

[Step 8:]**[FOR USE WITH THE SPECTRACIDE TERMINATE TERMITE**

DETECTION STAKE: If you have installed Terminate Termite Detection Stakes and the orange indicator has popped, replace the Termite Detection Stake with a Chemsico Insect Bait REP stake. Insert the Chemsico Insect Bait REP stake into the Terminate Termite Detection Stake locator shield and add an additional 4 stakes, with locator shields, around the replaced stake.

Remember to monitor your detection stake according package directions.]

IMPORTANT USAGE NOTES

- Since termites eat wood from the inside out, it is difficult to determine the extent of an active termite infestation. If you suspect an active infestation in your home, we recommend a professional inspection and some type of treatment to the area where termites are present. Chemsico Insect Bait REP [are] [is] not recommended as sole protection against termites, and for active infestations get a professional inspection. Stakes do not replace mechanical alteration, soil or foundation treatments.
- The steps you take to reduce the risk of termites are not a one-time or one-year event. To reduce the risk of termites, you must incorporate a continuous program year to year.
- TransFlur®, the active ingredient in Chemsico Insect Bait REP, is a slow acting insecticide. Termite baits must use slow-acting active ingredients to encourage more termites to eat the bait and die. Because it is slow acting, you will not see dead termites inside the stakes. Termites that eat the bait die.
- Results depend upon many factors and may take 1 to 4 months or longer. The time required for effectiveness depends upon how quickly the termites enter the stake and feed upon the bait. Some other factors include the type of termite involved, weather, moisture, and time of year.

- This product is intended for use only against subterranean termites, the most common type of termites found in the United States. If you live near coastal areas in the Southeast, Gulf Coast or Southern California, you may have another type of termite known as the drywood termite. The drywood termite lives in undecayed wood with little moisture and does not maintain constant contact with the ground. Therefore, the stakes located in the ground will not work against these termites. A home could have both subterranean and drywood termites in the vicinity.
- These same coastal areas may also contain Formosan subterranean termites, a very difficult-to-control termite. If you live in these areas of the country, regular termite inspections are recommended to determine if drywood or Formosan termites are in your home.
- If you live in an area suspected to contain Formosan termites, the frequency of stake monitoring should be increased to once a month.

STORAGE AND DISPOSAL

Storage: Store in a cool, dry place. **Disposal: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals**

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

First Aid

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. 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.

Questions or comments? Contact Consumer Services at 1-800-xxx-xxxx or visit our website at www.ZZZZZZZ.COM

Made in the USA by Chemsico, Division of United Industries Corporation
PO BOX 14262, St. Louis, MO 63114-0642

EPA Reg. No. 9688-209
EPA Est. No. 72774-MEX-1; 1812-GA-1, 72774-TX-1
Auger made in [Mexico] [Taiwan] [China] [Canada]

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TEXT FOR INFORMATION VIDEO

Spectracide Terminate Termite Killing Stakes

Installation Instructions

Video Script (revised 9/23/03)

Introduction

Congratulations and thank you for purchasing Spectracide Terminate Termite Killing Stakes— you have made an excellent choice.

In the next few minutes we're going to provide you step by step instructions on how to properly use Spectracide Terminate Termite Killing Stakes. Remember, proper use of the system is required to achieve the desired results.

Please remember that Spectracide Terminate Termite Killing Stakes are not recommended as sole protection against termites, and for an active infestation get a professional inspection. *(on screen graphic)*

[Graphic] This is an important phone number. If you have any questions about installing the stakes or if you believe that you are currently experiencing a termite infestation, call this number and a knowledgeable Spectracide Terminate representative will assist you.

Prevention

Prevention is the first and most important step in protecting your home against termites. Please take the following steps to reduce your risk of termite activity.

Eliminate sources of moisture. Termites thrive in moist areas. Check for leaky water spigots, sump pumps or sprinklers. Make sure water flows away from the house, particularly where down-spouts are located. Look for any areas that stay moist for a long time, such as mulch, under bricks or under large rocks. Also check for interior leaks in pipes or from roof drainage. Pay particular attention to areas near kitchens, bathrooms, attached porches, and decks.

Remove potential food sources. These sources will attract termites to the vicinity of your home. Examples include fences, stairs, and trellises that come in direct contact with the ground. These areas should be treated with a penetrating wood treatment. Spectracide Terminate has an excellent line of long-term, wood-penetrating products. Please call the Termite Information Line for more information.

Also, woodpiles should be stacked away from the house and be sure to clean up wood debris and stumps.

Apply a pre-treatment. If you're building a home consider a soil pretreatment applied by an authorized pest control operator. Talk with your contractor about this option.

Finally, have regular termite inspections by a certified termite inspector. An inspector can point out other areas that might attract termites to your home and may recommend other treatments to protect your home. A typical termite inspection will involve...an examination of your home's foundation, an examination of any direct wood-to-ground contact outside of the house, an examination of the interior of your home for signs of activity, and an examination of "termite critical" areas outside the home.

You should also perform occasional, routine inspections yourself. Look for signs of termite activity including mud tubes, wings, and pin holes in wood surfaces.

Remember protecting your home from termites is not a one-time event. It requires on-going, diligent prevention and if needed treatment.

Installation

Installing Spectracide Terminate Termite Killing Stakes is not difficult, but it is critical you follow all label directions and usage notes found on the package or in the brochure. Using the system properly is required to achieve the desired results. If you have any questions, call us at 1-888-545-5837 and a Spectracide Terminate representative will help.

Step One: Taking Inventory

Please take a moment to inspect the contents of your kit. The kit should include 20 stakes, in four packets of 5...20 locator shields...a two piece digging tool...an instruction booklet...and a warranty card. If anything is missing please call a Spectracide Terminate representative.

Next, take a moment and fill out the warranty card. It's important, because the system warranty is only valid if you complete, sign and return the card within thirty days of purchase.

Also, because termite prevention requires routine inspection, make sure to mark on your calendar 3 months from the day of installation as a reminder to inspect your stakes for termite activity.

Step Two: Planning the installation

This is an important part of the Spectracide Terminate Killing Stakes system. Creating a map will help you determine where to place the Stakes, where to find them during the inspection process, and to help keep track of termite activity and treatments around your home.

Using the graph paper provided in the back of the instruction booklet, draw a birdseye-view outline of the exterior of your home. Indicate doors, windows,

chimneys, and so forth. Indicate "termite critical" areas, these are the areas that are likely to attract or contain termites.

Also, it is very important that you make note of any potential underground hazards such as gas, electric and water lines. Call the utility companies if you need help locating these hazards. Locate and identify sprinkler systems, landscape lights, phone and television cables and pet fencing systems. Failure to locate these hazards and systems could result in damage to these systems or serious injury to yourself.

After creating the map, plan the placement of the stakes. Starting at a corner of your home lay the shields on the ground around the house, 2 –3 feet away from the foundation and approximately 10 feet apart. If you choose you may use a tape measure to ensure the proper distance. Place two or more shields closer together in "termite critical" areas. These are the areas discussed earlier that contain a source of moisture, or are known to have termite activity.

Places like patios, driveways, etc should be counted in your spacing. If you are unable to place a shield 10 feet from the next closest one, get as close to 10 feet as possible. Remember, it's important to get as close to 2-3 feet away from the foundation as possible, however, if unable to, get as close to those measurements as you can. It's a good idea to place stakes along fences and other areas where termites may forage, however do not use more than 40 stakes per home/structure. After laying out the shields make sure and mark their location on the map to ease in locating the stakes for inspection.

Step Three: Installation

It is important to avoid contaminating the stakes.

Before handling any stakes, please note the following points in order to avoid stake contamination:

- First, wash your hands thoroughly to remove any chemicals or other contaminant that may be present prior to handling the stakes.
- Never smoke while handling the stakes. Nicotine from tobacco products may repel termites from the stakes.
- Do not spray any other chemicals near the stakes, as these chemicals may repel termites, making the stakes ineffective.
- Finally, be sure to place the stakes 2-3 feet away from the foundation of your house to make sure that they are placed outside of any barrier chemical that may have been installed around the foundation.

Next, gather the stakes and the digging tool. If you choose to, you may use a power drill with the digging tool.

Open the stake packets so that you have the number of stakes that correspond to the number of shields that you have laid out. It is important to only open the packets for the number of stakes that you need. If you need to open a packet of stakes and

do not use them all, simply place any unused stakes in a bag with a zip-lock style seal and place back inside the kit. Keeping the unused stakes in a zip-lock bag will help them maintain their effectiveness.

Assemble the stakes by sliding the locator shield on to the stake with the brand logo facing up. It is very important to use the locator shield. It will help keep grass from growing over the stake and aid in finding the stakes for inspection.

NEVER HAMMER A STAKE. This will damage the stake and void your warranty. It is also important to never hammer the auger.

To place the stakes manually:

Assemble the digging tool by screwing the handle onto the auger shaft tightly. To make a hole, push down and twist the auger clockwise 2-3 revolutions. Going deeper than 3 revolutions may make it difficult to pull the auger from the ground. Pull the tool out of the ground and tap it on the ground or scrape it to remove accumulated soil. Repeat as needed until you have a hole approximately 7 inches deep.

To place the stakes using a drill:

Remove the handle from the auger and insert the auger into the drill. Begin drilling into the soil. NOTE: drilling more than an inch at a time may make it difficult to extract the auger from the ground. Drill slowly and follow the same procedures as mentioned before until you have a hole that is approximately 7 inches deep.

It is important that you DO NOT attempt to use the digging tool for any purpose other than the installation of the stakes. DO NOT try and use the digging tool to drill through wood, concrete, asphalt, or any other material except soil. Using the digging tool in any way other than its intended use could lead to serious injury.

Insert the stake into the hole, making sure that the locator shield is in place. The stake must be inserted into the ground to a level where the locator shield rests firmly on the ground. If the hole is too shallow to allow the locator shield to rest on the ground, use your auger and dig to the desired depth. Follow the same process in installing the remaining stakes.

When you are finished with the installation be sure to wash your hands thoroughly.

Step Four: Inspection

The stakes should be inspected for termite activity every three months. All stakes must be replaced or removed every twelve months.

To check a stake, pull it from the ground, clean the dirt off and hold it to the light. If any material inside the stake is missing – even a small part – or appears tattered, termites have been active.

If termite activity is found in any stake take the following steps...replace the stake with a new stake if more than 50% of the bait has been eaten. If less than 50% is gone, place the original stake back into the hole. Then, place additional stakes within one foot of the infested stake. Finally, note the date and location of any additional stakes on the map of your home.

If no sign of termite activity is found in a stake it can mean either termites are not active in that area or the termites have not yet found the stake while foraging for food. It can take up to four months for evidence of termite activity to appear.

After inspecting the stake replace the stake, making certain the locator shield again rests firmly on ground.

Wash your hands thoroughly after completing the inspection.

If evidence of termite activity is found in a stake and you're uncertain of what to do, please call our Termite Information Line. A Spectracide Terminate representative will answer your questions and provide free advice. This is a free service for Spectracide Terminate customers.

Wrap

There you have it, an easy, do-it-yourself solution to help in the prevention of termites. Remember termite control is not a one-time event, be diligent in inspecting the stakes and your home for termite activity.

Again, thank you for your purchase. If you have any questions or would like to hear about other products in the Spectracide Terminate product line please give us a call at 1-888-545-5837 or visit our website at www.spectracideterminate.com.

TEXT FOR GRAPH PAPER INSERT

Make a drawing of the outside of your house. Note areas on the drawing such as doors, bushes, chimneys, etc. that will help you to locate the [Chemsico Insect Bait REP] stakes during the inspection process. These might include areas that retain moisture around downspouts, spigots, air conditioner lines, and low areas with improper [poor] drainage. Direct wood-to-ground contact is a source of food for termites. Be sure to note areas such as fences, stairs, trellises, woodpiles, mulch beds, wooden retaining walls, tree stumps, and landscaping timbers. After the stake and locator shield are in place, be sure to note the installation date and location of each stake on your [the] drawing.

TEXT FOR LOCATOR SHIELD

Panel 1: Chemsico Insect Bait REP

Panel 2: Check stakes as directed.

Panel 3: Do Not Disturb

TEXT FOR STAKE PACKAGE STICKER

Fill out and mail your warranty registration card today.

[Open only needed sealed packages.]

[Keep package sealed [closed] until ready to install.]

What Chemsico Insect Bait REP products did you purchase and what price did you pay?

PRODUCT PURCHASED	PRICE PAID
10 Stake box	_____
20 Stake box	_____
[30 Stake box]	_____
[40 Stake box]	_____
[Termite Killing Concentrate]	_____
[Spot Treatment Power Spray]	_____
[Termite Killing Foam]	_____
[Penetrating Wood Treatment]	_____
[Termite Killing Dust]	_____
Other	_____

Name of product _____

Where did you hear about Chemsico Insect Bait REP?

Television ad Magazine Ad
 News story – article Radio Ad
 In the store

Approximately what size home do you have?

under 1,500 sq ft 1,500 to 2,500 sq ft
 over 2,500 sq ft

Is your home: one story two story other

Comments? Suggestions? _____

[Termites are a neighborhood problem. Make Chemsico Insect Bait REP your termite solution. List neighbors who might be interested in receiving free information about Chemsico Insect Bait REP]

What Chemsico Insect Bait REP products did you purchase and what price did you pay?

PRODUCT PURCHASED	PRICE PAID
20 Stake box	_____
40 Stake box	_____
[60 Stake box]	_____
[Termite Killing Concentrate]	_____
[Spot Treatment Power Spray]	_____
[Termite Killing Foam]	_____
[Penetrating Wood Treatment]	_____
Other	_____

Name of product _____

Where did you hear about Chemsico Insect Bait 2X?

Television ad Magazine Ad
 News story – article Radio Ad
 In the store

Approximately what size home do you have?

under 1,500 sq. ft 1,500 to 2,500 sq. ft
 over 2,500 sq. ft.

Is your home: one story two story other

Comments? Suggestions? _____

[Termites are a neighborhood problem. Make Chemsico Insect Bait SS your termite solution. List neighbors who might be interested in receiving free information about Chemsico Insect Bait P]

14/17

United Industries Corp.

October 5, 2004

Document Processing Desk (NOTIF)
Office of Pesticide Programs
United States Environmental Protection Agency
Room 266A Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202

Attention: Mr. George LaRocca
Product Manager

Subject: Notification per PR Notice 98-10
Chemsico Insect Bait REP
EPA Reg. No. 9688-209

Dear Mr. LaRocca:

Please find enclosed a corrected notification per PR Notice 98-10 to remove from the label the following text per the Agency's letter dated May 19, 2004 regarding our submission dated January 16, 2004:


"Now can kill twice as many termites as Chemsico Insect Bait A."

In addition, we are changing the term "Warning" to "Notice" as requested by the Agency, as to not conflict with the EPA signal word.

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.

- The following documents are enclosed in support of this submission:
- 1. Application for Pesticide (EPA Form 8570-1)
 - 2. One copy of the proposed label *with changes highlighted*
 - 3. Five copies of the proposed label
 - 4. One copy of the EPA stamped approved label

Please call me at 1-800-242-1166, Ext. 2737 you have questions or need further information. Thank you very much for your attention to our application.

Sincerely,

Jennifer D. Morton
Regulatory Specialist