

11556-146

03/27/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Douglas A. Spilker
Bayer HealthCare LLC
Animal Health Division
P.O. Box 390
Shawnee Mission, KS 66201-0390

MAR 27 2008

Dear Dr. Spilker:

Subject: Labeling Amendment; General Revisions
Credo SC Insecticide
EPA Registration No. 11556-146
Date Submitted: March 27, 2008

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

Please note that, with the acceptance of this label amendment, the official product name for this product has been changed to Credo SC Insecticide. Please use this product name in all future correspondences with the Agency regarding this product.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

Note to Reviewer: Brackets [] and parentheses () denote optional language

Credo™ SC Insecticide

For (effective) control of [ants] [(darkling beetles) (lesser mealworms)] and [hide beetles]
in and around poultry [(housing) (structures) (facilities) (buildings) (barns)].

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[Selected optional label claims bulleted here from pages 8 -10.]

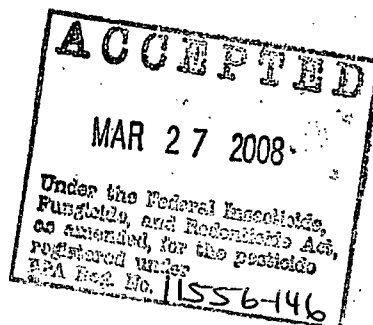
ACTIVE INGREDIENT:	
Imidacloprid [CAS 1328261-41-3]	42.8%
OTHER INGREDIENTS	57.2%
Total:	100.0%

Contains 4.38 pounds of imidacloprid per gallon, or 526 grams AI/liter.	Shake well before using.
EPA Reg. No. 11556-146	EPA Est. No. TBD

STOP - Read the label before use.
Keep out of reach of children.
CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender inglés, no use este producto
hasta que la etiqueta le haya sido explicada ampliamente.

(TO THE USER: If you cannot read or understand English, do not use this product until the label
has been fully explained to you.)



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FIRST AID	
If Swallowed:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If In Eyes:	Hold eyelids 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.
If On Skin or Clothing:	Take off contaminated clothing. Rinse skin immediately with plenty of soap and water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment call 1-800-422-9874. For customer service or to obtain product information, including the MSDS, call 1-800-633-3796.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children or pets away from treated area until dry.

Personal Protective Equipment

All pesticide handlers (mixers and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and chemical – resistant gloves made of waterproof material. After the product is diluted in accordance with label directions for use, shirt, pants, socks, shoes must be worn.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters. Apply this product only as specified on this label.

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DIRECTIONS FOR USE

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

IMPORTANT: Read the entire Directions for Use, Conditions of Sale and Disclaimer of Warranties and Limitations of liability before using this product.

CONDITIONS OF SALE: The directions for use of this product were determined through research to be appropriate for the correct use of this product. This product has been tested under different environmental conditions similar to those that are ordinary and customary where the product is to be used. Insufficient control of pests or plant injury may result from the occurrence of extraordinary or unusual conditions, or from failure to follow label directions. In addition, failure to follow label directions may cause injury to animals, man and damage to the environment. Bayer offers, and the buyer accepts and uses, this product subject to the conditions that extraordinary or unusual environmental conditions, or failure to follow label directions are beyond the control of Bayer and are, therefore, the responsibility of the buyer.

Do not formulate this product into other end-use products.

[(DARKLING BEETLE) (LESSER MEALWORM)] [AND HIDE BEETLE] CONTROL IN AND AROUND POULTRY [(HOUSING) (STRUCTURES) (FACILITIES) (BUILDINGS) (BARN)]

Use [(Credo SC) (this product)] as a general surface, spot, or crack and crevice treatment to floors, walls and support beams of [(poultry) (broiler) (turkey) (caged egg layer) (breeder)] [(housing) (structures) (facilities) (buildings) (barns)]. **Do not apply when birds are present.** Cover or remove exposed feed and water from the area to be treated. Allow treated surfaces to dry before restocking/reintroducing [(birds) (animals)] into the [(house) (structure) (facility) (building) (barn)].

MIXING AND APPLICATION RATES: Determine the [(area) (number of square feet (ft²))] to be treated. Refer to Mixing Table below for amount of [(Credo SC) (this product)] to be used. Mix the required amount of [(Credo SC) (this product)] with the [(appropriate) (desired)] amount of water and apply as a spray. Fill the sprayer tank with ½ of the water [(required) (needed) (necessary) (desired)] for the treatment. Begin agitating the water and add the required amount of product to the tank. Continue mixing and add the remaining water. Maintain sufficient agitation during product application to ensure a uniform spray. Prepare a fresh spray mixture before each treatment.

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MIXING TABLE FOR Credo SC

<i>Pests to Control</i>	<i>Credo SC Per 1,000 ft²</i>	<i>Gallons of Water Per 1,000 ft²</i>
Darkling Beetles [Hide Beetles]	3 fl. oz.* (90 mL*)	½ -2 gallons

* Equivalent to 45 grams of imidacloprid a.i./1,000 ft²

CONVERSION KEY: 128 fl oz = 1 gal, 16 fl oz = 1 pint, 8 pints = 1 gal, 1 fl oz = 29.5 mL

WHEN TO APPLY: Apply [(between flocks) (after each grow-out) (following de-caking) (to new litter following clean-out) (following sanitation procedures) (prior to placement of a new flock)].

HOW TO APPLY

Band Application: When darkling beetles are concentrated in certain areas, such as under feed or water lines, or along the perimeter walls, it may not be [(necessary) or (desirable)] to treat the entire [(floor area) (litter surface)] of a [(poultry) (broiler) (turkey) (caged egg layer) (breeder)] house. In these situations, certain portions [of the house] [or "bands"] may be treated. For example, [(apply) (spray)] diluted Credo SC [(on) (to)]: a 3-foot wide band of litter [surface] under all of the [(feed) (water)] lines in the house; a 3-foot wide band of litter [surface] adjacent to the side and end walls; and the lower [(section) (portion)] of the walls, including 1 foot up onto wood surfaces above the [concrete] foundation. Be sure to measure the [(actual) (surface) (area) (square feet)] to be treated in order to determine the [amount] [quantity] of [(Credo SC) (this product)] [(needed) (required) (necessary)] for the [(application) (treatment)].

Whole House Application: When darkling beetle infestation is severe, the entire house may need to be treated. Apply diluted [(Credo SC) (this product)] as a broadcast spray to the litter covering the entire floor area, especially to litter under feed and water lines, as well as to the lower sections of walls, including 1 foot up onto wood surfaces above the concrete foundation.

FOR BEST RESULTS: In houses with support beams, treat the litter surface around each support post, and 1 foot up each post. Also apply diluted spray to cracks and crevices around wall insulation, where beetles have been seen or can find harborage.

[INSECTICIDE ROTATION] [INTEGRATED PEST MANAGEMENT (IPM)] [RESISTANCE MANAGEMENT]

Darkling beetles, like all insects, have the ability to develop resistance to insecticides. When a single chemical class is used [(continuously) (flock after flock) (year after year) (time after time)], this [(enhances) (increases) (maximizes)] the [(likelihood) (probability) (certainty) (chance)] that resistance to that chemical class will develop. [(Credo SC) (this product)] contains imidacloprid, which belongs to the class of chloronicotinyl insecticides. [(Credo SC) (this product)] should be

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used in a [(rotational) (insecticide rotation)] program with other [classes of] insecticides [(such as) (including, but not limited to)] [pyrethroids] [(such as) (Tempo® products) (Tempo® SC Ultra)] [organophosphates] [spinosyns], to prevent [the development of] resistance and [(preserve) (prolong) (protect) (maintain) (increase)] the product's [(useful life) (usefulness) (effectiveness) (efficacy) (longevity) (value)] for darkling beetle control.

- Read and follow ALL label directions when [(using) (applying) (treating with)] [(Credo SC) (this product)] or any other insecticide [product].
- Do not use [(Credo SC) (this product)] or any other insecticide [product] at [(less) (lower)] than the recommended label rate. This exposes the insects to a [(sub-lethal) (non-killing)] dose and [(hastens) (speeds up) (accelerates) (favors) (increases)] the development of resistance.
- Use [(other) (Integrated Pest Management) (IPM)] [(strategies) (tactics) (practices) (measures)] in addition to [(insecticide) (chemical)] [(applications) (treatments)] to [(manage) (control)] darkling beetle populations.

[Contact] [Talk to] your [local] Bayer [Animal Health] representative or your [local] Cooperative Extension Service for advice concerning the use of [(Credo SC) (this product)] and [(appropriate) (helpful) (suitable)] [(resistance management) (insecticide rotation)] [(strategies) (tactics) (practices) (measures)].

[NOTE: When pest exclusion at possible entry points is desired, supplement Credo SC [litter] treatments with [targeted] [(applications) (treatments)] of a [(pyrethroid) (insecticide)] [such as (Tempo® SC Ultra) or (Tempo® 20 WP)] to the building perimeter, foundation, doors and windows, utility entry points, and other places where pests may enter the structure. Read and follow all label directions for use of [(these other) (companion)] products.]

FOR CONTROL OF ANTS IN AND AROUND ANIMAL [(HOUSES) (FACILITIES) (BUILDINGS) (BARN)] AND OTHER STRUCTURES

Prepare a sufficient quantity of a 0.05 to 0.1% solution of [(Credo SC) (this product)] by referring to the following table.

GALLONS WATER		0.05%	0.10%
1	PLUS	3.8ml (0.75 tsp)	7.5 ml (1.5 tsp)
2		7.5ml (1.5 tsp)	15.0 ml (1 tbs)
5		18.2 ml (3.7 tsp)	36.5ml (2.5 tbs)
10		36.5 ml (2.5 tbs)	73.0ml (2.5 fl. oz.)

Apply a 0.05 to 0.1% solution as a general surface, spot, crack and crevice or wall void application. Apply to surfaces on buildings, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or drilled holes) where these pests enter the structure or where they crawl or hide. Spray into cracks and crevices. Spray into voids where these ants or their nests are present. Apply the volume of

Reason to Issue: EPA required changes from SAL 1/8/08,
NOTIF, dated 3/20/08; & PR Notice 2700-4.

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spray, mist or foam sufficient to cover the area, but do not allow excessive dripping or run-off to occur from vertical or overhead surfaces.

Treat soil, turf or ground cover adjacent to the structure where ants are trailing or may find food or harborage. Apply to flower, shrub or ornamental plant beds adjacent to the structure where ants may find food or forage. To control ants tunneling in soil apply a 0.05% to 0.1% solution as a drench at intervals to establish a continuous treated zone. Treat along the edge of walls, driveways or other hard surfaces where ants are tunneling beneath the surface.

Aerial Nests: If ant nests are located in tree hollows or non-structural wooden construction (e.g.; posts, fences, decks) treat the interior cavity and/or the nest site by injecting a 0.05%-0.1% solution as a spray mist.

Apply in sufficient water to cover the foliage and soil area being treated. Maximum application is once per month to maintain control.

Do not allow residents or pets into the immediate area during the application or contact with treated areas until spray has dried. Interior applications for ant control are limited to spot, crack and crevice, or wall void applications only.

Do not use this product against native or imported fire ants, harvester ants or pharaoh ants.

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STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area. Handle and open container in a manner as to prevent spillage. If the container is leaking, invert to prevent leakage. If container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticide below. In spill or leak incidents, keep unauthorized people away. You may contact the Bayer Emergency Response Team for decontamination procedures or any other assistance that may be necessary. The Bayer Kansas City Emergency Response Telephone No. is 1-800-414-0244, or contact Chemtrec at 800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Residue Removal: Triple rinse as follows: Empty remaining contents into application equipment or mix tank and drain for 10 seconds after flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this process two more times.

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

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LIMITED WARRANTY AND LIMITATION OF DAMAGES

Bayer HealthCare LLC, Animal Health Division warrants that this material conforms to the chemical description on the label. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY, and no agent of Bayer is authorized to do so except in writing with a specific reference to this warranty. Any damages arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values, etc.

NET CONTENTS:

TEMPO is a registered trademark of Bayer.

Produced for



Bayer HealthCare

Bayer HealthCare, LLC
Animal Health Division
P.O. Box 390
Shawnee Mission, KS 66201
<http://www.bayer-ah.com/livestock.cfm>

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Additional/Alternative Marketing Claims

Formula:

- One dose formula
- No dust
- Quick mix (liquid) formula
- Specifically formulated for control of darkling beetles
- Specifically formulated for the poultry industry
- Quick mix and spray formula
- Mix & Go (liquid) formula
- One dose mix-and-go (liquid) formula
- Formulated to meet the needs of poultry operations
- Darkling beetle control (product) designed (formulated) specifically for poultry producers
- Darkling beetle control (liquid) formula
- Easy to apply, hard on darkling beetle (formula)
- Quick Mix and Apply (Product)
- Contains [(imidacloprid) (a chloronicotinyl insecticide)]

Benefits:

- Controls darkling beetles that may [(carry) (spread) (transmit)] poultry disease-causing organisms
- Controls darkling beetles that may damage [(buildings) (ceilings) (insulation) (walls)]
- Controls darkling beetles that can feed on grain
- Controls both [(darkling beetle) (lesser mealworm)] [and hide beetle] larvae and adults
- Effective against both [(darkling beetle) (lesser mealworm)] [and hide beetle] larvae and adults
- Stop (reduce) (alleviate) (take out) the risks darkling beetles [(pose) (bring)]
- Stop the damage and risks that darkling beetles cause
- Stop darkling beetles from [(taking)(eating)] your profitability
- Reduce darkling beetle risk(s)
- Reduce risks that darkling beetles [(pose) (bring)]
- Reduce impact on neighboring communities
- Reduce darkling beetles' negative impact on [poultry] [(production) (performance)]

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Application:

- Effective control of [ants] [(darkling beetles) (lesser mealworms)] [and hide beetles]
- [(Targeted) (Banded)] [(application) (treatment)] delivers effective [(darkling beetle) (lesser mealworm)] [and hide beetle] control
- One dose – effective, (easy) (simple) to use
- [(Focused) (Targeted) (Strategic)] band [(treatment) (application)]
- Allows labor saving band [(treatment) (application)]
- Broadcast or banded treatment (application)
- Less time consuming (band) [(application) (treatment)]
- Easy and flexible treatment (options)
- Time Saving Band Application
- Mix and spray – fast and flexible treatment technology
- Credo SC can be applied as either a band or broadcast (spray) treatment
- Controls even pyrethroid [(spinosad) (organophosphate)] resistant [(darkling beetle) (lesser mealworm)] [and hide beetle]
- Use less insecticide (per house/building/barn) with a banded application
- Less insecticide – [(targeted) (banded)] [(application) (treatment)]
- Easy and targeted control of [(darkling beetle) (hide beetle) (lesser mealworm)]
- [(Protection) (Control)] exactly where you need it
- Flexible application for any poultry operation
- Save time, labor and money with [(targeted) (focused)] band application
- Banded application saves time, labor and money; Provides effective control
- Apply [(treatment) (control)] right where you need it
- Easy (One) Dose Technology
- One dose, mix, and spray – Quick and Easy
- Target [(darkling beetles) (lesser mealworms)] [and hide beetles]

General:

- The active ingredient in Credo SC (imidacloprid) has been proven to provide effective control of [ants] [(darkling beetles) (lesser mealworms)] [and hide beetles]
- Controls darkling beetle adults and larvae
- The solution to [(darkling beetle) (lesser mealworm)] [and hide beetle] control
- [(Control) (Reduce)] darkling beetles that can [(spread) (carry)] disease causing organisms

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Rotation Benefits:

- Rotate with [(Tempo) (Tempo Ultra)] to manage (darkling beetle) resistance
- Team up with Credo SC and [(Tempo) (Tempo Ultra)]
- [(Manage) (Prevent)] resistance - rotate (with) (between) Credo SC & [(Tempo) (Tempo Ultra)]
- Team up with the Rotation (Combination): Credo SC & [(Tempo) (Tempo Ultra)]
- [(Prevent) (Manage)] resistance with the rotation (combination) (products) (team): Credo SC & [(Tempo) (Tempo Ultra)]
- Rotation (Team) Technology
- The Credo SC & [(Tempo) (Tempo Ultra)] Team [(prevents) (manages)] resistance
- For maximum results, Team up with the Rotation Combination