



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 16, 2015

Cheryl Wagner
Agent for Trece, Inc.
Wagner Regulatory Associates
P.O. Box 640
Hockessin, DE 19707

Subject: Labeling and Formulation Amendment – Acceptable Response to Not Grant Letter dated 08/06/2015 Involving New Source of Active Ingredient and Minor Label Revisions
Product Name: Japanese Beetle Bait II
EPA Registration Number: 51934-2
Application Date: September 9, 2015
OPP Decision Number: 510116

Dear Ms. Wagner:

The amended labeling and Confidential Statement of Formula (CSF) referred to above, submitted in response to the Agency's Not Grant letter (dated August 06, 2015), and in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following acceptable CSF:

- Basic CSF dated 11/30/2015

Any CSFs other than those listed above are superseded/no longer valid.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

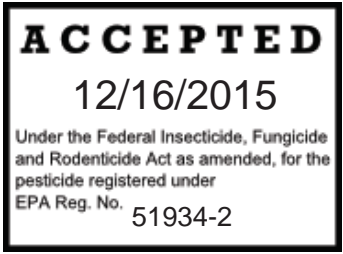
If you have any questions, please contact Gina Burnett of my team by phone at (703) 605-0513 or via email at burnett.gina@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "For Andrew C. Bryceland". The signature is stylized and written over a light blue horizontal line.

Andrew C. Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure



JAPANESE BEETLE BAIT II

Fits All Traps

Catch up to 50% More Beetles with the Trece Beetle Trap

This package Contains:

Option A – when lures are packaged separately

- One floral lure cup containing improved aromatic formula with geraniol
- One sex-lure (in sealed pouch).

Option B – when lures are packaged together

One dual lure containing a food-floral attractant and a sex lure attractant in a sealed tray with removable top.

Acting together, these lures attract both male and female Japanese Beetles in quantities unsurpassed by other lures.

FLORAL LURE
Net Weight 8.00 g

ACTIVE INGREDIENTS

Eugenol.....	22.25%
Geraniol.....	9.50%
2-Phenyl Ethyl Propionate.....	9.50%
INERT INGREDIENTS.....	58.75%
Total	100.00%

SEX LURE (PHEROMONE)
Net Weight 750 mg

ACTIVE INGREDIENT

(R,Z)-5-(1-Decenyl) dihydro-2(3H) furanone*.....	0.133%
INERT INGREDIENTS.....	99.867%
Total	100.00%

*1 mg. per dispenser.
Or
no mention of 1 mg.

KEEP OUT OF REACH OF CHILDREN
CAUTION

SEE BACK/SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS / SEE BACK_ PANEL FOR DIRECTIONS FOR USE

EPA Reg. No. 51934-2

EPA Est. No. 51934-OK-001

Manufactured and Sold by:
Trece Inc.
7569 Highway 28 West
Adair, OK 74330

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Avoid contact with, eyes, or clothing. Wash thoroughly with soap and water after handling.

FIRST AID	
If on skin or clothing:	If on skin or clothing: <ul style="list-style-type: none">▪ Take off contaminated clothing.▪ Rinse skin immediately with water for 15-20 minutes▪ Call poison control center or doctor for treatment advice.
If in eyes	If in eyes <ul style="list-style-type: none">▪ Hold eye open and rinse slowly and gently with water for 15-20 minutes.▪ Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.▪ Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For outdoor residential use. Do not use this product around ponds and/or bodies of water.

Alternate assembly instructions- Option A when lures are packaged separately.

TRAP ASSEMBLY:

- Open the green plastic floral lure cap and place it upside down in the cut-out space between the vanes of the trap.
- Remove the sex lure from the foil pouch and push the small end of the dispenser firmly into the hole provided in the lower portion of the vanes.

Alternate assembly instructions- Option B when lures are packaged together (Dual Lure)

TRAP ASSEMBLY:

- Remove trap top and bottom from box.
- Attach bottom to top by screwing bottom into the base of the trap.
- Peel top from the Dual Lure attractant.
- Insert the Dual Lure into one vane slot then tip upward to insert into opposite vane slot.
- Dual Lure dispenser should face inward toward vanes. (*Do not remove contents!*)
- Attach 18" twist tie hanger to eyelet at top of trap.

Alternate assembly instructions- Option C when lure (Dual Lure) is used with disposable bag device.

TRAP ASSEMBLY:

- Remove vanes, bag and lure from box.
- Attach bag to the hooks on the sides of the vanes.
- Peel top from the Dual Lure attractant.
- Insert the Dual Lure vane slots with dispensers facing the vanes.

- Attach 18” twist tie hanger to eyelet at top of trap.

Alternate assembly instructions- Option D when Dual Lure used with plastic cage device to catch beetles

TRAP ASSEMBLY:

- The Floral Lure and Sex Lure are packed together.
- Remove the foil from the Floral Lure and Sex Lure package and push the small end of the package bottom firmly into the holes punched in the lower portion of vanes.

Alternate hanging instructions- Option A when hanging device needs to be assembled.

HANGING TRAPS:

- Using the 18’ twist-tie (included) hang traps from a metal or wooden stake 3 to 5 feet above the ground at least 8 to 25 feet downwind from plants you are protecting.
- Be sure that the rod or stake is strong enough to prevent traps from detaching in windy conditions.

Alternate hanging instructions- Option B when hanging device already assembled.

HANGING TRAPS:

- Hang trap on a metal stake or other rod, using wire attachment located on trap, 3 to 5 feet above the ground at least 8 to 25 feet downwind from plants you are protecting.
- Be sure that the rod or stake is strong enough to prevent traps from detaching in windy conditions.

Alternate assembly and hanging or placement instructions- Option C when using collapsible or hard plastic trap.

ASSEMBLY:

1. Slide the vanes together at open slots. Make sure the ends slide into the channels of the vanes.
2. Attach vanes to funnel. The four vanes clip into the funnel body.
3. Lock the funnel and vanes into the expandable collection cage.
4. Hold top of trap with one hand and pull cage bottom down with the other hand.

INSTALLING DUAL LURE SYSTEM:

1. Remove dual lure from bottom of collection cage. Peel off covering of the dual lure package as marked on package.
2. Position dual lure so that the open side faces inward toward the trap. **Do not remove the contents.**
3. Insert one edge into one vane slot, then tip upward to insert into opposite vane slot.
4. Your trapping system is now ready to use.

PLACEMENT:

The hanger loop on the vane is used to suspend the trap. To be most effective, the trap should be located about 10 feet downwind of foliage to intercept beetles heading toward it. Do not place the trap near or in the foliage as it will attract more beetles into the foliage. (Experience has shown that a height of about 3 1/2 to 4 ft. intercepts large numbers of beetles). Traps work better in bright, open areas rather than shade.

Suggested Trap Maintenance- Option A when lure(s) used with plastic cage.

TRAP MAINTENANCE:

- Inspect trap at least 3 times weekly.
- Empty cage when half full.
- Make sure vent holes are open.
- Place beetles in garbage bag and secure. Or, bury dead beetles in garden.
- Replace Dual Lures at end of infestation season; attractants last all season.

Suggested Trap Maintenance- Option B when Dual Lure used with disposable bag.

TRAP MAINTENANCE:

- To replace bag, grasp the neck of the bag firmly in one hand and detach at each vane hook with the other hand.
- Twist neck of bag and secure with a 6” twist tie.
- Place bag in securely covered garbage container.
- Replace bags when full or when they begin to emit an offensive odor, which can repel Japanese beetles.
- To reduce build up of odors or when holes become blocked during wet conditions, use a toothpick to unplug holes in bag to allow for drainage.
- Replace Dual Lures at end of infestation season; attractants last all season.

Suggested Trap Maintenance- Option C when Dual Lure used with collapsible trap or hard plastic trap.

TRAP MAINTENANCE:

- Inspect trap periodically.
- One dual lure bait is effective for a complete season in most instances.
- Empty the cage when it is about half full of beetles.
- The air holes in the container will reduce the odor of dead and dying beetles. If the odor grows too strong, the odor could lessen the effectiveness of the lure.
- To kill beetles, immerse cage in water,
- Dead beetles may then be placed in garbage or buried.

Trap distribution

TRAP RATE:

For maximum effectiveness, use the suggested number of traps below:

Suggested # of Traps	Size of Use Area
1	Less than 1/8 acre
2	1/8 to 1/4 acre
3	1/4 to 1/2 acre
4	1/2 acre
*	over 1/2 acre
*1 trap every 150-200 feet along perimeter	

- Kill the trapped beetles by immersing the cage in hot water.

Option 1 for nonrefillable containers: *(when the lure is sold separately)*

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Store in a cool, dry place. Do not open until ready to use.

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. At end of infestation season (or 3 months, whichever comes first), place in trash or offer for recycling if available. Do not reuse lure container.

Option 2 for refillable containers: *(when the lure and trap are sold together)*

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Store in a cool, dry place. Do not open until ready to use.

DISPOSAL: Refillable container. At end of infestation season (or 3 months, whichever comes first), place in trash or offer for recycling if available. Do not reuse lure container.

Manufactured and sold by Trece, Inc., 7569 Hwy 28 W, Adair, OK 74330

[Note to label reviewer: The following sticker is placed on the very small bait itself. The rest of the text of the label is placed on the outside cardboard container that holds the small lure. There are two options.]

Option A- when space available in bait/lure.

BAIT STICKER

Japanese Beetle Bait II
FLORAL LURE
NET WEIGHT 8.00 G

ACTIVE INGREDIENTS

Eugenol.....	22.25%
Geraniol.....	9.50%
2-Phenyl Ethyl Propionate.....	9.50%
INERT INGREDIENTS.....	58.75%
Total	100.00%

SEX LURE (PHEROMONE)

Net Weight 750 mg

ACTIVE INGREDIENT

(R,Z)-5-(1-Decenyl) dihydro-2(3H) furanone*.....	0.133%
INERT INGREDIENTS.....	99.867%
Total	100.00%

*1 mg. per dispenser. **Or** no mention of 1 mg.

KEEP OUT OF REACH OF CHILDREN

CAUTION: Read directions and Precautionary Statements on box and package label before use.

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Option B- when space is not available to maintain minimum size and the wording needs to be truncated.

(Please note that the Label Review Manual, chapter 5, allows flexibility in the ingredient statement so long as it is expressed as w/w and is the nominal concentration.)

BAIT STICKER

Japanese Beetle Bait II
FLORAL LURE
NET WEIGHT 8.00 G

ACTIVE INGREDIENTS

Eugenol.....	22.25%
Geraniol.....	9.50%
2-Phenyl Ethyl Propionate.....	9.50%
INERT INGREDIENTS.....	<u>58.75%</u>
Total	100.00%

SEX LURE (PHEROMONE)

Net Weight 750 mg

Contains 1 mg of the Active ingredient 1(R,Z)-5-(1-Decenyl) dihydro-2(3H) furanone in a controlled release dispenser.

KEEP OUT OF REACH OF CHILDREN

CAUTION: Read directions and Precautionary Statements on box and package label before use.

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Manufactured and sold by Trece, Inc., 7569 Hwy 28 W, Adair, OK 74330

Optional Marketing Claims:

- All Weather Seasonal (Plastic) Trap
- Floral & Sex Lures Attract Male & Female Japanese Beetles
- Expandable Traps
- Trap Lasts All Season
- Reusable / Durable Trap
- Effective Season Long Trapping of Japanese Beetles
- Traps Japanese Beetles [All Season Long/For Up To 3 Months]
- Attracts and Traps Japanese Beetles [All Season Long/For Up To 3 Months]
- Floral & Sex (Pheromone) Lures Attracts Male And Female Beetles
- (Uses) Pheromone and Sex Lures (To) Attract [Japanese Beetles/Male & Female Beetles]
- Contains Unique [Floral & Sex] Pheromone Lure(s)
- Save/Protects/Guards Ornamental Plants From Destructive/Relentless Beetles
- Save/Protects/Guards Your Ornamental Garden [And/& Trees] From Destructive/Relentless Beetles
- Save/Protects/Guards Your Ornamental Vegetation [And/& Trees] From Destructive/Relentless Beetles