

PM 91

51934-3

12/16/98

Page 19 13

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 16 1998

Trece, Incorporated
1143 Madison Lane
Salinas, CA 93912

Dear Mr. Lingren:

Subject: Label Amendment - Response to our December 3, 1998 letter outlining deficiencies
EPA Reg. No. 51934-3
Japanese Beetle Combo Bait
Your submission dated December 7, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable provided that you make the labeling change listed below before you release the product for shipment bearing the amended labeling:

1. You must delete the duplicate precautionary statements in Option B.
2. An establishment number should be added to all options.
3. Please add the following text to the bait sticker:

Disposal: When lure element no longer has detectable odor, wrap and dispose of it in regular trash collection.

Option D Disposal statement should be revised to read "wrap and dispose (not disposal) of it in regular trash collection."

4. It was noted that following statements should be supported by efficacy data or deleted:

Catch up to 50% more beetles with the Beetle Bait

Traps up to 5 times more beetles than ~~the~~ lure traps.

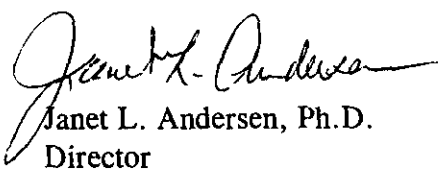
SYMBOL	7511C	7511C	7511C				
SURNAME	Loranged	Kumar	<i>[Signature]</i>				
DATE	12/14/98	12/14/98	12/15/98				

2713

5. It is recommended that you reverse the location of the precautionary statements and the storage and disposal statements on all options.

Submit five (5) copies of your final printed labeling before you release the product for shipment. A stamped copy of the label is enclosed for your record. If you have any questions about this letter please contact Judy Loranger at 703-308-8056.

Sincerely yours,



Janet L. Andersen, Ph.D.
Director
Biopesticides and Pollution
Prevention Division (7511C)

Enclosure

3 9 13

Trece Japanese Beetle Combo Bait
Proposed Master Label
EPA Reg. No. 51934-3
Expanded – Oct. 23, 1998; rev. 12/7/98
Page No. 1 of 11

Master Label

This master label bears directions for outdoor residential use.
Option A labeling is to be used only for the non-disposable bag package.
Option B is to be used only for the disposable bag with insert instructions.
Option C should only be used for the disposable bag without insert instructions.
Option D applies to packaging for replacement lure only.

ACCEPTED
with COMMENTS
In EPA Letter Dated

Trecé

DEC 16 1998

Japanese Beetle Combo Bait

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

For outdoor residential use.

51934-3

Active Ingredients

Eugenol.....	21.98%
Geraniol.....	9.43%
2-Phenyl Ethyl Propionate.....	9.43%
(R,A)-5-(1-Decenyl) dihydro-2(EH) furanone*.....	0.02%

Inert Ingredients.....	59.14%
Total	100.00%

*Includes 1.0 mg per dispenser

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See back panel for additional precautionary statements.

OPTIONAL MARKETING CLAIMS

Fits all traps * Catch up to 50% more beetles with the Beetle Bait * Protects your yard * Traps over a 5,000 sq. ft. area * Lasts the entire beetle season. * Draws Japanese beetles into the trap away from valuable ornamentals, flowers, and shrubs. * Helps to protect roses, grapes, fruit trees, and vegetables. * Attracts, but does not kill Japanese beetles. * Will last for the entire beetle season. * Traps beetles, protects your yard. * Traps up to 5 times more beetles than single lure traps.

OPTION A

DIRECTIONS FOR NON-DISPOSABLE BEETLE TRAPS

(The following directions and information are used when the combo lure is used with a cage or bottle[non-disposable] to catch the beetles.)

This package contains: One cup containing the sex lure and an improved aromatic formula with Geraniol.

This combined or dual lure attracts both male and female Japanese Beetles in quantities unsurpassed by other lures.

BEFORE USING, READ ENTIRE DIRECTIONS

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

Peel the cover from the dual lure system. Mount the opened lure between the yellow vanes by inserting the notched corners through the vane assembly slots. Make sure that the exposed side is facing INWARD and snap into place. Bend the tab on top slightly inward for protection from the rain.

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

No. of Traps	Area Covered	No. of Traps	Area Covered
1	Less than 1/8 acre	4	1/2 acre
2	1/8 to 1/4 acre	*	Over 1/2 acre
3	1/4 to 1/2 acre	* Use 1 trap every 150 to 200 feet along perimeter.	

Kill the trapped beetles by immersing the cage in hot water. Dump the dead beetles into the garbage or bury them in the garden.

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:** When lure element no longer has detectable odor, wrap and dispose of it in regular trash collection.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Avoid contact of lure with skin and eyes. In case of accidental contact, wash hands thoroughly with soap and water. If irritation occurs, seek medical attention.

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

Made in the USA by Trece, Inc. for
EPA Reg. No. 51934-3

EPA Est. No.

OPTION B

DIRECTIONS FOR DISPOSABLE-BAG BEETLE TRAPS

(The following directions and information are used when the combo lure is used with a disposable bag to catch the beetles.)

BEETLES STRIKE VANE, FALL INTO BAG, THEN DIE

COMBO OR DUAL LURE: Attracts both male and female beetles.

DISPOSABLE BAG: Prevents messy clean up.

CONTENTS: * One set of inter-locking vanes. * One hang tie. * Two trap bags.

* One dual or combo lure system.

KwikStand™, Replacement (Disposal) Bags and Lures are available.

BEFORE USING, READ ENTIRE DIRECTIONS ENCLOSED

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION:

Avoid contact of lure with skin and eyes. In case of accidental contact, wash hands thoroughly with soap and water. If irritation occurs, seek medical attention.

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or comments? Call 800-332-5663

Made in the USA by Trece, Inc. for

EPA Reg. No. 51934-3

EPA Est. No. _

PACKAGE INSERT

DIRECTIONS FOR ASSEMBLY USE:

GENERAL INFORMATION

HABITAT

The Japanese beetle is a major insect pest found throughout the eastern United States. The adult beetle infests and destroys over 300 species of plants including fruits, vegetables and flowers as well as a wide variety of valuable ornamental trees and shrubs.

LIFE CYCLE

In early summer, when female beetles first emerge from the ground, they are immediately ready for mating. As each female emerges she gives off an extremely small amount of a distinctive scent. This sex attractant is carried downwind until it is picked up by male beetles who follow it upwind to locate the female and mate.

After mating, female beetles lay their eggs in lawns and grassy areas. Shortly thereafter grubs hatch in the soil and pass through several larval stages throughout the remaining summer months. During this period the grubs may cause extensive damage by feeding on the roots of turf and valuable plants. This damage is usually

Noticed as large brown spots in lawns and wilted plant life. With the approach of Winter, the grubs dig down below the frost line. The following year adult beetles emerge from lawns in early summer to mate, feed and continue their destructive life cycle.

OPTION B -CONT'D

DUAL FLORAL AND SEX LURE

Use of the Japanese beetle's natural sex attractant for trapping is an ideal method to aid in the control of the insect through its own natural biology. It provides a means compatible with the environment and also helps avoid the indiscriminate use of harmful chemicals. The natural sex attractant, when used together with a proven floral lure, can attract from two to five times as many beetles as the commonly available floral lure alone.

This dual lure uses the latest in controlled release technology for maximum drawing power and convenience to the user. An exact copy of the natural sex attractant is contained in a controlled release unit with a release rate that approximates that of the female beetle. Also included is a proven floral lure. Together, both lures provide a normal season's supply of the most effective Japanese beetle lure system on the market today.

NUMBER OF TRAPS NEEDED

For maximum effectiveness, use the number of traps below:

No. of Traps	Area Covered	No. of Traps	Area Covered
1	Less than 1/8 acre	4	1/2 acre
2	1/8 to 1/4 acre	*	Over 1/2 acre
3	1/4 to 1/2 acre	* Use 1 trap every 150 to 200 feet along perimeter.	

STOP. READ ENTIRE LABEL BEFORE USE.

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

TRAP ASSEMBLY/OPERATION (HOW TO USE)

1. Slide the vanes together so slots interlock.
2. LURE ATTACHMENT
Peel the cover from the dual lure system. Mount the opened lure between the yellow vanes by inserting the notched corners through the vane assembly slots as shown in Figure 1. Make sure that the exposed side is facing INWARD and snap into place. Bend the tab on top slightly inward for protection from the rain.
3. BAG ATTACHMENT
Attach one of the disposable trap bags onto the yellow vane assembly as shown in Figure 2. Gently push a small slit on the open end of the bag over each of the hooks on the vanes. Be careful not to tear or stretch the slits. Drop a few small pebbles into the bag to stabilize the trap.
4. HANGER ATTACHMENT
Insert about 3" of the hanger tie through the two holes in the top of the vane assembly as shown in Figure 3. Twist the tie to secure the trap.
5. TRAP PLACEMENT
To be most effective, the trap should be located about 30 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 it (see Figure 4). Hang the trap by its hanger tie from a KwikStand™ (sold separately) or any convenient post or stake. The bottom of the bag should be at least a foot above the ground, and the trap free to move in the wind.

(OPTION B - CONT'D)

wind without hitting any obstructions (see Figure 5). Hang the trap where it is inaccessible to small children.

6. PERIODICALLY CHECK TRAP

The majority of beetles will be caught during their highest flight activity period. This is normally on sunny days with temperatures between 70 - 95°F and from about 10:00 am to 3:30 pm.

Check bag occasionally. Replace it when the lower portion is full of beetles. Change the bags every four to five days to avoid repelling beetles due to odor of dead beetles. Inspect bag after rainstorms. If the drain holes along the bottom of the bag become clogged, gently clear them using a toothpick or pencil point or replace bag. **NOTE:** Remove trap to a protected area during heavy rain or wind.

7. SEAL BAG WHEN FULL

Seal filled bags by knotting the top funnel portion. Normally, trapped beetles die after several hours in the heat and sun. Leaving sealed bags in sun for a while can kill live beetles. **IMPORTANT:** Make sure beetles are dead before disposal. See following section on Disposal of bags.

8. LURE REPLACEMENT

For maximum effectiveness, begin trap use as early in the season as possible. Sexual activity of the Japanese beetle is greater in June in Southern states and July in Northern states. Under normal conditions, the combination lure is effective for about twelve weeks. Replace it after this period or when its floral aroma is no longer noticeable. Premature ineffectiveness of the lure may be due to a repellent odor from dead beetles. See step 6 and following section on Disposal of lures.

9. PROBLEMS THAT MAY OCCUR

a. LURE NO LONGER ATTRACTS BEETLES

- Few beetles in area
- Repellent effect of dead beetles. See Step 6.
- Dual or Combo lure is unopened or uninstalled.

b. BEETLES EATING FOLIAGE/FLOWERS AFTER SETTING TRAP

- Remove trap from immediate vicinity of foliage. See Step 5.

c. BEETLES ESCAPING THROUGH BAGS

- Animal Damage

Bags are often attacked and damaged at night by nocturnal animals (skunks, cats, etc.). Replace damaged bag. Bring trap inside each night to prevent future damage.

Replacement bags and lures are available.

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:** When lure element no longer has detectable odor, wrap and dispose of it in regular trash collection. Promptly place sealed bags containing dead beetles in trash.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Avoid contact of lure with skin and eyes. In case of accidental contact, wash Hands thoroughly with soap and water. If irritation occurs, seek, medical attention.

OPTION B - CONT'D

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

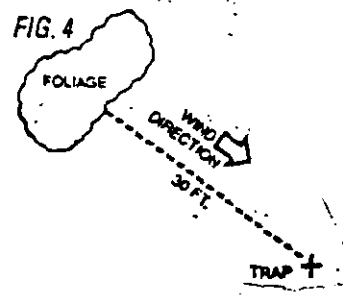
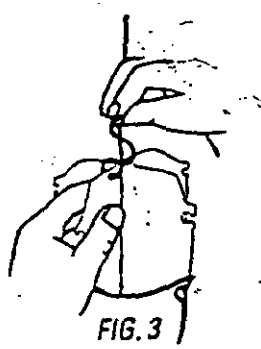
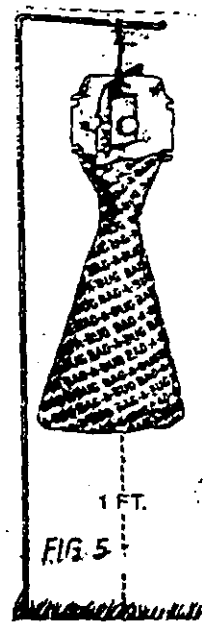
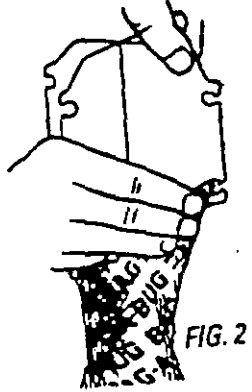
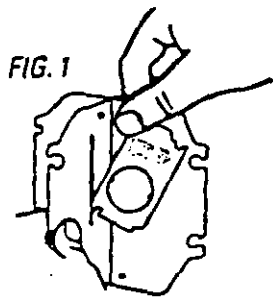
Questions or comments? Call 800-332-5663

Made in the USA by Trece, Inc. for

EPA Reg. No. 51934-3

EPA Est. No. _____

Note to reviewer: These are the five instructional figures referenced in the above Option B. These same figures are included in Option C below. They are included below.



OPTION C

DIRECTIONS FOR DISPOSABLE-BAG BEETLE TRAPS WITHOUT INSERT

(The following directions and information are used when the combo lure is used with a disposable bag to catch the beetles without instructional insert in the box.)

BEETLES STRIKE VANE, FALL INTO BAG, THEN DIE

COMBO OR DUAL LURE: Attracts both male and female beetles.

DISPOSABLE BAG: Prevents messy clean up.

CONTENTS: * One set of inter-locking vanes. * One hang tie. * Two trap bags.

* One dual or combo lure system.

KwikStand™, Replacement (Disposal) Bags and Lures are available.

(Use of the Japanese Beetle's natural sex attractant for trapping is an ideal method to aid in the control of the insect through its own natural biology. It provides a means compatible with the environment and also helps avoid the indiscriminate use of harmful chemicals. The natural sex attractant, when used together with a proven floral lure, can attract from two to five times as many beetles as the commonly available floral lure alone.)

STOP. READ ENTIRE LABEL BEFORE USE

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

NUMBER OF TRAPS NEEDED

For maximum effectiveness, use the number of traps below:

No. of Traps	Area Covered	No. of Traps	Area Covered
1	Less than 1/8 acre	4	1/2 acre
2	1/8 to 1/4 acre	*	Over 1/2 acre
3	1/4 to 1/2 acre	* Use 1 trap every 150 to 200 feet along perimeter.	

TRAP ASSEMBLY/OPERATION (HOW TO USE)

1. Slide the vanes together so slots interlock.

2. LURE ATTACHMENT

Peel the cover from the dual lure system. Mount the opened lure between the yellow vanes by inserting the notched corners through the vane assembly slots as shown in Figure 1. Make sure that the exposed side is facing INWARD and snap into place. Bend the tab on top slightly inward for protection from the rain.

3. BAG ATTACHMENT

Attach one of the disposable trap bags onto the yellow vane assembly as shown in Figure 2. Gently push a small slit on the open end of the bag over each of the hooks on the vanes. Be careful not to tear or stretch the slits. Drop a few small pebbles into the bag to stabilize the trap.

4. HANGER ATTACHMENT

Insert about 3" of the hanger tie through the two holes in the top of the vane assembly as shown in Figure 3. Twist the tie to secure the trap.

(OPTION C - CONT'D)

5. TRAP PLACEMENT

To be most effective, the trap should be located about 30 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 it (see Figure 4). Hang the trap by its hanger tie from a KwikStand™ (sold separately) or any convenient post or stake. The bottom of the bag should be at least a foot above the ground, and the trap free to move in the wind without hitting any obstructions (see Figure 5). Hang the trap where it is inaccessible to small children.

6. PERIODICALLY CHECK TRAP

The majority of beetles will be caught during their highest flight activity period. This is normally on sunny days with temperatures between 70 - 95°F and from about 10:00 am to 3:30 pm.

Check bag occasionally. Replace it when the lower portion is full of beetles. Change the bags every four to five days to avoid repelling beetles due to odor of dead beetles. Inspect bag after rainstorms. If the drain holes along the bottom of the bag become clogged, gently clear them using a toothpick or pencil point or replace bag. NOTE: Remove trap to a protected area during heavy rain or wind.

7. SEAL BAG WHEN FULL

Seal filled bags by knotting the top funnel portion. Normally, trapped beetles die after several hours in the heat and sun. Leaving sealed bags in sun for a while can kill live beetles. IMPORTANT: Make sure beetles are dead before disposal. See following section on Disposal of bags.

8. LURE REPLACEMENT

For maximum effectiveness, begin trap use as early in the season as possible. Sexual activity of the Japanese beetle is greater in June in Southern states and July in Northern states. Under normal conditions, the combination lure is effective for about twelve weeks. Replace it after this period or when its floral aroma is no longer noticeable. Premature ineffectiveness of the lure may be due to a repellent odor from dead beetles. See step 6 and following section on Disposal of lures.

9. PROBLEMS THAT MAY OCCUR

a. LURE NO LONGER ATTRACTS BEETLES

- Few beetles in area
- Repellent effect of dead beetles. See Step 6.
- Dual or Combo lure is unopened or uninstalled.

b. BEETLES EATING FOLIAGE/FLOWERS AFTER SETTING TRAP

- Remove trap from immediate vicinity of foliage. See Step 5.

c. BEETLES ESCAPING THROUGH BAGS

- Animal Damage

Bags are often attacked and damaged at night by nocturnal animals (skunks, cats, etc.). Replace damaged bag. Bring trap inside each night to prevent future damage.

Replacement bags and lures are available.

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:** When lure element no longer has detectable odor, wrap and dispose of it in regular trash collection. Promptly place sealed bags containing dead beetles in trash.

(OPTION C - CON'T)

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

CAUTION

Avoid contact of lure with skin and eyes. In case of accidental contact, wash hands thoroughly with soap and water. If irritation occurs, seek medical attention.

Notice: Buyer assumes all responsibility for safety and use not in accordance with directions.

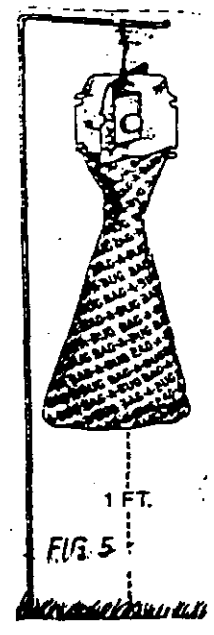
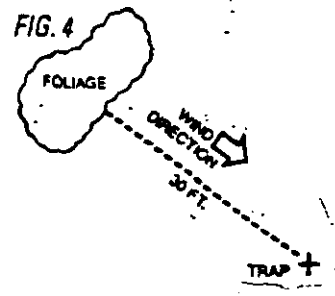
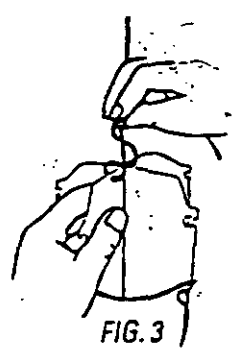
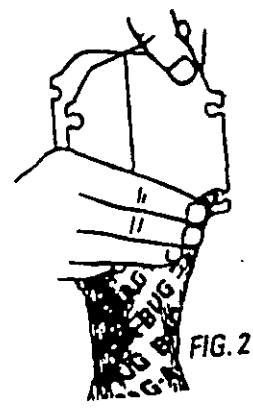
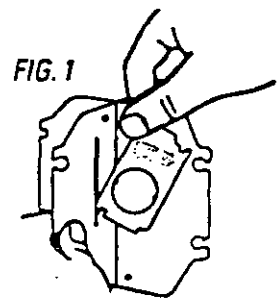
Questions or comments? Call 800-332-5663

Made in the USA by Trece Inc. for

EPA Reg. No. 51934-3

EPA Est. No. _____

Note to reviewer: These are the five instructional figures referenced in the above Option C. These are the same figures referenced in Option B. They are included below.



OPTION D

DIRECTIONS FOR REPLACEMENT LURE PRODUCT

[The following directions and information are used when the combo lure is used as a replacement lure product for the beetle trap.]

BETTER STRIKE VANE, FALL INTO BAG, THEN DIE
COMBO or DUAL LURE: Attracts both male and female beetles.

CONTENTS: One dual lure system

KwikStand™ and Replacement (Disposal) Bags are available.

Use of the Japanese beetle's natural sex attractant for trapping is an ideal method to aid in the control of the insect through its own natural biology. It provides a means compatible with the environment and also helps avoid the indiscriminate use of harmful chemicals. The natural sex attractant, when used together with a proven floral lure, can attract from two to five times as many beetles as the commonly available floral lure alone.

Active Ingredients

Eugenol	21.98%
Geraniol	9.43%
2-Phenyl Ethyl Propionate	9.43%
(R,A)-5-(1-Decenyl) dihydro-2(EH) furanone*	0.02%

Inert Ingredients	59.14%
Total	100.00%

*Includes 1.0 mg per dispenser.

KEEP OUT OF THE REACH OF CHILDREN
CAUTION

See back panel for additional precautionary statements.

STOP. READ ENTIRE LABEL BEFORE USE.

DIRECTIONS OR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

LURE ATTACHEMENT

Peel the cover from the dual lure system. Mount the opened lure between the yellow vanes by inserting the notched corners through the vane assembly slots as shown. Make sure the exposed side is facing INWARD and snap into place. Bend the tab on top slightly inward for protection from the rain. When using the combo lure for traps with no vane slots, follow the foregoing directions for opening. Punch a hole in the flat area of the combo lure. Attach a twist tie or small wire and tie lure at the top of the trap.

OPTION D - CONT'D
 See trap box for detailed usage directions.
 Replacement bags are available.

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:** When lure element no longer has a detectable odor, wrap and disposal of it in regular trash collection.

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals
CAUTION
 Avoid contact of lure with skin and eyes. In case of accidental contact, wash hands thoroughly with soap and water. If irritation occurs, seek medical attention.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.
 Questions or comments? Call 800-332-5553
MADE IN THE USA for
 EPA Reg. No. 51934-3 EPA Est. No.

Note to label reviewer: The following sticker is placed on the small bait itself. The rest of the text of Option D is placed on the outside cardboard container that holds the small replacement bait.

BAIT STICKER
Trecé
Japanese Beetle Combo Bait

Active Ingredients	
Eugenol	21.98%
Geraniol	9.43%
2-Phenyl Ethyl Propionate	9.43%
(R,A)-5-(1-Decenyl) dihydro-2(EH) furanone*	0.02%
 Inert Ingredients	 59.14%
	Total 100.00%

*Includes 1.0 mg per dispenser

KEEP OUT OF THE REACH OF CHILDREN
CAUTION
 Avoid contact of the lure with skin and eyes.
 Read Directions and Precautionary Statement in carton before use.
 EPA Reg. No. 51934-3 EPA Est. No.