

4 MAY 1994

Mr. George M. Bethurum
Bethurum Research and Development, Incorporated
P.O. Box 3436
Galveston, TX 77552

Dear Mr. Bethurum:

Subject: Addition of Pest to Product Label: Roaches
Bushwhacker
EPA Registration Number 59977-1
Submission Dated August 6, 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable subject to the comments listed below. A stamped copy of the product label is enclosed for your records.

1. The Agency accepts the addition of the pest "Roaches" to the product labeling pending acceptance of the necessary efficacy data which is currently in review.
2. Delete the pest "Termites". Efficacy data must be submitted to support the addition of this pest to the product label.
3. List the specific weevil(s) against which this product is intended to be used.
4. It is not appropriate to add the use site "banana plantations" without an amendment requesting this change. Delete this use site from the label.
5. Revise the statement "Place all 6 trays in areas where you've seen....", which appears in the directions for use concerning roaches and weevils, to read as follows: Place all 6 trays, in areas inaccessible to children and pets, where you have seen roaches...".
6. Delete the statement "These areas are considered NONFOOD AREAS when food is not exposed and the facility is not in operation".

Sincerely,



Mr. Robert S. Brennis
Acting Product Manager 10

		CONCURRENCES					
Insecticide Rodenticide Branch							
SYMBOL	Registration Division						
SURNAME							
DATE							

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Fire Ant, Roach, Termite, and Weevil Control

Use BUSHWHACKER® Fire Ant, Roach, Termite, and Weevil Control when Fire Ants, Roaches, Termites, and, Weevils are found in residential and non-residential inside and outside areas, food handling establishments, indoor food areas, indoor non-food areas, terrestrial food/feed crops, terrestrial non-food crops, and forestry areas. See back of label for details.

Active ingredient:	Boric Acid	18%
Inert Ingredients:		82%
Total:		100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Additional Cautions and Directions
EPA REG. NO. 59977-1 EPA EST. NO. 59977-TX-1

The Bushwhacker Associates, inc.
Division of Bethurum Research & Development, Inc.
Galveston, Texas 77552

Fire Ant Control Net Contents: 1 pound (454 grams) *

* Note: Additional sizes: 5 Pounds (2.2 kg.); 25 Pounds (11 kg.); 350 Pounds (154 kg.)

**Roach, Termite, and Weevil Control Net Contents: 1 pound (454 grams)
with 12 trays ***

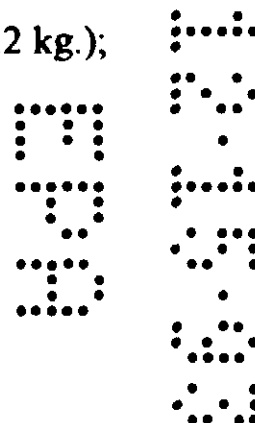
* Note: Additional sizes: 8 Ounces (227 grams); 5 Pounds (2.2 kg.);
25 Pounds (11 kg.); 350 Pounds (154 kg.)

ACCEPTED
with COMMENTS
by EPA Letter Dated

4 MAY 1994

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

59977-1



3047

**PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if swallowed. May cause eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT --- IF ON SKIN: Wash with plenty of soap and water. IF IN EYES: Remove contacts if present and flush eyes with plenty of water. Get medical attention if irritation persists. IF SWALLOWED: Call a physician or Poison Control Center.

ENVIRONMENTAL HAZARDS --- For terrestrial uses, do not apply directly to water or 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 washwaters or rinsate.

DIRECTIONS FOR USE FOR FIRE ANTS

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

**Use Bushwhacker Fire Ant Control in the following sites where
fire ants may be found:**

TERRESTRIAL FOOD CROPS --- **ROOT AND TUBER VEGETABLES:** Carrot, potato, radish, sugar beet, turnip, yam; **BULB VEGETABLES:** Garlic, leek, onion, shallot; **LEAFY VEGETABLES:** Celery, endive, lettuce, parsley, spinach; **COLE LEAFY VEGETABLES:** Broccoli, cabbage, cauliflower, collards, kale; **LEGUME VEGETABLES:** Beans, peas, soybeans, coffee; **FRUITING VEGETABLES:** Eggplant, pepper, tomato; **CUCURBIT VEGETABLES:** Cucumber, cantaloupe, honeydew melon, pumpkin, squash, watermelon; **CITRUS FRUITS:** Grapefruit, lemon, lime, orange; **POME FRUITS:** Apple, crabapple, pear; **STONE FRUITS:** Apricot, cherry, peach, plum; **SMALL FRUITS AND BERRIES:** Blackberry, blueberry, boysenberry, grape, raspberry, strawberry; **TREE NUTS:** Almond, chestnut, pecan, walnut, macadamia; **CEREAL GRAINS:** Barley, corn, millet, oats, rice, sorghum, wheat;

TERRESTRIAL FOOD/FEED CROPS --- Range land, pasture, pineapple plantations, coconut plantations, sugar cane plantations, banana plantations, citrus orchards; **FORAGE GRASSES:** Bermuda grass, bluegrass, fescue, alfalfa, clover; **NON-GRASS ANIMAL FEEDS:** Forage, fodder, straw, hay.

TERRESTRIAL NONFOOD CROPS --- **Nursery Products:** Flowering and non-flowering plants, ornamental shrubs, trees; **Lawns, Golf Courses, Camp Grounds,**

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4047
Rights-of-way, Nurseries, Sod farms, Tree farms, Turf farms, Parks, Animal and Poultry cages, pens and shelters, all electrical use, transmission and control areas including transformers, air conditioners, traffic control lights and all electrical machines or appliances.

FORESTRY ---- Forest lands and levies.

RESIDENTIAL INDOOR/OUTDOOR ---- Single and multiple human dwellings including hotels, motels, apartments, daycare centers, hospitals, nursing home.

INDOOR FOOD ---- All human, animal, poultry and aqua culture food preparation, food storage, handling, and consumption areas, poultry and egg farms.

INDOOR NONFOOD ---- School and educational institutions including dormitories and libraries, animal and competition areas, refineries including tank farms, switching equipment, pump and relay stations, business establishments, such as stores, offices and warehouses.

APPLICATION DIRECTIONS FOR BROADCAST TREATMENT

BUSHWHACKER® is very easy and convenient to apply. Following application, **BUSHWHACKER®** is collected by the worker ants, converted to liquid protein (no fire ant can eat solid food), and distributed throughout the colony to feed the queens and brood. Within six (6) to eight (8) weeks there is considerable ant mortality and continual decline of the fire ant colony. This product will kill the queens as well as worker ants. When used as directed, all signs of fire ant infestation should be gone within three to four months. Fire ants should not be present again for at least one year. **BUSHWHACKER®** may be broadcast with fertilizer, plant seeds, or clean sand. Adjust mix to retain application of **BUSHWHACKER®** at three (3) pounds per acre by broadcast. **MIX THOROUGHLY. BROADCAST IMMEDIATELY!**

Restrictions: Apply **BUSHWHACKER®** when the ground is dry to slightly damp and no rain is anticipated for 6 to 8 hours. Do not apply when strong wind or when air temperatures are below 50 degrees F. **DO NOT USE ANY OTHER PESTICIDE FOR FIRE ANT CONTROL IN COMBINATION WITH OR WITHIN SIX (6) MONTHS AFTER APPLICATION OF BUSHWHACKER®.**

Broadcast Treatment:: Hand broadcast or use a rotary type spreader with an auger feed. Broadcast **BUSHWHACKER®** evenly over the area at the rate of three (3) pounds per acre.

1. Methods of Application **BUSHWHACKER®** may be applied as a broadcast in the following ways: A. By Hand: Wear gloves to avoid contact with skin. B. A walk-behind or carried rotary spreader with an auger feed. C. Commercial power-take-off-driven or battery powered spreaders. D. Aerial Application. 2. Rates:

Broadcast **BUSHWHACKER®** evenly over the area at the rate of three (3) pounds per acre. 3. Re-treatment Interval: A second application at the above rates may be made after 5 days in severely infested areas. Allow six (6) to eight (8) weeks for signs of mound activity to begin to disappear.

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APPLICATION DIRECTIONS FOR SPOT TREATMENT

Electrical boxes: For best results use a registered fire ant product that can provide a quick knock-down inside the junction boxes or transformers to allow service personnel to perform immediate maintenance, then apply one (1) tablespoon BUSHWHACKER® to maintain a long term fire ant free environment. Fresh BUSHWHACKER® should be added or re-applied any time that transformers, junction boxes, etc. are re-opened for inspection. **Indoors:** Apply only in areas inaccessible to children and pets. Place approximately one (1) tablespoon of BUSHWHACKER® in any area where foraging ants are seen. Remove and discard after 24 hours. Include areas behind the refrigerator, stove, around water pipes, cracks and crevices around window frames, baseboards, and shelves. If used in storage or display areas, sprinkle lightly under display counters, gondolas, storage bins, or racks if product is not accessible to children and pets. For continuous control, replace with fresh BUSHWHACKER® every 3 or 4 months.

Use Bushwhacker Roach, Termite, and Weevil Control in the following areas when roaches, termites, and weevils are found:

BUSHWHACKER® ROACH, TERMITE, AND WEEVIL CONTROL may be used in homes, restaurants, and other food preparation, handling, and storage facilities; offices, hotels, motels, camps, hospitals, garages, grocery stores, bakeries, apartment buildings, mobile homes, new construction, industrial plants and facilities, theaters; ships, boats, trains, trucks, yachts, buses; zoos and kennels; aqua culture areas around water wells, reservoirs and pumps; food and food preparation areas, canning and packaging, storage, and consumption areas; electrical utility stations, sewer, control and distribution areas, transformers, air handlers and conditioners, junction boxes, pumps, valves, switching and pumping stations, pillar boxes, traffic control lights and electrical machines or appliances; daycare centers, nursing homes, school and educational institutions including dormitories, classrooms, laboratories, and libraries; refineries including tank farms, switching equipment, pump and relay stations; wild and domestic grass, brush, and forest lands; business establishments, such as retail stores, factories, and warehouses; military bases; airports; recreational vehicles, boats, airplanes, trains, and railroad right-of-ways; correctional institutions.

ROACH, TERMITE, AND WEEVIL CONTROL: For Domestic (Homeowner) and Non-domestic Use (Edible and Non-edible Product Areas)

Inside Application Directions: For effective roach, termite, and weevil control, you must use a minimum of 6 trays at once and replace all trays every three (3) to four (4) months. 1. Open container and remove plastic trays from container. Fill trays with bait. 2. Place all 6 trays in areas where you've seen roach, termite, and weevil activity. For 8

feet by 12 feet or smaller kitchens, use at least 4 trays in the kitchen and 2 in each bathroom. For more than one bathroom, you should use additional trays and place at least 4 in the kitchen and 2 in each bathroom. For larger kitchens or particularly heavy infestations, we strongly recommend using additional trays and placing at least 2 trays in each bathroom. If you discover roach, termite, and weevil activity in other areas, such as the bedroom or utility room, you will need to obtain additional trays. For best results, place trays next to walls and flush in corners. 3. Roaches, Termites, and Weevils will begin eating the bait immediately and you should expect to see less insect activity within three (3) to four (4) weeks. Remember, however, this is a bait and roaches, termites, and weevils may be attracted from other areas, especially if applied in apartments. 4. Replace all trays every three (3) to four (4) months to keep roach, termite, and weevil activity from reappearing.

Outside Application Directions: For effective roach and termite control outside, sprinkle **BUSHWHACKER®** around areas and foundations where roaches and termites are seen. Apply in late afternoon when no rain is anticipated.

FOOD HANDLING ESTABLISHMENTS: Places other than private residents in which food or feed is held, processed, prepared, or served.

FOOD AREAS (Including some serving areas): Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Also includes some serving areas.

FOOD SERVING AREAS: Serving area application is limited to **BAIT STATION TREATMENT ONLY**. Application directions: 1. Open container and remove the bait trays. Fill trays with bait. 2. Place at least 6 trays in cabinets, behind equipment and other areas when roach, termite, and weevil activity is seen. 3. Use a minimum of 6 trays for each area measuring approximately 10 feet by 10 feet. 4. Replace all trays every three (3) to four (4) months to keep roach, termite, and weevil activity from reappearing.

NONFOOD AREAS (Including some serving areas) Includes garbage rooms, lavatories, floor drains (to sewer), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling). Also includes some **SERVING AREAS**. Following application directions given above.

NONFOOD SERVING AREAS: Serving areas are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered **NONFOOD AREAS** when food is not exposed and the facility is not in operation. Follow application directions given above.

7047

**DO NOT USE ANY OTHER PESTICIDE FOR ROACH, TERMITE, AND
WEEVIL CONTROL IN COMBINATION WITH OR
AFTER APPLICATION OF BUSHWHACKER® for 4 TO 6 MONTHS**

STORAGE AND DISPOSAL ---- **Storage:** Store in dry place. Do not store where children or animals may gain access. Keep lid tightly closed when not in use. **Pesticide Disposal:** Wastes resulting from use of this product may be disposed of on-site or at an approved waste disposal facility. **Container Disposal:** Do not reuse empty container. Puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY LIMITATIONS AND DISCLAIMER: Bethurum Research and Development, Inc. warrants that this product conforms to the chemical description on the label when used in strict accordance with the directions therein under normal conditions of use. THIS IS THE ONLY WARRANTY MADE ON THIS PRODUCT. NO OTHER EXPRESS AND IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE IS MADE OUTSIDE OF THIS LABEL. Therefore, neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), under abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes, etc.) or under conditions not reasonably foreseeable to or beyond the control of seller. When buyer or user suffers losses or damages resulting from the use or handling of the product (including claims based on contract, negligence, strict liability, or other legal theories), buyer or user must promptly notify in writing Bethurum Research and Development, Inc. of any claims to be eligible to receive either remedy given below. The EXCLUSIVE REMEDY OF THE BUYER OR USER and the LIMIT OF LIABILITY of Bethurum Research and Development, Inc. or any other seller will be one of the following, at the election of Bethurum Research and Development, Inc. (1) Refund of purchase price paid by buyer or user for product bought, or (2) replacement of amount of product used. The seller will not be liable for consequential or incidental damages or losses. The terms of this Warranty Limitations and Disclaimer cannot be varied by any written or verbal statements or agreements. Any employee or sales agent of the seller is not authorized to vary or exceed the terms of this Warranty Limitations and Disclaimer in any manner. U. S. Patent Pending BRD 0893

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