

62719-47

3-26-2001

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060. Approval expires 05-31-98



United States
Environmental Protection Agency
Washington, DC 20460

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

OPP Identifier Number
257206

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-47	2. EPA Product Manager Meredith Laws	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/Dursban* TC	PM# 19	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <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: NOTIFICATION EPA Reg. No. MAR 26 2001 Product Name	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels 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.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
Under Preconstruction Subterranean Termite Treatment, added language, as required by the state of Florida, to the paragraph that defines preconstruction applications.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) 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 checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled	<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point /Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name John J. Jachetta, Ph.D.	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4686
2. Signature <i>John J. Jachetta</i>		3. Title Regulatory Manager
4. Typed Name John J. Jachetta, Ph.D.		5. Date March 12, 2001
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 knowing false or misleading statement may be punishable by fine or imprisonment of both under applicable law.		Date Application Received (Stamped)

Supplemental Labeling

NOTIFICATION

MAR 26 2001



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Dursban* TC

EPA Reg. No. 62719-47

Use of Dursban TC as a Preconstruction and Postconstruction Termiticide Application at 0.5% Active Ingredient Concentration

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in possession of the user at the time of pesticide application.
- Read the label affixed to the container for Dursban* TC termiticide before applying. Carefully follow all precautionary statements and applicable Directions for Use.
- Use of Dursban TC according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the product container.

Directions for Use

Preconstruction Subterranean Termite Treatment

Preconstruction applications are defined as those applications made prior to the finished grade being installed. Effective Preconstruction treatment for subterranean termite prevention requires the establishment of vertical and/or horizontal chemical barriers between wood in the structure and the termite colonies in the soil. Follow state and local regulations to meet minimum treatment standards for preventive Preconstruction treatments. IN FLORIDA: The vertical barrier application is required to complete the preconstruction application. After completion, a consumer notice must be posted in an accessible location on or in the structure that informs the consumer that the soil under and around the structure has been treated for the prevention of termites and contains the following information: date of application, identity of treatment provider, and the need for annual inspection and renewal of treatment contract.

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

See "Rate Determination Guidelines" and "Table 1" in main product label for dilution directions.

1. For **horizontal barriers**, applications shall be made using a low pressure spray (not to exceed 50 psi when measured at the treating tool to minimize exposure and potential for drift) after grading is completed and prior to the pouring of the slab or footing.
 - a. For a 0.5% rate, apply 1 gallon of dilution per 10 square feet or use 1 1/3 fluid ounces of Dursban TC per 10 square feet in sufficient water (not less than 1/2 or more than 2 gallons) to provide thorough and continuous coverage of the area being treated (see Application Volume section in main product label).

If the fill is washed gravel or other coarse material, it is important that a sufficient amount of dilution be used to reach the soil substrate beneath the coarse fill.

- b. If concrete slabs cannot be poured over the soil the same day it has been treated, a vapor barrier should be placed over the treated soil to prevent disturbance of the termiticide barrier.
2. For **vertical barriers**, apply the 0.5% dilution at a rate of 4 gallons per 10 linear feet per foot of depth. Establish vertical barriers in areas such as around foundations, plumbing lines, backfilled soil against foundation walls and other areas that may warrant more than just a horizontal barrier.
- a. When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.
 - b. Trenches need not be wider than 6 inches. Treat soil with the dilution as it is being replaced in the trench.

For a 0.5% rate, apply 4 gallons of dilution per 10 linear feet per foot of depth or 5 1/3 fluid ounces of Dursban TC per 10 linear feet per foot of depth from grade to top of footing in sufficient water (not less than 2 gallons or more than 8 gallons) to ensure complete coverage.
 - c. Hollow block foundations or voids of masonry can be treated to make a complete chemical barrier especially if the soil was not treated prior to pouring the footing. Apply the dilution at a rate of 2 gallons per 10 linear feet so that it reaches the top of the footing.
 - d. For crawl spaces, establish a vertical barrier on both sides of the foundation and around all piers and areas where underground utilities exit the soil. Do not apply the dilution to the entire surface area intended as the crawl.
3. For **plenum type structures** which use a sealed underfloor space to circulate heated and/or cooled air throughout the structure. Apply the dilution at the rate of 4 gallons per 10 linear feet per foot of depth. Soil adjacent to both sides of foundation walls, supporting piers, plumbing and conduits should be treated by trenching or rodding (where soil conditions permit) to a depth of 6 inches or, if less shallow, to the top of the footing. When conditions will not permit trenching or rodding, surface application adjacent to interior foundation walls may be made but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation walls, piers or pipes. The surface application should be made at a rate of 1 gallon per 10 square feet as a very coarse spray under low pressure (not to exceed 20 psi. when measured at the treating tool). After soil treatment, a continuous vapor barrier of at least 6 mil polyethylene film or other suitable vapor barrier must be installed on the ground surface over the entire subfloor area and on the inside of the plenum walls, in accordance with the recommended practices for plenum type structures.

Postconstruction Treatments

Postconstruction applications are defined as those applications made after the final grade is installed.

See "Rate Determination Guidelines" and "Table 1" for in main product label for dilution directions.

Precaution: Do not apply dilution until location of heat or air conditioning ducts, vents, water and sewer lines and electrical conduits are known and identified. Extreme caution must be taken to avoid contamination of these structural elements and airways.

All holes in commonly occupied areas into which material has been applied must be plugged. Plugs should be of a non-cellulose material or covered by an impervious, non-cellulose material.

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1. For **slab-on-ground construction** applications may be made using techniques such as sub-slab injection, rodding and/or trenching. Injectors should not extend beyond the tops of the footings.

- a. Treat along the outside of the foundation to form a continuous termiticide barrier in the soil.

For shallow foundations, 1 foot or less, dig a narrow trench approximately 6 inches wide along the outside of the foundation walls. Do not dig below the bottom of the footings. For foundations with exposed footings, dig a trench alongside the footing taking care not to undermine the footing. The dilution should be applied to the trench and mixed with the soil as it is replaced in the trench.

For a 0.5% rate, apply 4 gallons of dilution per 10 linear feet or use 5 1/3 fluid ounces of Dursban TC per 10 linear feet in sufficient water (no less than 2 gallons or more than 8 gallons) to provide thorough and complete coverage of the area being treated (see "Application Volume" section in main product label).

For foundations with footings deeper than 1 foot, apply the dilution at a rate of 4 gallons per 10 linear feet per foot of depth. For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements at the rate prescribed from grade to the top of the footing. When the footing is more than 4 feet below grade, the applicator must trench and rod into the trench or trench along the foundation wall at the rate prescribed to a minimum depth of 4 feet. The actual depth of treatment will vary depending on soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

- b. When treating cracks and expansion joints in the slab, along sidewalks or patios adjacent to the exterior foundation wall or other areas where holes are to be drilled to form a continuous termiticide barrier, the holes should be spaced at intervals up to 24 inches depending on soil type.

Hard, dry soils typically allow good lateral (horizontal) dispersion. However, they may be slow in absorption or downward movement. Care must be taken when injecting through slabs into areas with this type of soil. Low pressures should be considered in this situation. This will help to avoid backsplashing from the injection hole, backflow from cracks and expansion joints, and unwanted emergence of the termiticide dilution from adjacent drill holes. A slow, low pressure application using the proper volume of termiticide dilution will allow the soil to absorb the liquid and provide an adequate vertical barrier. The wider drill hole spacings (18 to 24 inches) can usually be used in this situation. Sand, loam, or gravel backfill materials are commonly found under slab foundations. The type of fill, amount of settling that has occurred, moisture content, etc., will determine drill hole spacing and amount of termiticide dilution to be injected through each hole. Highly absorptive soils or those with large pore spaces (gravel, coarse sand) will afford rapid downward (vertical) movement and limited lateral (horizontal) distribution of the termiticide dilution. In this situation, consider using a lateral dispersion tip on the sub-slab injector and place the drill holes closer together (12 to 18 inches).

For a 0.5% rate, apply 4 gallons of dilution per 10 linear feet.

- c. It may be necessary to treat along one side of interior partition walls if there are cracks in the slab, plumbing entry points, existing termite infestations, or other conditions which would make treatment appropriate.
- d. To complete the termiticide barrier under slab foundations, it may be necessary to drill and treat near plumbing and electrical entry areas, cracks, or other areas where termites might enter the structure. In this instance, one or more holes should be drilled in the slab as close to the entry point as is practical and termiticide placed in the fill. As a general rule, 3 to 5 gallons of dilution per entry point will usually give adequate coverage, however, the use of directional or lateral dispersion tips or foam delivery systems can give adequate coverage

with lower volumes. Location of the drill hole in relation to the entry point, type of soil fill, presence or absence of a vapor barrier, application pressure and other considerations will affect the coverage and volume of termiticide needed to form a complete barrier. Precautions must be taken to avoid drilling into plumbing or electrical conduit.

- e. When necessary, drill through the foundation walls from the outside and force the dilution just beneath the slab either along the inside of the foundation or along all the cracks and expansion joints and other critical areas.
- f. **Bath traps:** Exposed soil or soil covered with tar or a similar type sealant beneath and around plumbing and/or drain pipe entry areas may be treated with a 0.5% dilution of Dursban TC.

An access door or inspection vent should be cut and installed, if not already present. After inspection and removal of any wood or cellulose debris, the soil can be treated by rodding or drenching the soil. A one square foot bath trap will usually require about 3 to 5 gallons of dilution for thorough and complete coverage.

- 2. **Hollow block foundations or voids in masonry** resting on the footing can be treated to make a continuous chemical barrier in the voids. If the void has direct contact with the soil, it should be treated. Drill and treat all voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of emulsion per 10 linear feet of footing using a nozzle pressure of less than 25 psi. When using this treatment, access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

Not for use in voids insulated with rigid foam.

- 3. For **basements**, apply at a rate of 4 gallons of dilution per 10 linear feet per foot of depth. Where footings are greater than 1 foot of depth from the grade to the top of the footing, application may be made by trenching and/or rodding at a rate of 4 gallons of dilution per 10 linear feet per foot of depth. When the footing is more than 4 feet below grade, the applicator must trench and rod into the trench or trench along the foundation wall at the rate prescribed to a minimum depth of 4 feet. The actual depth of treatment will vary depending on soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Treat outside of foundation walls, and if necessary beneath the basement floor along inside of foundation walls, along cracks in basement floors, along interior load bearing walls, around sewer pipes, conduits and piers.

- 4. **Accessible Crawl Spaces:** For crawl spaces, apply vertical termiticide barriers at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth from grade to top of footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet.

For a 0.5% rate, apply 4 gallons of dilution per 10 linear feet per foot of depth or 5 1/3 fluid ounces of Dursban TC per 10 linear feet per foot of depth from grade to top of footing in sufficient water (not less than 2 gallons or more than 8 gallons) to ensure complete coverage.

Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions, such as concrete walkways adjacent to foundation elements, prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

- a. Rod holes and trenches shall not extend below the bottom of the footing.

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- b. Rod holes shall be spaced so as to achieve a continuous chemical barrier but in no case more than 12 inches apart.
 - c. Trenches shall be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench shall be stepped to ensure adequate distribution and to prevent termiticide from running off. The emulsion must be mixed with the soil as it is replaced in the trench.
 - d. When treating crawl spaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.
5. **Inaccessible Crawl Spaces:** For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one or a combination of the following two methods.

For a 0.5% rate, apply 4 gallons of dilution per 10 linear feet or 5 1/3 fluid ounces of Dursban TC per 10 linear feet in sufficient water (not less than 2 gallons or more than 8 gallons) to ensure complete coverage (see Application Volume section in main product label).

- a. To establish a horizontal barrier, apply 1 gallon of emulsion per 10 sq ft to the soil surface. Use a nozzle pressure of less than 25 psi and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or powerspray with higher pressures.
- b. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of emulsion per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals so check state regulations that may apply.

When treating crawl spaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

In the presence of unsupported termite tubes, mechanically destroy each tube and apply approximately 1 pint of 0.5% dilution to an area of no more than 18 inches in diameter where the tubes emerged from the soil.

6. In **plenum type structures**, which use a sealed underfloor space to circulate heated and/or cooled air within the structure, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil. Apply the 0.5% dilution at the rate of 4 gallons per 10 linear feet per foot of depth. Soil adjacent to both sides of foundation walls, supporting piers, plumbing and conduits should be treated by trenching or rodding (where soil conditions permit) to a depth of 6 inches or to the top of the footing. When conditions will not permit trenching or rodding, a surface application adjacent to interior foundation walls may be made, but the treated strip shall not exceed a width of 18 inches, horizontally, from the foundation piers or pipes. Surface application is made at a rate of 1 gallon per 10 square feet as a very coarse spray under low pressure (not to exceed 20 psi. when measured at the treating tool). In order to properly calculate the amount of termiticide dilution needed, use the following guideline: A strip 18 inches wide and 6 feet 8 inches long is equal to 10 square feet. Before treatment, a barrier of at least 6 mil polyethylene film or other suitable vapor barrier must be present on this ground surface over the entire subfloor area in accordance with recommended practices for plenum type structures. Install a new vapor barrier if barrier is absent or deteriorated. The vapor barrier film on the ground and foundation walls must be folded back from the areas to be treated prior to treatment and replaced immediately following treatment. Structures should be ventilated during application and until treatment is dry.
7. **Application using foam-generating equipment:** The emulsion may be converted to a foam and the foam used to control or prevent termite infestations.

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Depending on circumstances, foam applications may be used alone or in combination with liquid emulsion applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, under slabs, stoops, porches, or to the soil in crawl spaces, and other similar voids.

Foam and liquid application must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 50 to 75% of the labeled liquid emulsion volume of product must be applied, with the remaining percent delivered to appropriate areas using foam application. Refer to the label and use recommendations of the foam manufacturer and the foaming equipment manufacturer for adjuvant rates to produce the needed expansion ratio with this product.

Foam applications are generally a good supplement to liquid treatments in difficult areas, but may be used alone in difficult spots.

The following provides the amount of Dursban TC required for a given area and volume range of the prefoamed termiticide dilution necessary for application of the product.

For a 0.5% rate, apply 5 1/3 fluid ounces of Dursban TC per 10 linear feet using no less than 2 gallons, or more than 8 gallons, of prefoamed dilution.

- 8. Application in conjunction with the use of the Sentricon[®] Colony Elimination System: As a part of the integrated pest management (IPM) program for subterranean termite control, Dursban TC may be applied to critical areas of the structure including plumbing and utility entry sites, bath traps, expansion joints, foundation cracks, and areas with known or suspected infestations at a rate of 0.5% as a spot application or complete barrier treatment. Application may be made as described in the Postconstruction Treatment section of this label.

*Trademark of Dow AgroSciences LLC

D06-021-XXX
EPA-accepted: 03/04/99
Replaces D06-021-001.

Revision: By Notification, added language, as required by the state of Florida, to the paragraph that defines preconstruction applications under the Preconstruction Subterranean Termite Treatment section.