

62719-270

10/17/2003

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

OCT 17 2003

A. Sterett Robertson  
Dow AgroSciences  
9330 Zionsville Road  
Indianapolis, IN 46268

Dear Mr. Robertson:

Subject: Recruit AG  
EPA Reg. No. 62719-270  
Submission dated 2/25/03

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

Based on the data cited at the time of registration, this pesticide product is Toxicity Category III for dermal toxicity and eye irritation. You have not cited or submitted data to show Recruit AG is Toxicity Category IV. Further, while the product formulation is similar to Recruit II, Recruit II is a bait station used in ground and Recruit AG is used above ground with a somewhat greater exposure potential. For these reasons, the appropriate Precautionary Statements and First Aid statements must read as follows:

**Precautionary Statements**

Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling bait or bait station.

**First Aid**

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes: 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 eye. 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.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



*for* Linda Arrington  
Acting Product Manager 10  
Insecticide Branch  
Registration Division (7505C)

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(Base Label):

**Recruit AG termite bait is sold in conjunction with a service provided by a pest control operator licensed by the state to apply termiticides.**

(Logo) Dow AgroSciences

# Recruit\* AG

**A termite bait for use as an above ground delivery system for elimination of subterranean termite colonies.**

Active Ingredient:	
hexaflumuron .....	0.5%
Inert Ingredients .....	99.5%
Total .....	100.0%

U.S. Patent 4,468,405

**Keep Contents Out of Reach of Children**

## CAUTION

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

**OCT 17 2003**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
62719-270

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### Precautionary Statements

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#### Hazards to Humans and Domestic Animals

**Do not tamper with bait material.**

#### Environmental Hazards

This product is highly toxic to aquatic invertebrates and possibly to fish. Do not use this product in depressions, low areas, near ponds, streams, springs, other water sources, or near downspout openings when the bait or its hexaflumuron contents could be washed out of the bait station into water at or near the surface of the ground.

**Refer to label booklet for Directions for Use.**

**Notice:** Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies at end of label booklet.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at [www.dowagro.com](http://www.dowagro.com).

EPA Reg. No. 62719-270

EPA Est. 00000-XX-00

\*Trademark of Dow AgroSciences LLC  
Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

## Termite Bait

**Net Weight 2.4 oz Min.**

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(Datapack cover):

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### CAUTION

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### Termite Bait

**Net Weight 2.4 oz Min.**

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(Page 1 through end):

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**Precautionary Statements**

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This product is highly toxic to aquatic invertebrates and possibly to fish. Do not use this product in depressions, low areas, near ponds, streams, springs, other water sources, or near downspout openings when the bait or its hexaflumuron contents could be washed out of the bait station into water at or near the surface of the ground.

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**Directions for Use**

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

**Storage and Disposal**

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

**Storage:** Store in original container in a dry storage area.

**Disposal:** Store used stations that are damaged or no longer needed until they can be sent to an approved facility per instructions by Dow AgroSciences for disposal or recycling.

**Handling Procedures:** Do not remove station from its protective wrapper or expose the bait until ready to use.

**General Information**

Recruit\* AG termite bait is an above ground station of the Sentricon\* *Termite Colony Elimination System* and may be used to eliminate subterranean termite colonies. Recruit\* AG contains the insect growth regulator (IGR), hexaflumuron, which prevents successful molting and development of subterranean termites. This disruption of development results in the decline and ultimate elimination of the termite colony when it can no longer sustain itself. Recruit AG may be used against all economically important species of termites, including *Coptotermes*, *Reticulitermes*, and *Heterotermes* spp. Target sites for use of this product include interior and exterior surfaces of buildings and crawl spaces, fences, utility poles, decking, landscape decorations, trees, or other features that could be damaged by termite foraging and feeding activity.

A thorough understanding of the biology and behavior of subterranean termites relative to building construction and landscape features is essential for effective use of this product.

Once installed, Recruit AG must remain in place as long as termites are actively feeding on the bait material. Recruit AG should be inspected regularly (at least at 2 to 4 week intervals depending upon feeding activity) to ensure that termites do not entirely consume the bait matrix. If one-third to one-half of the bait matrix has been consumed and active feeding continues, a supplemental station should be added by "stacking" it on top of the existing station. Stacking allows for addition of Recruit AG units without disturbing termite foraging within the previously installed station. Details of this process are provided in the "Installation of Supplemental Recruit AG" section of this label.

When feeding has not been observed for two consecutive monitoring periods, the Recruit AG station can

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be removed followed by periodic inspection of the structure for renewed termite activity.

Do not re-use Recruit AG. Subterranean termites excrete colony specific pheromones that become incorporated into the material during feeding and foraging. The pheromones deposited in the material by one colony will induce feeding deterrence or repellency in members of other colonies and thereby prevent feeding and toxicant delivery.

Recruit AG can be applied in conjunction with other termite control methods, including soil barrier treatments and monitoring/baiting of Recruit II in the Sentricon System stations used in ground. However, application of pesticides to Recruit AG or to the immediate area to which it is attached may repel termites and should be delayed until after the entire baiting process is complete.

**Food Handling Establishments:** Recruit AG may be installed in both food and nonfood areas of all types of food-handling establishments, i.e., food service, food processing and food manufacturing establishments. This includes, but is not limited to, restaurants, grocery stores, bakeries, bottling plants, canneries, meat and poultry processing plants, and grain mills.

### Inspection of Structures

Thorough inspection of the site to be protected is required to determine if subterranean termites are present and accessible. Treatment sites may include the interior and exterior surfaces of buildings and crawl spaces, fences, utility poles, decking, landscape decorations, trees, and other features that could be damaged by termite foraging and feeding activity.

Recruit AG is effective only when applied to areas where termites are active and direct access to the station is possible. Installation of Recruit AG does not attract termites. Areas suitable for placement of Recruit AG include interior and exterior surfaces where 1) live termites are visually observed in foraging tubes or subsurface galleries; 2) feeding activity is detected using an acoustic emission detector; or 3) termite foraging tubes, feeding damage, or emergence holes have recently appeared. The surface area for installation of Recruit AG should be large enough to allow the station to be firmly attached to the structure.

Once suitable areas for placement are identified, some surface preparation may be necessary before installation of Recruit AG. In areas where there are no obvious subsurface galleries, feeding damage, or emergence holes, but termite feeding activity is detected, holes approximately 3/8-inch in diameter may be drilled to intercept feeding galleries within the area to be covered by the bait station. Be careful not to scrape off or disturb surface foraging tubes during the drilling process.

### Installation of Recruit AG

The Recruit AG station consists of a rigid plastic housing containing the bait matrix. A removable cover allows for internal inspection of the bait station after installation (see Figure 1). When attached to the mounting surface, the access window (open side) of the bait station allows termites direct access to the bait. Mounting surfaces surrounding the access window contain breakout points that can be removed to prevent damage to surface foraging mud tubes or allow better contact with the mounting surface.

#### Installation:

1. Make sure the surface to which the station will be attached is clean and dry.
2. Always moisten the bait matrix before securing the station in place since it is more difficult to moisten the bait matrix once it is attached. With the cover removed, carefully add 1-2 fl. oz. (30-60 ml.) of water or a sugar containing solution such as a sports performance drink to both of the exposed surfaces of the matrix slowly enough that it is absorbed completely with no spillage or runoff.

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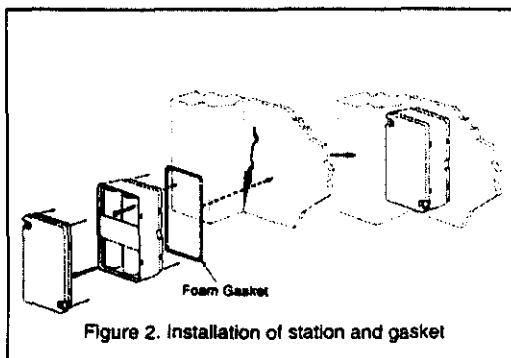
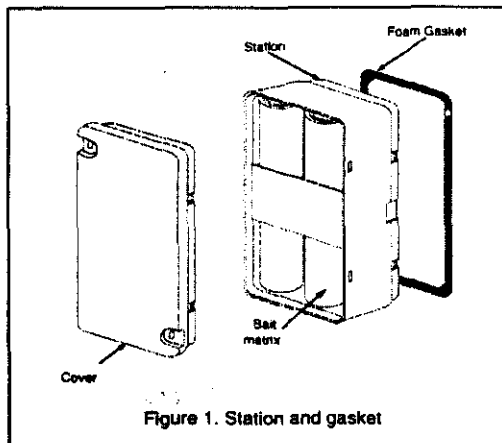
3. Align the access window of the station housing with the termite gallery openings, exit holes, drilled holes, or mud foraging tubes and secure the station to the surface (see Figure 2).

**Note:** When mounting the bait station on structures containing surface foraging mud tubes, a segment of each tube within the area to be covered by access window should be removed. This allows termites direct access to the bait. Avoid crushing surface foraging mud tubes when installing the bait station. Crushing these tubes will deny termites access to the bait. Appropriate use of breakout points where surface foraging mud tubes intersect the edges of the station housing will allow secure attachment without crushing the tubes.

4. Firm and secure attachment of the station housing to the structure is necessary for it to remain in place under adverse weather conditions and to prevent tampering. Suitable attachment materials include screws, tape, non-volatile adhesives, latex-based caulk, or other appropriate materials. (**Note:** Avoid use of adhesives or caulking materials with volatile solvents that can temporarily repel termites.) Apply adhesive caulking material to the surfaces of the station housing which contact the mounting surface, but do so only after the final mounting position has been determined and, if necessary, breakout points have been removed. If adhesive is not desired, a foam gasket is included. Place the gasket between the mounting surface of the station and the termite infested structure. Align the holes in the gasket with the screw holes in the station and attach station to termite infested surface. The method of attachment should not interfere with removing the cover to inspect the bait or add a supplementary station.

Termites may abandon a station that allows light, air movement, drying of the matrix, or invasion by ants or other predators inside. Proper attachment and sealing of the station housing to the structure is critical.

5. After attachment of the station, replace and secure the cover.



## Inspection of Recruit AG

To inspect Recruit AG, remove the cover to expose the bait matrix. If termites are active in the station and the matrix appears to be at least 1/3 to 1/2 consumed, a supplemental station should be added. If the bait matrix is moldy or degraded, it should be removed and replaced with a new station. If the bait matrix has dried out and contains no termites, it may be remoistened by adding 1-2 fl. Oz. (30-60 ml.) of water. Recruit AG must be inspected at least at 2 to 4 week intervals while termites are actively feeding in order to maintain Recruit AG as a constant source of food. It is undesirable for the entire contents of the station to be consumed before replenishment because termites may begin to forage elsewhere for food and water. Inspect for secure attachment of the bait station to the surface of the structure and reinforce if necessary.

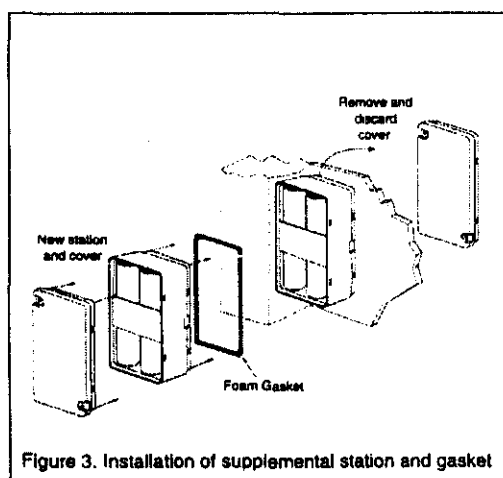
## Installation of Supplemental Recruit AG Stations

Recruit AG stations are designed to accommodate the addition of a supplemental station by "stacking" a new station on top of an existing one. Stacking allows uninterrupted feeding without disturbing the termites in the original station. Moisture should be added to the supplemental station before installation as described in the "Installation of Recruit AG" section of this label. Gaskets, which may be used for mounting the original stations, should not be used between stacked stations.

- Recruit AG Station (see Figure 3) -- Remove the cover from the existing station. Snap the new station and cover into place on top of the existing station.

Up to two stations (original plus 1) may be stacked at one location. Stacking of more than two stations is unnecessary and is undesirable for aesthetic and practical reasons. If it is necessary to continue baiting after two stations have been stacked, remove the second station, leaving the original station in place and add the new station on top of it. This procedure will ensure that foraging termites are minimally disturbed and that colony specific pheromones will remain at the site.

Inspect supplemental stations regularly as described in the "Inspection of Recruit AG" section of this label.




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## Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. Dow AgroSciences MAKES NO OTHER EXPRESS OR



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IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

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**Inherent Risks of Use**

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It is impossible to eliminate all risks associated with use of this product. Lack of performance or other unintended consequences may result because of such factors as use of the product contrary to the label instructions (including adverse conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, etc.), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences and its agents. All such risks shall be assumed by the user.

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**Limitation of Remedies**

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The exclusive remedy for losses or damages resulting from the use of this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Dow AgroSciences' election, one of the following:

1. Refund of any fee paid to Dow AgroSciences by the user in relation to use of the product at a particular site, or
2. Replacement of the amount of product used at a particular site.

Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. In no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

Except as is specifically authorized in this Limitation of Remedies section of this label, the terms of the Warranty Disclaimer and Inherent Risks of Use above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

\*Trademark of Dow AgroSciences LLC

EPA-Accepted: \_\_/\_\_/\_\_