

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

81110

62719-272

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8 MAR 1996

Kenneth D. Racke, Ph.D.
 Product Registration Manager
 DowElanco
 9330 Zionsville Road
 Indianapolis, IN 46268

Dear Dr. Racke:

Subject: Recruit II
 EPA Registration No. 62719-272
 Your letter dated February 22, 1996

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. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

On page 7, delete the reference to EPA acceptance of the label.

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

Sincerely,

RPK

Richard P. Keigwin, Jr.
 Product Manager 10
 Insecticide & Rodenticide Branch
 Registration Division (7505C)

CONCURRENCES

SYMBOL ▶	7F05C							
SURNAME ▶	<i>Ann Sibold</i>							
DATE ▶	Mar 5, 1996							

J1A/NAF-165/Amend/02-19-96

file: n272f96d.doc

Recruit* II

(NAF-165)

EPA Reg. No. 62719-272

Registration Notes

Proposed Label Amendment: Current label text based on EPA-accepted copy dated November 24, 1995, for NAF-165.

Proposed Label Amendment:

1. Request to change the EPA-registered name for NAF-165 to Recruit* II.

[Editor's note: Added text is underlined and deleted text is denoted by strike-through.]

*Trademark of DowElanco

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file: n272f96d.doc

Registration Notes for Previous Labeling Actions:

Recruit* II

(NAF-165)

EPA Reg. No. 62719-272

Final Printed Labeling (Recruit II): Label text based on EPA-accepted copy dated November 24, 1995.

Label Change(s) by Notification (02/19/96): Recruit II as an alternate brand name for NAF-165.

Final Printed Labeling (NAF-165): Label text based on EPA-accepted copy dated November 24, 1995.

Proposed Labeling for Section 3 Registration: New product containing 0.5% hexaflumuron submitted to EPA in June 8, 1995. Label text based on EPA-accepted copy for Recruit* (62719-243) dated March 15, 1995.

*Trademark of DowElanco

[Editor's note: Added text is underlined and deleted text is denoted by strike-through.]

(Base Label)

(Logo) DowElanco

NAF-165 Recruit* II

A termite bait for use in an integrated management system for protection of structures from subterranean termites.

Active Ingredient:

hexaflumuron: N(((3,5-dichloro-4-(1,1,2,2-tetrafluoroethoxy)phenyl)amino)carbonyl)-2,6-difluorobenzamide 0.5%

Inert Ingredients 99.5%

Total 100.0%

Contains 0.5 grams of hexaflumuron per 100 grams of formulation.

U.S. Patent No. 4,468,405

ACCEPTED
with COMMENTS
In EPA Letter Dated

8 MAR 1996

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this product is registered under EPA Reg. No.

62719-272

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out Of Reach Of Children

CAUTION

Do not tamper with bait material.

Environmental Hazards

This product is highly toxic to aquatic invertebrates and possibly to fish. Do not use Baitube* devices 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 Baitube into water at or near the surface of the ground.

Directions for Use

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 using.

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 Baitube devices that are damaged or no longer needed until they can be collected by a representative of DowElanco for disposal or recycling.

Refer to label booklet for additional precautionary information and Directions for Use.

Notice: Read the entire label. Use only according to label directions. **Before buying or using this product, read "Warranty Disclaimer" and "Limitation of Remedies" sections inside of label booklet.**

In case of emergency endangering health or the environment involving this product, call collect 517-636-4400.

EPA Reg. No. 62719-272

EPA Est. 37429-GA-2

DowElanco • Indianapolis IN 46268-1053 U.S.A.

Termite Bait

24 Count

5 7/12

(Label Booklet)

(Logo) DowElanco

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DowElanco • Indianapolis, IN 46268-1053 U.S.A.

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Directions for Use

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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 Baitube devices that are damaged or no longer until they can be collected by a representative of DowElanco for disposal or recycling.

Handling Procedures

Do not break open or cut into the Baitube. Do not remove protective wrapper from the Baitube until ready for use.

General Information

NAF-165 Recruit II termite bait contains an insect growth regulator (IGR), hexaflumuron, that prevents successful molting and development of subterranean termites. This disruption of development ultimately results in the decline of the termite colony to the point where the colony can no longer sustain itself and is eliminated.

NAF-165 Recruit II was developed to be used in the Sentricon* System which represents an integrated pest management approach for the elimination of subterranean termite colonies, including *Coptotermes*, *Reticulitermes*, and *Heterotermes spp.* and is intended to form the basis of an on-going program providing structural protection from subterranean termites. Use of this management system involves three basic steps: (1) monitoring for the presence of termite activity in and around the target site; (2) delivery of a slow acting insect growth regulator such as NAF-165 Recruit II when the presence of subterranean termites has been detected; and (3) continued inspection and monitoring of the site for the presence of termite activity after control of the colony has been achieved. Although the third phase of the management system is an optional service offered to the owner of the structure, it can provide an on-going preventive service in order to detect any new termite activity.

When termite activity is detected and feeding of NAF-165 Recruit II termite bait is established, Baitube devices must remain in the station as long as the bait material is being consumed and termites remain active. When evidence of termite activity in the Baitube ceases, resume monitoring to detect the presence of renewed termite activity by substituting a monitoring device for the Baitube if the termite control program is on-going.

Do not re-use Baitube devices or NAF-165 Recruit II termite bait. Subterranean termites excrete colony specific pheromones that become incorporated into the bait while feeding and foraging. The pheromones

left in the bait by one colony will cause feeding deterrence or repellency to other colonies, causing it to be ineffective.

It is important for operators to understand the biology and behavior of subterranean termite species, and construction and landscape features conducive to infestation by subterranean termites.

Use Directions

Target sites for this system can include buildings, fences, utility poles, decking, landscape plantings and trees or other features which could be damaged by termite feeding and foraging activity. NAF-165 Recruit II can be used on the inside or outside of foundation walls of crawl space areas or through concrete and asphalt if adequate soil is determined inaccessible and such action is warranted.

Monitoring

The purpose of the monitoring phase is to detect the presence of subterranean termites. This procedure does not attract termites from other locations. When present, termites can be collected from monitoring devices placed in the soil or Sentricon stations. Upon collection, these termites can be placed inside the Baitube containing NAF-165 Recruit II to force tunneling through the bait material. This facilitates their return to the colony for "recruiting" other nestmates to feed on NAF-165 Recruit II. This Self-Recruitment procedure further encourages the subterranean termite population to forage into and feed on NAF-165 Recruit II.

Identify critical areas suitable for placing monitoring devices. Critical areas include locations within or adjacent to visible termite activity such as indicated by: foraging tubes, termite infested plants, wood, and other materials; and areas conducive to termite foraging (bath traps, moist soil in shaded areas, near irrigation sprinkler heads, roof down spouts and other moist areas, and near planting beds or other areas with plant root systems). In addition to select critical areas, install additional monitoring devices around the target site at intervals which do not exceed 20 feet where soil access is not restricted.

Inspect monitoring devices monthly for the first three months after installation at a site when termites are known to be active. If no termite activity at a site is documented, then monitoring can be done on a bi-monthly or quarterly basis.

When termite activity is observed in a monitoring device, initiate baiting when worker numbers are sufficient for Self-Recruitment and resume monitoring on a monthly basis. Continue monthly monitoring for as long as there is evidence of termite activity in any Sentricon station at the site. Once active termites are no longer found in any Baitube, or NAF-165 Recruit II is no longer being consumed for two consecutive monitoring periods, replace the Baitube with a monitoring device and resume monitoring on a bi-monthly or quarterly basis if the control program is continuing.

Note: Unfavorable conditions such as excessive moisture or freezing of soil may temporarily disrupt feeding on NAF-165 Recruit II and monitoring devices. Resume monitoring after return of conditions favorable to termite activity.

Delivery of NAF-165 Recruit II Termite Bait

Proper use of the Baitube containing NAF-165 Recruit II termite bait maximizes "recruitment" of nestmates and exposure of a large number of termites from a target colony to the IGR containing material.

1. Installation of the Baitube containing NAF-165 Recruit II: When termites are present during inspection of a monitoring device in numbers sufficient for Self-Recruitment, remove the monitoring device and replace it with a Baitube.

A Baitube is to be placed where an infested monitoring device has been removed. The empty chamber at the open end (top) of the Baitube provides a space for introduction of termites collected from the monitoring device. Follow the instructions under Self-Recruitment Procedure section then replace the cap after termites are introduced into the Baitube.

Self-Recruitment Procedure: Remove termites from the monitoring device and introduce them into the chamber in the top of the Baitube as follows (refer to Figure 1).

- (1) Remove monitoring device from the station. Place in a flat, smooth sided pan to contain the termites. Carefully clean off debris, soil and mud tube material from the surface of the monitoring device into the collecting pan. The debris collected can be placed in and around the baiting site to entice termites to feed at this foraging location.
- (2) Separate the monitoring device halves and gently tap them to dislodge as many termites as possible into the collecting pan.
- (3) Remove the cap from the Baitube.
- (4) Remove the paper insert which maintains the recruitment chamber during shipping and handling. The paper insert may be used to add a measured amount of water to the Baitube in order to help the termites survive during the initial Self-Recruitment procedure. In arid conditions or in dry soils it may be helpful to add about 15 ml of water (2/3 of the paper cup insert) to the recruitment chamber prior to adding the termites. Let the water soak completely into the material before adding the termites.
- (5) Add termites into the recruitment chamber.
- (6) Replace the cap on the Baitube without harming termites placed in the chamber. If the chamber is overfilled, wait for excess termites to crawl out of the open end of the tube to avoid injuring them when replacing the cap. Dead termites may repel nestmates from feeding at the bait station.
- (7) Prior to placement of the Baitube, peel off the outer covering at the perforations to expose the termite access holes. After the capped Baitube has been placed in the Sentricon Station, replace the top cap of the station.

Figure 1. (Refer to Self-Recruitment Procedure section)

1a. When termites are present during an inspection of the monitoring device in numbers sufficient for Self-Recruitment, remove the monitoring device and replace it with a Baitube containing NAF-165-Recruit II.

(Insert Graphic)

9 7 12

1b. Remove termites from the monitoring device into the collecting pan and introduce them into the top of the Baitube.

(Insert Graphic)

2. **Inspection of the Baitube:** Baitube devices are inspected by visually examining the device for termites. If termites are active in the Baitube and the material is nearly or totally consumed (or if the material appears to be degraded or moldy), replace it with another Baitube containing ~~NAF-165 Recruit II~~. If possible, gently tap the termites from the used Baitube device into the replacement device using the Self-Recruitment procedure described above. It is not desirable to have the entire contents of the Baitube consumed before replacing it, as termites may forage elsewhere in search of food. Inspect adjacent monitoring device locations and initiate placement of Baitube devices in Sentricon stations when and where termites are found in monitoring devices.

Warranty Disclaimer

DowElanco 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. DowElanco MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

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, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by the buyer.

Limitation of Remedies

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 DowElanco's election, one of the following:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used

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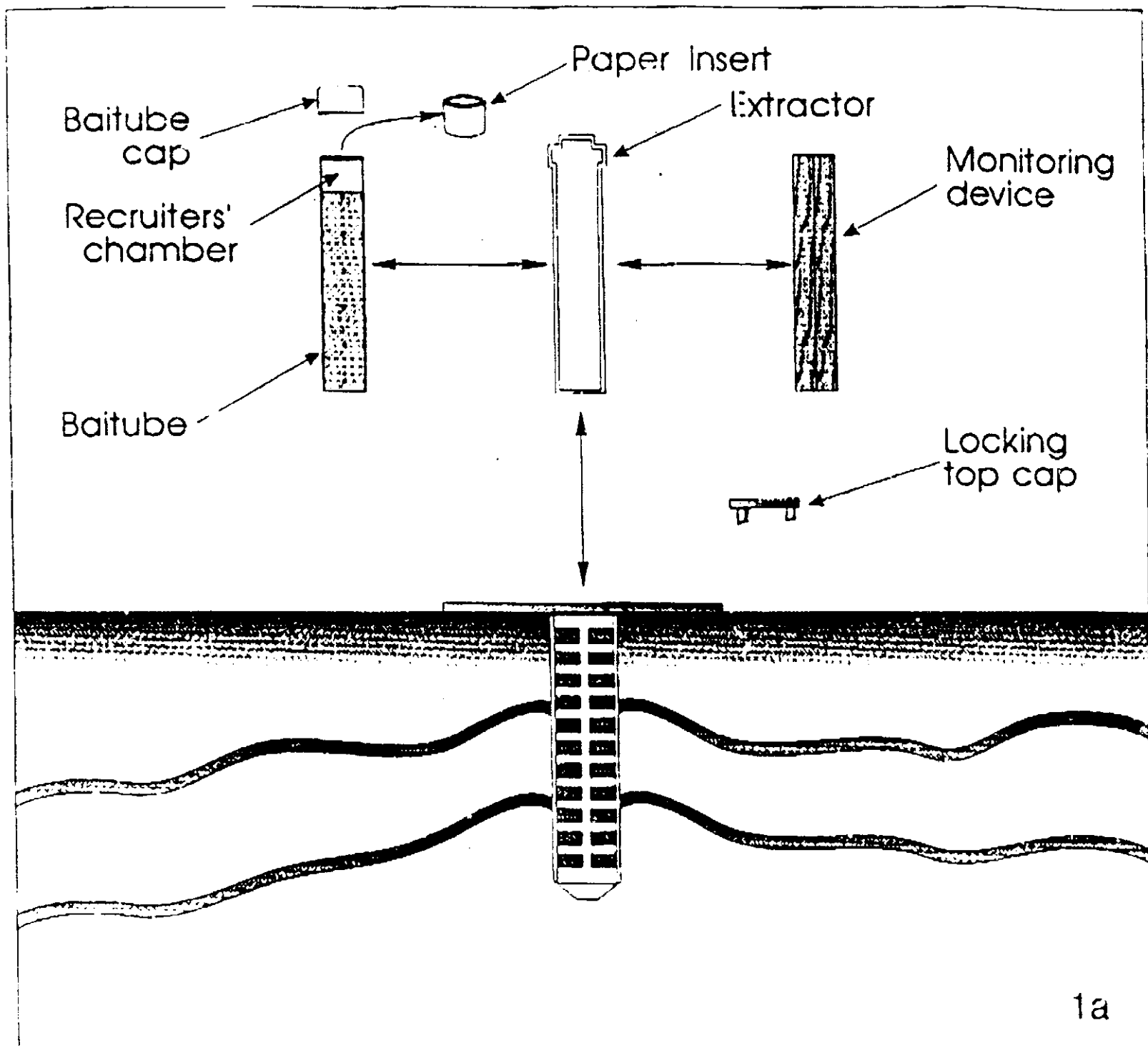
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DowElanco shall not be liable for losses or damages resulting from handling or use of this product unless DowElanco is promptly notified of such loss or damage in writing. In no case shall DowElanco be liable for incidental or consequential damages.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of DowElanco or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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EPA-accepted 11/24/95



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