

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

4/7/97

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
Amendment dated 11/22/96

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.

On page 7, you must use U.S. units of measure, followed by the metric equivalent.

On page 8, in the directions for installation of auxiliary stations, clarify that "baiting" means "baiting with Recruit II."

On page 9, delete the reference to plant injury from the inherent risks of use.

On page 9, delete "or" from item 2.

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

Sincerely,



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

CONCURRENCES

SYMBOL	7505C						
SURNAME	A. Sibold						
DATE	4/3/97						

Recruit* II

EPA Reg. No. 62719-272

Registration Notes:

Current label text based on EPA accepted copy dated March 9, 1996.

Proposed Label changes by Amendment:

1. Minor editing for clarity throughout label.
2. Revised Environmental Hazards section to clarify aquatic hazards.
3. Revised Use Directions to clarify instructions for monitoring, placement, and installation of baitube devices.
4. Revised Inherent Risk of Use and Limitation of Remedies sections in accordance with circumstances unique to the use of this product.

Note: Additional revisions were made to this amendment on November 20, 1996 per request of EPA.

*Trademark of DowElanco

3911

(Base label):

(logo) DowElanco

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

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

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" inside label booklet.**

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR - 7 1997

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

62717-272

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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-01

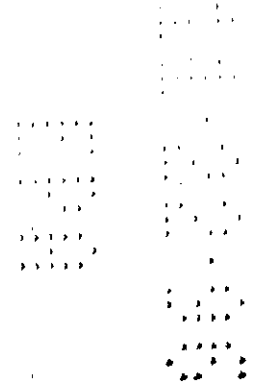
*Trademark of DowEianco
DowEianco • Indianapolis, IN 46268 U.S.A.

Termite Bait

24 Count

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(Datapack cover):

(logo) DowElanco

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(Page 1 through end):

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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 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 Baitube devices that are damaged or no longer needed until they can be collected by a representative of sent to an approved facility as instructed by 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

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.

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 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 elimination 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 provides an on going preventive service in order to detect any new termite activity.

When termite activity is detected and feeding of 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.

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Do not re-use Baitube devices or 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. 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~~ not accessible 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 of Sentricon stations. Upon collection, these termites can be placed inside the Baitube containing Recruit II to force tunneling through the bait material. This facilitates their return to the colony for "recruiting" other nestmates to feed on Recruit II. This "Self-Recruitment" procedure further encourages the subterranean termite population to forage into and feed on Recruit II termite bait.

Identify critical areas suitable for placing ~~monitoring devices~~ Sentricon stations. 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). Sentricon stations should be placed within 4 feet of critical areas unless placement is obstructed. Sentricon stations should not be placed in soil within 18 inches of structural foundations previously treated with a liquid termiticide. In addition to select critical areas, install ~~additional monitoring devices~~ Sentricon stations 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, and worker numbers are sufficient for Self-Recruitment (about 40 termites) then Baitube devices containing Recruit II and auxiliary Sentricon station(s) shall be installed per directions in section 2 of this label and monitoring resumed on at least a monthly basis. 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. If more than 75% of the Baitube device contents are consumed in one or more stations, stations should be inspected more frequently than monthly. Once active termites are no longer found in any Baitube, or 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. If auxiliary Sentricon stations have been installed they may be removed leaving the original Sentricon station in place.

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

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Delivery of Recruit II Termite Bait
Installation of the Baitube containing Recruit II

The monitoring device should be replaced with a Baitube containing Recruit II when termites are present in the monitoring device in numbers sufficient for Self-Recruitment (about 40 or more worker termites). Proper use of the Baitube containing Recruit II termite bait will maximize the "recruitment" of nestmates and expose a larger number of termites from a target colony to the IGR containing material. The Self-Recruitment procedure is accomplished by transferring termites collected from the monitoring device to the Self-Recruitment chamber at the top of the Baitube according to the following procedure:

1. Installation of the Baitube containing Recruit II: When termites are present during inspection of a monitoring device in numbers sufficient for Self-Recruitment (about 40 worker termites), 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 Self-Recruitment 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 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.

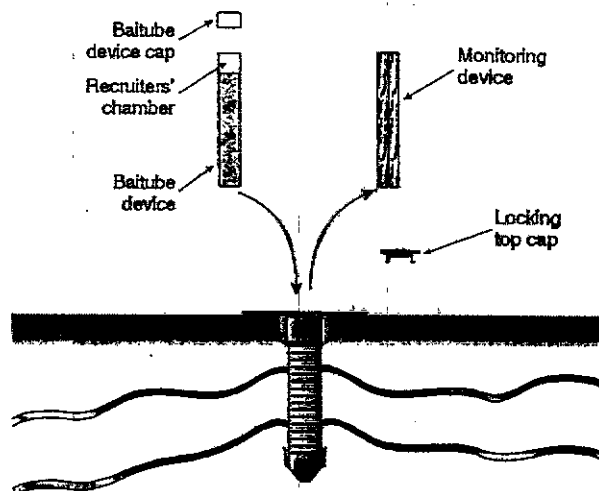
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1. Prepare the Baitube for introduction of termites as follows:
 - (1) Remove the cap.
 - (2) Add a minimum of 20 ml of water to the Self-Recruitment chamber. In arid areas and in dry soils, add up to 80 ml of water before introducing termites to the chamber. This moisture is necessary for termites to survive the Self-Recruitment procedure. Allow the water to be completely absorbed by the bait before transferring termites to the chamber.
2. Transfer termites from the infested monitoring device to the Self-Recruitment chamber of the Baitube as follows:
 - (1) Remove monitoring device from the Sentricon station and place in a container suitable for collecting termites and associated debris that will be introduced into the Self-Recruitment chamber. A shallow pan works well for this purpose, or, with experience, users may fashion other devices more suitable for this purpose.
 - (2) Carefully remove termites, debris, soil and mud tube material from the surface of the monitoring device. Save this material to add to the Self-Recruitment chamber along with termites.
 - (3) Separate the halves of the monitoring device and gently tap them to dislodge as many termites as possible into the collecting pan.
 - (4) Introduce the termites and debris collected into the Self-Recruitment chamber of the Baitube. Excess debris and termites may be discarded or used to initiate the Self-Recruitment process in an auxiliary Sentricon station placed adjacent to the primary baited station (see Installation of Auxiliary Stations).
 - (5) Replace the cap of the Baitube. Avoid harming termites placed in the chamber when replacing the cap. If the chamber is overfilled, wait for excess termites to move out of the way to avoid injuring them since dead termites may repel nestmates from feeding at the bait station.
3. Remove the plastic covering of the Baitube at the perforations to expose the termite access holes before inserting into the Sentricon station.
4. Complete the Self-Recruitment procedure by inserting the capped Baitube into the Sentricon station and replacing the outer cap of the station.

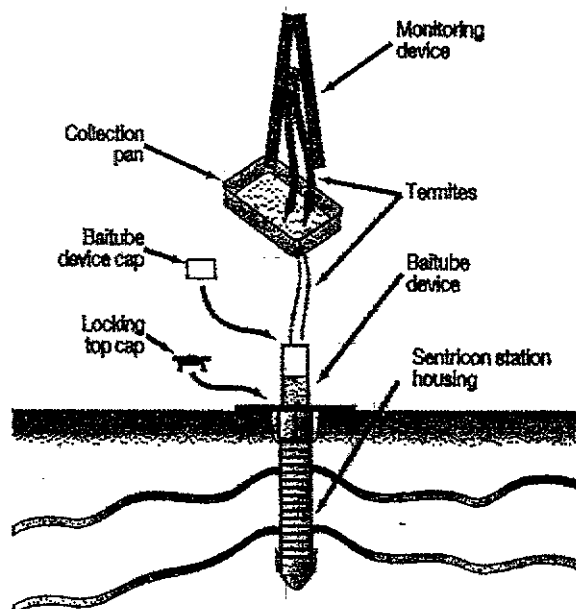
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Figure 1. (Refer to Self-Recruitment Procedure section)

1a. When termites are present during an inspection of the monitoring device in numbers sufficient for Self-Recruitment (about 40 worker termites), remove the monitoring device and replace it with a Baitube containing Recruit II.



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



2. Installation of Auxiliary Stations: A Sentricon station is considered to be free-standing if it is more than 12 inches from another Sentricon station. When a free-standing station is baited, install one or more auxiliary Sentricon stations containing monitoring devices within 12 inches of the baited station, if suitable ground access exists. Auxiliary Sentricon stations can be baited immediately if adequate numbers of termites can be collected to initiate the Self-Recruitment process. When auxiliary stations are baited at a subsequent inspection, continue to install auxiliary Sentricon stations as necessary. Installation of auxiliary Sentricon stations creates a cluster of two or more Sentricon stations in which each station is located 12 inches or less from adjacent station(s). Assure that one or more Sentricon stations per cluster contain monitoring devices.

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-2.3. 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 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. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, ~~tempests, hurricanes etc.~~), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco ~~or the seller and its Agents~~. All such risks shall be assumed by ~~buyer~~ the user.

Limitation of Remedies

The exclusive remedy for losses or damages resulting from 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 any fee paid by buyer or to DowElanco by the user for product bought,~~ in relation to use of the product at a particular site, or
2. Replacement of the amount of product used at a particular site, or

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 ~~consequential or incidental or consequential damages or losses.~~

The terms of the "Warranty Disclaimer" above and this "Limitation of Remedies" Except as is specifically authorized in this "Limitation of Remedies" section of this label, 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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