



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC 28 1999

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Robert F. Bischoff
Regulatory Manager, Regulatory Success-Americas
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Subject: Final Printed Labels
Conserve Fire Ant Bait (A.I. SPINOSAD)
EPA Registration No. 62719-304
Your Submission Dated September 23, 1999

Dear: Mr. Bischoff

The amendment referred to above, submitted in connection with registration under section 3 (c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed in our correspondence of November 16, 1999 and repeated below. These changes may be made at the next label printing. A stamped copy of the label is enclosed for your records.

1. Replace the word "Destroys" with "Controls" throughout the labeling.
2. Add the phrase "Hazard to Humans and Domestic Animals" to the "Precautionary Statements" section directly above the signal word "CAUTION". Add the statement "Wash thoroughly with soap and water after handling" immediately after the "Harmful if swallowed" statement.
3. Delete the label claim "Quickly stops aggressive biting and stinging" from the front panel. Quickly implies within minutes when it fact it may take 12-36 hours for such a response. This is misleading and may give a false sense of security to the user.

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure	7505C
	SPROAT
	12/28/99

(front panel)

Conserve* Fire Ant Bait

[icon] OUTDOOR USE ONLY
READY TO USE
Easy to Use
No Mixing Required/Necessary
Use Straight from the Bag (Bottle, Container)

Mound or Broadcast Treatments
No Watering Necessary

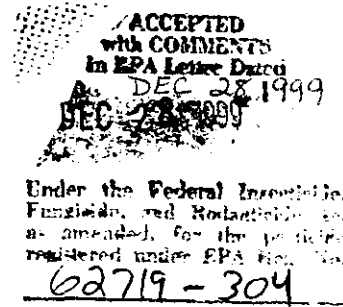
Kills Fire Ants
Kills the Queen(s)
Kills the Mound
Destroys the Mound
Eliminates/Destroys the Colony
Plus Helps Stop New Mounds from Forming
No Mound Movement
Destroys Mounds You See *plus* Those You Don't
Fast, Effective Kill of Fire Ants

Fast Acting
Dead Ants in 24 Hours
Controls Fire Ants for up to 2 Months
Fire Ants Find/Pick Up Bait in Minutes
Long Lasting Control

Quickly Stops Aggressive Biting and Stinging
Treats (depends on package size) Mounds

No Odor
Odor-Free
Contains Conserve*

Active Ingredient	
spinosad †	0.015%
Other Ingredients	99.985%
Total	100.000%



† A mixture of Spinosyn A & Spinosyn D

U.S. Patent No. 5,362,634 and 5,496,931

KEEP OUT OF REACH OF CHILDREN

CAUTION PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

Harmful if swallowed.

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Wash thoroughly with soap and water after handling.

FIRST AID

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Do not apply directly to any body of water. Do not put product or rinse water down any drain.

[phone icon] **Questions, Comments or Medical Information**
call 1-800-XXX-XXXX www. _____

EPA Reg. No. 62719-304

EPA Est. 00000-XX-00

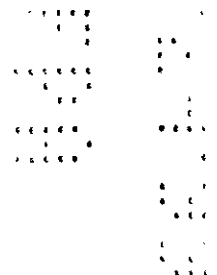
*Trademark of Dow AgroSciences LLC

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[Editor's note: substitute name and address of supplemental distributor.]

Insect Control

Net Contents, XXX



(back panel)

Product Facts	
Treats X Sq Ft [<i>Depends on package size</i>]	
Treats X Mounds [<i>Depends on package size</i>]	
KILLS	Fire Ants
PESTS/INSECTS/BUGS	
WHERE TO USE	<ul style="list-style-type: none"> • On Lawns • Perimeter of Home • Around Ornamental Plants (Flowers, Shrubs & Trees)
<p>[<i>phone icon</i>] Questions, Comments or Medical Information call 1-800-XXX-XXXX www._____</p>	

DIRECTIONS FOR USE

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

AMOUNT TO USE

- Mounds: 4 Tbs for each mound[†]
- Broadcast Application: 1/2 - 3/4 cup for each 1,000 sq ft

Tbs = Tablespoon

[†] For mounds greater than 15 inches in diameter use 6 Tbs per mound.

Do not use kitchen utensils for measuring. Keep measuring utensils with pest control products and away from children.

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Warranty Disclaimer

Seller 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. SELLER MAKES NO EXPRESS NOR 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 occur due to such factors as use of the product contrary to label instructions (including adverse conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as extreme weather conditions), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Seller. All such risks shall be assumed by Buyer.

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EPA Accepted: 10-28-98

