



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Jim Baxter
Regulatory Leader
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

NOV 26 2007

RE: Change by notification the use directions for monitoring interval and installation of Baitube™ devices on this supplemental label taken directly from the EPA accepted copy of the label dated February 9, 2007
EPA Registration Number: 62719-453
Date of Submission: November 16, 2007

Dear Mr. Baxter:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated November 16, 2007, for the product Recruit® IV. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
 Washington, DC 20460

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

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-453	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/Recruit™ IV	PM# 10	
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: EPA Reg. No. _____ 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.)

Change by notification:

1. The use directions for monitoring interval and installation of Baitube™ devices on this supplemental label are taken directly from the EPA accepted copy of the main label dated February 9, 2007.

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	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<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"/>	
6. Manner in Which Label is Affixed to Product		<input 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 Jim Baxter	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-4388
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 knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager	
4. Typed Name Jim Baxter ™Trademark of Dow AgroSciences LLC	5. Date November 16, 2007	

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Supplemental Labeling



Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268-1054 USA

Recruit™ IV EPA Reg. No. 62719-453

Directions for Use for Monitoring and Installation of Baitube™ devices

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Use of Recruit™ IV according to this supplemental labeling is subject to all use directions on the label booklet accompanying the container except as modified specifically by this supplemental labeling and where allowed by state regulatory authorities.
- Before using Recruit IV according to this supplemental labeling, read and understand the entire label. Carefully follow all precautionary statements and applicable use directions.

Directions for Use

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: Product not disposed of by use according to label directions should be wrapped in paper and placed in a trash can.

General Information

Recruit™ IV termite bait contains an insect growth regulator (IGR), noviflumuron, 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.

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 for placement into the Self-Recruitment™ chamber in the Baitube device. Although not mandatory, it has been shown that this Self-Recruitment procedure results in increased bait consumption as termites feed their way through the bait matrix as they seek to return to the colony and thereby recruit the active feeding of other colony members. This Self-Recruitment procedure further encourages the subterranean termite population to forage into and feed on Recruit IV termite bait.

Identify critical areas suitable for placing 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 Sentricon stations around the target site at intervals not to exceed 20 feet where soil access is not restricted.

Monitoring devices may be inspected monthly, bi-monthly or quarterly when termite activity is observed at the site and environmental conditions are favorable for termite feeding (**see note below**). If no termite activity is observed at the site, then inspection of the monitoring devices can be done on a monthly, bi-monthly or quarterly basis.

When termite activity is observed in a monitoring device, install a Baitube device containing Recruit IV. Although not mandatory, it is also recommended to install auxiliary Sentricon station(s) as per label directions in section II "Installation of Auxiliary Stations." Baited Sentricon stations may be inspected monthly, bimonthly or quarterly. If, upon inspection, no active termites or evidence of new termite feeding on Recruit IV bait is observed, replace the Baitube with a monitoring device and resume monitoring on a monthly, bi-monthly or quarterly basis, provided the control program is continuing. If auxiliary Sentricon stations have been installed and there are no termites in them, they may be removed leaving the original Sentricon station with monitoring device in place.

Note: Unfavorable conditions including, but not limited to, frozen or water saturated soil or normal seasonal decline in subterranean termite foraging activity may temporarily disrupt feeding on Recruit IV. Seasonal effects on termite activity vary geographically, but feeding activity typically declines during periods when the historical average daily temperature falls below 50°F. Monitoring may be suspended during these periods. (Refer to National Weather Service data or contact Dow AgroSciences for information regarding local mean temperatures.) However, do not allow more than six months to elapse between monitoring visits.

Installation of the Baitube Device Containing Recruit IV

Upon inspection, install Baitube devices as indicated below if live termites are observed in the monitoring station or there is evidence of termite feeding activity as indicated by consumption of the monitoring device.

In areas where termites, evidence of termite activity or conditions conducive to termite activity are observed, Baitube devices containing Recruit IV termite bait may be installed in auxiliary stations without the termites first having been found in monitoring devices. Under these conditions, auxiliary stations containing a Baitube device may be installed, provided the auxiliary stations are located within 12 inches of a Sentricon station containing monitoring devices.

Termite feeding on Recruit IV can be enhanced by adding a minimum of 0.7 fluid ounces (approx. 20 mL) of water or a sugar-containing solution such as a sports performance drink to the Self-Recruitment chamber of the Baitube device. In arid areas and in dry soils, add up to 2.7 fluid ounces (approx. 80 mL) of water or sugar-containing solution before introducing termites to the chamber.

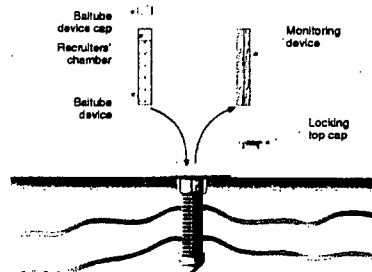
I. **Self-Recruitment Procedure:** If the self-recruitment procedure is utilized, remove termites present in the monitoring device and introduce them into the Self-Recruitment chamber in the top of the Baitube as follows (refer to Figure 1):

1. Prepare the Baitube for introduction of termites as follows:
 - (1) Remove the cap.
 - (2) Add water or sugar-containing solution as previously described. This moisture is necessary for termites to survive the Self-Recruitment procedure. Allow the water or sugar-containing solution to be completely absorbed by the bait before transferring termites to the chamber.

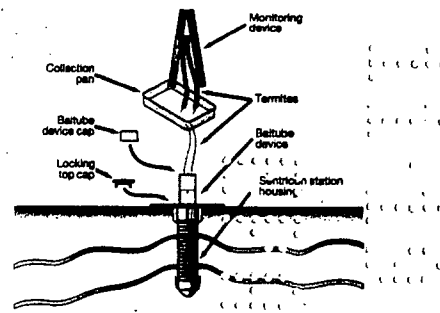
2. Transfer termites from the infested monitoring device to the Self-Recruitment chamber of the Baitube as follows:
 - (1) Remove monitoring device from the Sentricon station and place in a container suitable for collecting termites and associated debris that will be introduced into the Self-Recruitment 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) If possible, 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.

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

1a. When termite feeding activity is observed in a monitoring device, remove the monitoring device, and replace it with a Baitube containing Recruit IV. Use worker termites, if present, for Self-Recruitment procedure.



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



II. Installation of Auxiliary Stations: A Sentricon station is considered to be free-standing if it is more than 12 inches from another Sentricon station. 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 an adjacent station(s). Although not mandatory, it has been shown that when a free-standing station is

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baited with Recruit IV, installation of one or more auxiliary Sentricon stations containing a Baitube device within 12 inches of the baited station, if suitable ground access exists, aids in increased bait consumption. Auxiliary Sentricon stations may be baited immediately or they may contain a monitoring device. The self-recruitment process may be utilized in baited auxiliary stations if adequate numbers of termites are available.

III. 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 a new Baitube containing Recruit IV. 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.

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Initial printing

