

62719-453

7/28/2010

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

JUL 28 2010

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

Subject: Application for Pesticide Notification
EPA Registration Number: 62719-453
Date of Submission: June 30, 2010

Dear Mr. Baxter:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated June 30, 2010, for the above mentioned product. 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 regarding this letter, please contact Clayton Myersat (703) 347-8874.

Sincerely,

A handwritten signature in black ink, appearing to be "MS" or similar initials, written over a circular stamp or mark.

for Mark Suarez
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosures: Copy of Label Stamped "Notification"



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 Mark Suarez	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/Recruit IV	PM# 13	
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 _____	

NOTIFICATION
JUL 28 2010

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.)

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

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	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph 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) 337-4368 (fax: 317-337-4649)
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 <i>Jim Baxter</i>	3. Title Regulatory Manager	
4. Typed Name Jim Baxter (jpbaxter@dow.com)	5. Date June 30, 2010	

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

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308/2E
June 30, 2010



Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

NOTIFICATION
JUL 28 2010

RECRUIT IV (A.I. NOVIFLUMURON)
EPA REGISTRATION NUMBER: 62719-453
NOTIFICATION OF MINOR LABEL CHANGE PER PR NOTICE 98-10

Enclosed please find labeling for the notification action of Recruit® IV termite bait. The following changes have been made by notification:

1. Updated trademark symbol throughout.
2. Moved generic descriptor "termite bait" directly underneath product name.
3. Ingredients statement: Changed "Inert" to "Other."
4. Deleted "U.S. Patent 5,886,221."
5. Deleted references to web site.
6. Added "Produced for" before name and address.
7. Storage and Disposal: Added "Pesticide" before "Storage" and before "Disposal."

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled Recruit IV (M7A/Recruit IV/Notif/06-30-10) (9 Pages plus Registration Notes) (1 Copy)

If you require further information, please contact Cindy Loy, Regulatory Specialist at (317) 337-4655.

Sincerely,

Jim Baxter
Regulatory Leader
(317) 337-4388
(317) 337-4649 (FAX)

Enclosures

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(Base label):

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

Recruit® IV

Termite Bait

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

Active Ingredient: noviflumuron	0.5%
Other Ingredients	99.5%
Total.....	100.0%

NOTIFICATION

JUL 28 2010

Keep Out of Reach of Children

CAUTION

Precautionary Statements

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 Baitube™ devices in depressions, low areas, near ponds, streams, springs, other water sources, or near downspout openings when the bait or its noviflumuron contents could be washed out of the Baitube into water at or near the surface of the ground. Do not use, handle or tamper with the bait container in a manner inconsistent with this label.

Storage and Disposal

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

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

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

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.

EPA Reg. No. 62719-453

EPA Est. _____

®Trademark of Dow AgroSciences LLC

Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Net Weight __

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(Label booklet cover):

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

Recruit[®] IV

Termite Bait

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

Active Ingredient: noviflumuron	0.5%
Other Ingredients	99.5%
Total.....	100.0%

Keep Out of Reach of Children

CAUTION

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.

EPA Reg. No. 62719-453

®Trademark of Dow AgroSciences LLC

**Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268**

Net Weight ____

(Bait label):

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

Recruit[®] IV

Termite Bait

Active Ingredient: noviflumuron	0.5%
Other Ingredients	99.5%
Total.....	100.0%

Keep Out of Reach of Children

Refer to label booklet for Directions for Use.

EPA Reg. No. 62719-453

EPA Est. _____

[®]Trademark of Dow AgroSciences LLC

Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Net Weight ____



(Page 1 through end):

Precautionary Statements

Hazards to Humans and Domestic Animals

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 noviflumuron contents could be washed out of the Baitube into water at or near the surface of the ground. Do not use, handle or tamper with the bait container in a manner inconsistent with this label.

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.

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

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

Handling Procedures

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

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.

Recruit IV 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, Recruit IV, when the presence of subterranean termites is observed or evidence of termite activity has been detected; and (3) continued inspection and monitoring of the site for the presence of termite activity after 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 provides an on-going preventive service in order to detect and eliminate any new termite activity.

When termite activity is detected and feeding of Recruit IV 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 Recruit IV. Subterranean termites secrete 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.

Target sites for this system can include buildings, fences, utility poles, decking, landscape plantings and trees or other features that could be damaged by termite feeding and foraging activity. Recruit IV can be used on the inside or outside of foundation walls of crawl space areas or through concrete and asphalt if adequate soil is not accessible and such action is warranted. Recruit IV may be used in lieu of a pre-construction termiticide (chemical barrier) treatment as a means of preventing termite infestation of new structures.

In Florida, when the Sentricon System is installed for protection of new structures in lieu of a preconstruction termiticide treatment, the requirements for monitoring during the first year following installation of the Sentricon System specified in supplemental labeling entitled "Requirements for Baited Sentricon Stations Installed at New Structures" must be followed. This supplemental label must be in the possession of individuals installing or inspecting the Sentricon System at new structures.

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.

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 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.

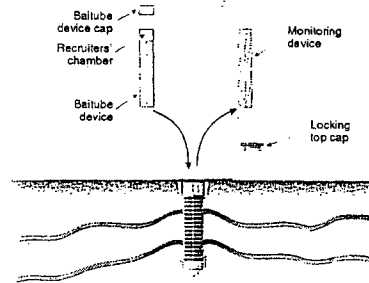
In areas where termites, evidence of termite activity or conditions conducive to termite activity are observed, Baitube devices containing Recruit IV may be installed in auxiliary stations without the termites first having been found in monitoring devices. Under these conditions, auxiliary stations containing 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 fl oz (approximately 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 fl oz (approximately 80 mL) of water or sugar-containing solution before introducing termites to the chamber.

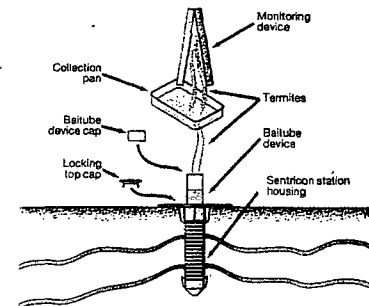
- I. **Self-Recruitment Procedure:** If the self-recruitment procedure is utilized, remove termites present in the monitoring device and introduce them into the Self-Recruitment chamber in the top of the Baitube as follows (refer to Figure 1):
 1. Prepare the Baitube for introduction of termites as follows: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

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitations of Remedies.

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

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, etc.), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. All such risks shall be assumed by the user.

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 Dow AgroSciences' 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

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.

The terms of the Warranty Disclaimer, Inherent Risks of Use, and 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 Limitation of Remedies in any manner.

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EPA accepted: 02/09/07