

62719-454

10/11/2005

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0080. Approval expires 2-28-95



United States Environmental Protection Agency Washington, DC 20460

Registration Amendment Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: Dow AgroSciences/62719-454
2. EPA Product Manager: Richard Gebken
3. Proposed Classification: None
4. Company/Product (Name): Dow AgroSciences/Recruit III AG (ABN: Recruit IV AG)
5. Name and Address of Applicant: Dow AgroSciences LLC, 9330 Zionsville Road, Indianapolis, IN 46268
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 Section - II

Amendment - Explain below. Resubmission in response to Agency letter dated. Notification - Explain below. Final printed labels in response to Agency letter dated. "Me Too" Application. Other - Explain below.

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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Source Section 3 supplemental labeling text based on EPA-accepted copy of main label dated October 12, 2004.

Supplemental label containing the use directions from the EPA-accepted copy of the main label dated October 12, 2004.

Section - III

1. Material This Product Will Be Packaged In: Child-Resistant Packaging, Unit Packaging, Water Soluble Packaging, 2. Type of Container: Metal, Plastic, Glass, Paper, Other (Specify)
3. Location of Net Contents Information: Label, Container
4. Size(s) Retail Container
5. Location of Label Directions
6. Manner in Which Label is Affixed to Product: Lithograph, Paper glued, Stenciled, Other

Section - IV

1. Contact Point: Name: A. Sterett Robertson, Title: Regulatory Manager, Telephone No.: (317) 337-4384
Certification: I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
2. Signature: Amy Sterett Robertson
3. Title: Regulatory Manager
4. Typed Name: A. Sterett Robertson
5. Date: September 27, 2005
6. Date Application Received (Stamped)

# Recruit<sup>™</sup> III AG

EPA Reg. No. 62719-453

Alternate Brand Name: Recruit IV AG

## Registration Notes:

Source label text based on EPA-accepted copy dated October 12, 2004.

### Changes by Notification:

1. Supplemental label containing the use directions from the EPA-accepted copy of the main label dated October 12, 2004.

<sup>™</sup>Trademark of Dow AgroSciences LLC

# Supplemental Labeling



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

## Recruit™ III AG EPA Reg. No. 62719-454

### Clarification of Monitoring Intervals Based on Termite Feeding Activity

#### 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.
- This supplemental labeling provides updated guidance for monitoring of Sentricon® stations based on the level of termite feeding activity and may be used in place of the product label provided with Recruit™ III AG termite bait where allowed by state regulatory authorities.
- Before using Recruit III AG according to this supplemental labeling, read and understand the entire label. Carefully follow all precautionary statements and applicable use directions.

#### Directions for Use

##### General Information

Recruit™ III AG termite bait is an above ground station of the Sentricon® *Termite Colony Elimination System* and may be used to eliminate subterranean termite colonies. Recruit III AG contains the insect growth regulator (IGR), noviflumuron, which prevents successful molting and development of subterranean termites. This disruption of development results in the decline and ultimate elimination of the termite colony when it can no longer sustain itself. Recruit III AG may be used against economically important species of termites, including *Coptotermes*, *Reticulitermes*, and *Heterotermes* spp. Target sites for use of this product include interior and exterior surfaces of buildings and crawl spaces, fences; utility poles, decking, landscape decorations, trees, or other features that could be damaged by termite foraging and feeding activity.

A thorough understanding of the biology and behavior of subterranean termites relative to building construction and landscape features is essential for effective use of this product.

Once installed, Recruit III AG must remain in place as long as termites are actively feeding on the bait material. Recruit III AG should be inspected regularly to ensure that termites do not entirely consume the bait matrix. If only one station is used at a specific target site, Recruit III AG should be inspected at 2 to 4 week intervals during active feeding in order to maintain Recruit III AG as a constant source of food. Longer inspection intervals may be utilized if the quantity of bait available for termite feeding is increased. The inspection interval may be monthly, bi-monthly or quarterly if Recruit III AG is used in conjunction with Sentricon System in-ground stations, if multiple stations of Recruit III AG are installed at a specific target site, or if Recruit III AG stations are stacked. Access to additional bait matrix at a specific target site may be provided by "stacking" Recruit III AG stations one on top of another. Stations may be stacked during the initial installation or during a subsequent inspection if one-third to one-half of the bait matrix has been consumed and active feeding continues. Details of this process are provided in the Installation of Supplemental Recruit III AG Stations section of this label. When feeding in the stations has stopped, the Recruit III AG stations can be removed.

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Do not re-use Recruit III AG stations. Subterranean termites secrete colony specific pheromones that become incorporated into the material during feeding and foraging. The pheromones deposited in the material by one colony will induce feeding deterrence or repellency in members of other colonies and thereby prevent feeding and toxicant delivery.

Recruit III AG can be used in conjunction with other termite control methods, including soil barrier treatments and monitoring/baiting of Recruit III in the Sentricon System stations used in ground. However, application of a liquid soil barrier treatment to the area through which termites must pass to reach a Recruit III AG installation will prevent feeding and should be delayed until the entire baiting process is completed.

**Food Handling Establishments:** Recruit III AG may be installed in both food and nonfood areas of all types of food-handling establishments, i.e., food service, food processing and food manufacturing establishments. This includes, but is not limited to, restaurants, grocery stores, bakeries, bottling plants, canneries, meat and poultry processing plants, and grain mills.

### **Inspection of Structures**

Thorough inspection of the site to be protected is required to determine if subterranean termites are present and accessible. Treatment sites may include the interior and exterior surfaces of buildings and crawl spaces, fences, utility poles, decking, landscape decorations, trees, and other features that could be damaged by termite foraging and feeding activity.

Recruit III AG is effective only when applied to areas where termites are active and direct access to the station is possible. Installation of Recruit III AG does not attract termites. Areas suitable for placement of Recruit III AG include interior and exterior surfaces where:

- 1) Live termites are visually observed in mud tubes or subsurface galleries;
- 2) Feeding activity is detected using an acoustic emission detector; or
- 3) Termite mud tubes, feeding damage, or emergence holes have recently appeared.

The surface area for installation of Recruit III AG should be large enough to allow the station to be firmly attached to the structure.

Once suitable areas for placement are identified, some surface preparation may be necessary before installation of Recruit III AG. In areas where there are no obvious subsurface mud tubes, feeding damage, or emergence holes, but termite feeding activity is detected, holes approximately 3/8-inch in diameter may be drilled to intercept feeding galleries within the area to be covered by the bait station. Be careful not to scrape off or disturb surface mud tubes during the drilling process.

### **Installation of Recruit III AG**

The Recruit III AG station consists of a rigid plastic housing containing the bait matrix packet or rolls. A removable cover allows for internal inspection of the bait station after installation. When attached to the mounting surface, the access window (open side) of the bait station allows termite's direct access to the bait. Breakout points in the mounting surfaces surrounding the access window may be removed to avoid damage to surface mud tubes or allow better contact with the mounting surface.

#### **Installation Procedure:**

1. Inspect the site to which the Recruit III AG station will be attached to determine if the surface is suitable for attachment.
2. Always moisten the bait matrix before securing the station in place. If the bait station contains bait rolls, add 1 to 2 fl oz (30 to 60 ml) of water or a sugar-containing sports performance drink to the bait rolls, pouring slowly while allowing the liquid to fully absorb. If the bait station contains a bait packet, remove and open the packet and add 4 to 7 fl oz (120 to 210 ml) of water or a sugar-containing sports performance drink to the bait matrix. Reseal the packet and knead the matrix contents until the wetting agent has been fully absorbed. Once the wetting agent is absorbed, expose the bait matrix by

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creating access points for entry of termites in the packet. Reinsert the bait matrix packet into the bait station. The side with access points must be visible in the access window of the station to ensure the bait is exposed and in contact with the mounting surface.

3. Align the access window of the station housing with the termite gallery openings, exit holes, drilled holes, or mud tubes and secure the station to the surface.

**Note:** When mounting the bait station to surfaces containing surface mud tubes, a segment of each tube within the area to be covered by access window should be removed. This opening provides termites with direct access to the bait. Avoid crushing surface mud tubes when installing the bait station as this block termite access to the bait. Appropriate use of breakout points where surface mud tubes intersect the edges of the station housing will allow secure attachment without crushing the mud tubes.

4. Firm and secure attachment of the station housing to the structure is necessary for it to remain in place under adverse weather conditions and to prevent tampering. Suitable attachment materials include screws, tape, non-volatile adhesives, latex-based caulk, or other appropriate materials. (**Note:** Avoid use of adhesives or caulking materials with volatile solvents that can temporarily repel termites.) Apply adhesive caulking material to the surfaces of the station housing which contact the mounting surface, but do so only after the final mounting position has been determined and, if necessary, breakout points have been removed. If adhesive is not desired, a foam gasket is included. Place the gasket between the mounting surface of the station and the termite infested structure. Align the holes in the gasket with the screw holes in the station and attach station to termite infested surface. The method of attachment should not interfere with removing the cover to inspect the bait or add a supplementary station.

Termites may abandon a station that allows light, air movement, drying of the matrix, or invasion by ants or other predators. Proper attachment and sealing of the station housing to the structure is critical.

5. After attachment of the station, replace and secure the cover.

### Inspection of Recruit III AG

To inspect Recruit III AG, remove the cover to expose the bait matrix. If termites are active in the station and the matrix appears to be at least 1/3 to 1/2 consumed, a supplemental station should be added. If the bait matrix is moldy or degraded, it should be removed and replaced either with a new bait matrix packet or new station. If the bait matrix has dried out and contains no termites, it may be replaced with a fresh bait matrix packet that has been moistened as noted in Step 2 above or moisture may be added to the existing bait matrix. When termites are no longer actively feeding in a bait station, it should be removed.

If only one station is used at a specific target site, and Sentricon System in-ground stations are not being used, Recruit III AG stations should be inspected at 2 to 4 week intervals while termites are actively feeding in order to maintain Recruit III AG bait as a constant source of food. If the entire contents of the bait station are consumed before replenishment, termites will forage elsewhere for food and water. The inspection interval may be increased to monthly, bi-monthly or quarterly if Recruit III AG is used in conjunction with Sentricon System in-ground stations, if multiple stations are installed at a specific target site, or if Recruit III AG stations are stacked. During inspection, check bait stations for secure attachment to the mounting surface and reinforce if necessary.

### Installation of Supplemental Recruit III AG Stations

Recruit III AG stations are designed to accommodate the addition of a supplemental station by "stacking" a new station on top of an existing one. Stacking allows uninterrupted feeding without disturbing the termites in the original station. Moisture should be added to the supplemental station before installation as described in the Installation of Recruit III AG section of this label. Gaskets, which may be used for mounting the original stations, should *not* be used between stacked stations.

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- Remove the cover from the existing station. After moistening as noted in Step 2 above, bait matrix should be exposed so termites can readily access the bait in the stacked station.
- Snap the new station and cover into place on top of the existing station.

Up to two stations (original plus 1) may be stacked at one location. Stacking of more than two stations is unnecessary and is undesirable for aesthetic and practical reasons. If it is necessary to continue baiting after two stations have been stacked, remove the second station, leaving the original station in place and add the new station on top of it. This procedure will ensure that foraging termites are minimally disturbed and that colony specific pheromones will remain at the site.

Inspect supplemental stations regularly as described in the Inspection of Recruit III AG section of this label.

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R192-001

EPA-Accepted: 10-12-2004

Replaces: Initial printing.

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308/2E  
September 27, 2005

NOTIFICATION



OCT 11 2005

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U. S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1801 South Bell Street  
Arlington, VA 22202

RECRUIT III AG (AI: NOVIFLUMURON)  
ALTERNATE BRAND NAME: RECRUIT IV AG  
EPA REGISTRATION NUMBER: 62719-454  
NOTIFICATION OF MINOR LABEL CHANGE PER PR NOTICE 98-10

Enclosed please find labeling for the notification action of Recruit<sup>TM</sup> III AG termite bait (alternate brand name Recruit IV AG). The supplemental label contains the use directions from the EPA-accepted copy of the main label dated October 12, 2004.

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 III AG (M7A / Recruit III AG / Sec 3 Extended Monitoring Interval MTR Notif / 09-27-05) (4 Pages) (5 Copies)

If you require further information, please contact Amy Hudson, Regulatory Specialist at 317-337-3967 or Alice Watters, Registration Assistant for this product, at 317-337-5364.

Sincerely,

A handwritten signature in cursive script that reads "Amy Hudson/fa".

A. Sterett Robertson  
Regulatory Leader  
Regulatory Success – Americas  
317-337-4384  
317-337-4649 (FAX)

ASR/aw  
Enclosures

