



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 9, 2014

Mr. James D. Thomas Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268

Subject:

Amendment: Revise Monitoring Statements & Provide Installation Instructions for

New Cover

Recruit® IV AG

EPA Reg. No. 62719-454

Your Submission Dated January 15, 2014

Dear Mr. Thomas:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,

Richard Gebken

Product Manager Team 10

Insecticide Branch

Registration Division (7505P)

Enclosure

Page 1

2/

(base label):

Recruit IV AG termite bait must be used in conjunction with a service provided by a pest management professional licensed by the state to apply termite control products.

Recruit® IV AG

TERMITE BAIT

A termite bait for use as an above-ground delivery system for elimination of subterranean termite colonies

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

Keep Out of Reach of Children

Do not tamper with bait material.

Environmental Hazards

This product is highly toxic to aquatic invertebrates and possibly to fish. Do not_allow the bait or its noviflumuron contents to be washed into a body of water containing aquatic life, such as a pond or stream. 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.

Container Handling: Do not break open, cut into or remove protective wrapper from product until ready for use.

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. 62719-454

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

NET WEIGHT ____

ACCEPTED

04/09/2014

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 00740, 454

62719-454

[®]Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

(cover, shipping container):

Recruit IV AG termite bait must be used in conjunction with a service provided by a pest management professional licensed by the state to apply termite control products.

Recruit® IV AG

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EPA Reg. No. 62719-454

[®]Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

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

NET WEIGHT

(bait label):

Recruit IV AG termite bait must be used in <u>conjunction with</u> a service provided by a pest management professional licensed by the state to apply termite control products.

Recruit® IV AG

TERMITE BAIT

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

Keep Out of Reach of Children

Refer to label booklet Directions for Use.

EPA Reg. No. 62719-454

EPA Est. _____

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

NET WEIGHT

[®]Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

(Page 1 through end):

Do not tamper with bait material.

Environmental Hazards

This product is highly toxic to aquatic invertebrates and possibly to fish. Do not allow the bait or its noviflumuron contents to be washed into a body of water containing aquatic life, such as a pond or stream. 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.

Container Handling: Do not break open, cut into or remove protective wrapper from product until ready for use.

Product Information

Recruit IV AG termite bait is an above-ground station and delivery system for the Sentricon® System and may be used to eliminate subterranean termite colonies. Recruit IV AG contains the insect growth regulator (IGR) noviflumuron that prevents successful molting and development of subterranean termites. This disruption of development causes a decline of the termite colony to the point where the colony can no longer sustain itself and is eliminated.

Recruit IV AG is used against structurally damaging species of subterranean 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 feeding and foraging activity.

When used alone as a control system, stations with Recruit IV AG must be inspected on at least a quarterly basis so that bait remains available. Recruit IV AG may also be used as a spot treatment without a specified inspection interval if used in conjunction with the in-ground installation of the Sentricon® System.

If using the station hard cover, access to additional bait matrix at a specific target site may be provided by "stacking" stations with Recruit IV AG 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 Stations with Recruit IV AG section of this label. When feeding in the stations has stopped, the stations with Recruit IV AG can be removed. Do not re-use Recruit IV AG.

When Recruit IV AG, is used in conjunction with other termite control methods, including soil barrier treatments, an in-ground installation of Sentricon[®] must be made. However, applications and treatments with other termite control methods in the areas through which termites must pass to reach an installation of Recruit IV AG will prevent feeding and should be delayed until the entire baiting process is completed.

Food Handling Establishments

Recruit IV AG may be installed in both food and non-food areas of all types of food handling establishments, i.e., food service, food processing, and food manufacturing establishments. This

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

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

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

Installation of Recruit IV AG

The flexible station with Recruit IV AG consists of a flexible package containing the bait matrix and two cover options, either a hard cover or flexible cover. The cover allows for inspection of the bait station after installation. The flexible cover allows the station to fit in and around corners, over ornate molding and into smaller areas than the hard cover. The hard cover provides additional protection of the flexible station when needed. The hard cover option also allows for stations to be easily stacked and contains breakout points in the mounting surfaces surrounding the access window which may be removed to avoid damaging mud tubes or to provide better contact with the mounting surface.

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.

Bait and Surface Preparation

- 1. Inspect the site to which the station with Recruit IV AG will be attached to determine if the surface is suitable for attachment and best cover option.
- 2. Once suitable areas for placement are identified, some surface preparation may be necessary before installation of Recruit IV 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
- 3. Moisten the bait matrix before securing the station in place. To moisten, open the flexible station and add sufficient water or a sugar-containing sports performance drink to thoroughly moisten the bait matrix. Knead the matrix contents until the wetting agent has been fully absorbed. Once the wetting agent is absorbed, expose the bait matrix by creating access points for entry of termites in the flexible station. Regardless of whether installing the flexible station directly on to a target site or into the hard cover placed over a target site, the opened side with access points must be exposed and in contact with the mounting surface where termite activity is present.

Installing the Flexible Station with the Flexible Cover

- 1. Break the mud tube or if necessary, drill 3/8" hole to intercept feeding galleries:
- 2. Affix the flexible station to the target site so that it sits over the opening in the mud tube or area of

termite activity. Take special care not to crush or block the mud tube from entering the station. 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.)

3. Place the flexible cover over the flexible station so that the station is completely covered and affix to site. As when affixing the station, care should be taken to not crush or block the mud tube from entering the station when affixing the cover.

Installing the Flexible Station with the Hard Cover

- 1. Break the mud tube or if necessary, drill 3/8" hole to intercept feeding galleries.
- 2. Affix the flexible station to the target site so that it sits over the opening in the mud tube or area of termite activity. Take special care not to crush or block the mud tube from entering the station. 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.)
- 3. Align the back open side of the hard cover so that it fits over the installed flexible station. Ensure the entire flexible station is covered and secure the hard cover to the surface.
 - a. Appropriate use of breakout points where surface mud tubes intersect the edges of the hard cover will allow secure attachment without crushing the mud tubes.
 - b. Securely attach the hard cover to the structure. 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 hard cover 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. The method of attachment should not interfere with removing the cover to inspect the bait or add a supplementary station.
- 4. Alternatively, the hard cover may be installed first as in step 3 and the flexible station inserted after installation.
 - a. When mounting the hard cover to surfaces containing surface mud tubes, a segment of each tube within the area to be covered should be removed as described in Step 1. This opening provides termites with direct access to the bait when inserted into the cover.

Inspection of Recruit IV AG

To inspect Recruit IV AG, 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 new station should be installed or a supplemental station should be added. If the bait matrix is degraded, it should be removed and replaced with a new station.

If the entire contents of the bait station are consumed before replenishment, termites may forage elsewhere. When used alone as a control system, stations with Recruit IV AG must be inspected on at least a quarterly basis. During inspection, check bait stations for secure attachment to the mounting surface and reinforce if necessary.

Installation of Supplemental Stations with Recruit IV AG

Stations installed with the Recruit IV AG hard cover can accommodate the addition of a supplemental station by "stacking" a new station and hard cover on top of an existing one. Stacking allows uninterrupted feeding without disturbing the termites in the original station. Moisture may be added to the supplemental station before installation as described in the Installation of Recruit IV AG section of this label.

- Remove the top cover from the existing hard cover. After moistening as noted in Step 2 of Bait Preparation, expose bait matrix so termites can readily access the bait in the stacked station.
- Affix the new station and hardcover into place on top of the existing station and hard cover.

Up to two stations (original plus 1) may be stacked at one location. 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.

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

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, to the extent permitted by law, 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. TO THE EXTENT PERMITTED BY LAW, 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 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. To the extent permitted by law, all such risks shall be assumed by the user.

Limitation of Remedies

To the extent permitted by law, 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.

To the extent permitted by law, 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. To the extent permitted by law, 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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