

62719-608

03-09-2010  
COMPLIMENTARY  
COPY

1  
7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

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

MAR - 9 2010

Subject: Label for Recruit HD  
EPA Registration No. 62719-608  
Letter dated 15 October 2009

Dear Mr. Baxter:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) §3(c)(5), is acceptable provided that you:

1. Modify the label text in the section "Service of Recruit HD" as indicated:
  - o Change the first sentence of the third paragraph from "Termite stations containing Recruit HD must be inspected and serviced at intervals not exceeding twelve months unless unfavorable conditions exist, but do not allow more than fifteen months to elapse between inspections." to "Sentricon stations containing Recruit HD must be inspected and serviced at intervals not exceeding twelve months, unless unfavorable conditions exist. Do not allow more than fifteen months to elapse between inspections."
2. Provide two copies of the final printed master labeling. These must be submitted prior to releasing the product for shipment.

If these conditions are not met, the registration will be subject to cancellation in accordance with FIFRA §6 and/or may be found to be misbranded and referred to OECA for enforcement. Your release for shipment of the product constitutes acceptance of these conditions

A stamped copy is enclosed for your records. If you have any questions, you may contact Mark E. Suarez, at (703) 305-0120.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Suarez", with a large, stylized flourish at the end.

Mark E. Suarez  
Product Manager 13  
Insecticide Branch  
Registration Division (7504P)

Enclosure  
062719-00608 S860464.doc

(Base Label):

**Recruit HD 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<sup>®</sup> HD

## Termite Bait

**A durable termite bait for use in an integrated management system for protection of structures against subterranean termites**

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

U.S. Patent 5,886,221

**Keep Out of Reach of Children**

### 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 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 shall 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. 62719-608

EPA Est. \_\_\_\_\_

® Trademark of Dow AgroSciences LLC

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

**Net Weight** \_\_\_\_\_

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

**MAR - 9 2010**

**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
62719-608**

3  
7

(label booklet cover):

**Recruit HD 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<sup>®</sup> HD**

### **Termite Bait**

**A durable termite bait for use in an integrated management system for protection of structures against subterranean termites**

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

U.S. Patent 5,886,221

### **Keep Out of Reach of Children**

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. 62719-608

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

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

**Net Weight: \_\_\_\_\_**

(bait label):

**Recruit HD 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<sup>®</sup> HD**

### **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. 62719-608

EPA Est. \_\_\_\_\_

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

**Net Weight** \_\_\_\_\_

(Page-1 through end):

### 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 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 shall 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.

### General Information

Recruit<sup>®</sup> HD termite bait contains an 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 HD is used in the Sentricon<sup>®</sup> Colony Elimination System for prevention and 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 against subterranean termites. Use of this termite baiting system involves the installation of Recruit HD for delivery of noviflumuron coupled with concurrent monitoring and baiting of the site. When Recruit HD is inspected and replenished per label instructions, it provides on-going prevention and elimination of termite colonies.

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 HD can be used on the inside or outside of foundation walls of crawl space areas, or through access holes made through concrete and asphalt if adequate soil is not accessible and such action is warranted. Recruit HD 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 Recruit HD is installed for protection of new structures in lieu of a preconstruction termiticide treatment, the requirements for monitoring specified in supplemental labeling entitled "Requirements for Recruit HD Installed at New Structures" must be followed. This supplemental label must be in the possession of individuals installing or inspecting Recruit HD at new structures.

### Installation of Recruit HD

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 closer than 18 inches of structural foundations previously treated with a soil-applied 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.

Remove shrink wrap from Recruit HD. Place Recruit HD in each Sentricon station upon station installation. Recruit HD may also be placed in previously installed Sentricon stations upon removal of the existing monitoring device or bait.

### **Service of Recruit HD**

The purpose of the service phase is to detect the presence of subterranean termites or signs of termite activity in Recruit HD to monitor for termites, aid Recruit HD replacement, and to confirm colony elimination. This procedure does not attract termites from other locations.

Recruit HD is inspected manually for detection of termites, termite activity, or to identify the need to replace Recruit HD. If Recruit HD is more than 1/3 depleted, replace it with new Recruit HD. If possible, gently tap the termites from the used Recruit HD into the Sentricon station containing the new Recruit HD, being careful to not injure the termites. Introduce these termites after the new Recruit HD has been installed into the Sentricon station.

Sentricon stations containing Recruit HD must be inspected and serviced at intervals not exceeding twelve months unless unfavorable conditions exist, but do not allow more than fifteen months to elapse between inspections. Unfavorable conditions include frozen or water-saturated soil or normal seasonal decline in subterranean termite foraging activity that may temporarily disrupt feeding on Recruit HD. Seasonal effects on termite activity vary geographically, but feeding activity typically declines during periods when the local historical average daily temperature falls below 50° F. Inspection and servicing may be suspended during these periods; however, do not allow more than fifteen months to elapse between inspections. Refer to National Weather Service data or contact Dow AgroSciences for information regarding local historical average daily temperature.

---

### **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 Limitation 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 label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), 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 buyer.

---

### **Limitation of Remedies**

To the extent permitted by law, the exclusive remedy for losses or damages resulting from 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.

®Trademark of Dow AgroSciences LLC  
EPA accepted   /  /