



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 23, 2015

Jamey Thomas  
Regulatory Manager  
Dow AgroSciences LLC  
9330 Zionsville Rd.  
Indianapolis, IN 46268

Subject: Label Amendment – Revising this label to be in alignment with that of another Dow product’s label.  
Product Name: Recruit HD AG  
EPA Registration Number: 62719-652  
Application Date: April 1, 2015  
Decision Number: 503087

Dear Mr. Thomas:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

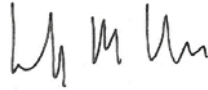
Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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Decision No. 503087

with FIFRA section 6. If you have any questions, please contact Jennifer Gaines at 703-305-5967 or via email at [gaines.jennifer@epa.gov](mailto:gaines.jennifer@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "J. Urbanski".

Jennifer Urbanski, PhD, Product Manager 4  
Invertebrate and Vertebrate Branch 1 (IVB1)  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

(base label):

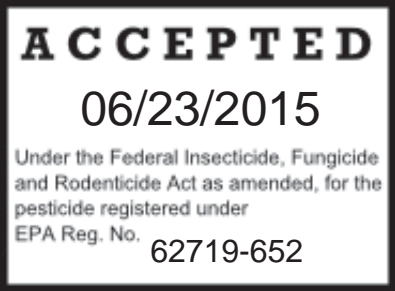
**Recruit HD AG termite bait must be used in conjunction with a service provided by a pest management professional licensed by the state to apply termite control products.**

# Recruit<sup>®</sup> HD 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. 62719-652

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

<sup>®</sup>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** \_\_\_\_

(cover, shipping container):

**Recruit HD 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.**

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

**NET WEIGHT \_\_\_\_\_**

(bait label):

**Recruit HD 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<sup>®</sup> HD AG

## TERMITE BAIT

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**NET WEIGHT** \_\_\_\_

(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.

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### **Directions for Use**

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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<sup>®</sup> HD AG termite bait is an above-ground station and delivery system for the Sentricon<sup>®</sup> System and may be used to eliminate subterranean termite colonies. Recruit HD AG 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 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 HD AG must be inspected on at least a quarterly basis so that bait remains available. Recruit HD 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<sup>®</sup> 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 HD 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 HD AG section of this label. When feeding in the stations has stopped, the stations with Recruit HD AG can be removed. Do not re-use Recruit HD AG.

When Recruit HD AG is used in conjunction with other termite control methods, including soil barrier treatments, an in-ground installation of Sentricon<sup>®</sup> must also 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 HD AG will prevent feeding and should be delayed until the entire baiting process is completed.

### **Food Handling Establishments**

Recruit HD 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 HD AG is effective only when applied to areas where termites are active and direct access to the station is possible. Installation of Recruit HD AG does not attract termites. Areas suitable for placement of Recruit HD 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 HD AG should be large enough to allow the station to be firmly attached to the structure.

### **Installation of Recruit HD AG**

The flexible station with Recruit HD AG consists of a flexible package containing the bait matrix and two cover options, 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 HD 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 HD 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 HD AG**

To inspect Recruit HD 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 HD AG must be inspected on at least a quarterly basis. During inspection, check bait stations for secure attachment and proper seal to the mounting surface and reinforce if necessary.

### **Installation of Supplemental Stations with Recruit HD AG**

Stations installed with the Recruit HD AG hard cover can 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 may be added to the supplemental station before installation as described in the Installation of Recruit HD AG section of this label.

- Remove the cover from the existing station. After moistening as noted in Step 2 of Bait



- Preparation, expose the bait matrix so termites can readily access the bait in the stacked station.
- Affix the new station and cover 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 HD AG section of this label.

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### **Terms and Conditions of Use**

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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.

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### **Warranty Disclaimer**

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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.

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### **Inherent Risks of Use**

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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.

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### **Limitation of Remedies**

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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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