

72155-68

08/10/2006

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Charles W. Boyd
Bayer Advanced
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

AUG 10 2006

Dear Mr. Boyd:

Subject: Labeling Amendment: Originally Submitted By Notification
Imidacloprid CTG Insecticide
EPA Registration No. 72155-68
Submission Date: May 12, 2006

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) As stated in the Agency letter dated October 14, 2005, all references to "treated zone" must be deleted from the label. As a result, rephrase the sentence "*Whenever you want to kill termites and create a termite treatment zone.*" found within the **QUICK FACTS** section of the label to read "*Whenever you want to kill termites.*". The sentence "*Do not disrupt soil in the treated zone.*" found within the **DIRECTIONS FOR USE** portion of the label must be replaced with the sentence "*Do not disrupt treated soil.*".

In addition, the request to add the alternate brand name BAYER ADVANCED TERMITE KILLER has been received, and the name has been found acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 206-0415.

Sincerely,

A handwritten signature in black ink, appearing to read "Virginia L. Taylor".

Virginia L. Taylor
Acting Product Manager (CI)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

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(Front Panel)

Imidacloprid CTG Insecticide

Ready-To-Spread Granules

- No odor
- [Insert Trademark] - Termites don't detect until it's too late
- Stops termite feeding
- Kills termites in one application
- Fast (Quick) releasing (dissolving) termite killing granules
- Treats the perimeter of an average home
- Do-It-Yourself Termite Killing Granules (against subterranean termites)
- Easy to use custom dispenser
- Fast releasing (dissolving) granules
- Easy to use granules: apply, water in, and walk away
- Contains Premise®
- Pour & Go - Easy to use granules: apply, water in, and walk away
- Easy to use granules: Sprinkle, water in, and walk away
- 100% Satisfaction Guaranteed* (or your money back)

Active Ingredients:

Imidacloprid 0.37%

Other Ingredients 99.63%

100.00%

Net Contents _____

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements

Do not use this product as the sole source of control for active, structural infestations by subterranean termites; the purpose of this application is to kill workers or winged reproductive forms of termites which may be present at the time of treatment. It is not intended to provide structural pest control. It is not a substitute for mechanical alteration, soil and foundation treatment, but merely a supplement. For active, structural infestations by subterranean termites, this product can only be used to supplement a federally registered conventional product that is registered as sole source for termite control. This product will not eliminate termite infestations or provide protection against future infestations.

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

AUG 10 2006

**Imidacloprid Insecticide,
Fungicide and Insecticide Act,
and the pesticide
registration under EPA Reg. No.**

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(Back Panel)

This product kills termites with a single application. Just spread the granules around the outside of your home, water in and walk away. Killing Termites around your home has never been easier.

- Break off tab
- Lift applicator spout to open
- Tilt container to apply
- To stop flow of product, tilt container upright
- (Hold container steady, as shaking will affect the flow of granules.)

READ THE LABEL FIRST!



QUICK FACTS	
Editorial Note – Marketing Claims Positioned Here	
KILLS	Termites: (including Subterranean termite species of <i>Reticulitermes</i> and <i>Coptotermes</i>)
COVERAGE	Will treat up to 200 linear feet with a 6 inch band (9 lb size) (treated area around an average size home)
WHERE TO USE	This product can be applied to areas that surround building structures, wooden fence posts or poles, other wooden constructions, subject to termite attack. Areas that can be treated include bare soils, landscaped planting areas, mulched areas and turfgrass
WHEN TO USE	Whenever you want to kill termites and create a termite treatment zone
	For questions or comments, call toll-free 1-877 BayerAG or visit us on-line at www.BayerAdvanced.com

For Outdoor Residential Use Only

Active Ingredients:

Imidacloprid 0.37%

Other Ingredients 99.63%

Total **100.00%**

EPA Reg. No. 72155 – 68

EPA Est. No. XXX-AA-XX

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

<p>BEFORE YOU USE Read and follow directions when using.</p>	<ul style="list-style-type: none"> • This product is a ready-to-use granule formulation of Imidacloprid intended to kill termites (including subterranean termite species of <i>Reticulitermes</i> and <i>Coptotermes</i>). • Determine distance in feet around your home. This 9.0 lb container will treat a home 100 - 200 linear feet in distance (6 inches wide). • If active subterranean termite infestations continue to occur in the area where the treatment was made, it is recommended that a licensed pest control operator be contacted for treatment (see Guarantee). • Applications must not be made when areas are waterlogged, snow covered, or frozen. Adequate distribution of the active ingredient into the soil cannot be achieved when these conditions exist. • Applications must not be made to hard surfaces, such as driveways, sidewalks, or patios. • Do not plant for the purpose of consumption, edible plants into the treated areas of soil for 1 year. • Food utensils such as teaspoons and measuring cups should not be used for food purposes after use with this insecticide. • Do not contaminate public and private water supplies.
<p>HOW TO USE</p>	<ul style="list-style-type: none"> • This product is formulated on a granulated carrier for perimeter band applications. When applied to soil, moisture (rainfall or irrigation) causes the granules to disintegrate and release the active ingredient into the uppermost layers of soil where termite foraging activity occurs. • This product must only be used on existing structures.


BUILDING FOUNDATIONS

<p>HOW TO APPLY</p>	<ul style="list-style-type: none"> • Open the container and sprinkle the granules onto the ground (bare soils, mulched areas, landscape beds, or turf grass) directly adjacent to the building foundation. Make a band of sprinkled granules 6 inches wide around the structure being treated. • Directly after application, water until moist, but not to the point of run-off. • Do not disrupt soil in the treated zone. • If significant disruption occurs (construction work, downspout erosion, landscaping, etc.) reapplication should be made as a spot treatment to those areas where the original treatment zone has been disrupted. Make a band of sprinkled granules 6 inches wide around the structure where the disruption occurred.
<p>HOW MUCH TO APPLY</p>	<ul style="list-style-type: none"> • This 9.0 lb container will treat a structure with an outside perimeter of 100 - 200 linear feet. Distribute granules evenly in a 6 inch wide band over these 100 - 200 linear feet, which equals to (0.75 grams A.I.) about 1 cup granules per 5 - 10 linear feet.

WOODEN POSTS AND POLES

<p>HOW TO APPLY</p>	<ul style="list-style-type: none"> • This product can be applied around wooden posts, wooden poles (such as, fences, decks, mailboxes), and other wooden constructions. • Sprinkle the granules evenly onto the ground (bare soil, mulched areas, landscape beds, or turfgrass) to provide a 6 inch wide band completely surrounding each post or pole. • Directly after application, water until moist, but not to the point of run-off.
<p>HOW MUCH TO APPLY</p>	<ul style="list-style-type: none"> • Distribute (sprinkle) granules evenly over the area to be treated. • For each linear foot treated, use (0.075 – 0.15 grams of A.I. in a half foot band around wooden post or pole) approximately 1.5 to 3.0 tablespoons of product in a 6 inch band around the wooden post or pole.

FOR BEST RESULTS	<ul style="list-style-type: none"> • Do not disturb the treatment after making application. • Keep landscaping a few feet from the home foundation. • Eliminate or correct sources of moisture around the home. Promptly repair any water leaks, clean gutters and downspouts regularly so water flows away from home, divert sprinkler water and AC condensation from home. Slope the grade so surface water drains away from the house. • Keep wood-based items, such as firewood, scrap lumber, fencing, stumps, and brush away from the home exterior. • Have a professional wood-destroying insect inspection performed annually.
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	Children and pets may re-enter after the treated area has been watered and allowed to dry.
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Important – Directions for Storage and Disposal	
Storage Conditions	Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.
Disposal	<p><i>If empty:</i></p> <ul style="list-style-type: none"> • Do not reuse container. • Place empty container in trash or offer for recycling if available. <p><i>If partly filled:</i></p> <ul style="list-style-type: none"> • Call your local solid waste agency or toll free 1-877-229-3724 [1-800 CLEAN-UP] for disposal instructions. • Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS	
Hazards to Humans and Domestic Animals	
CAUTION	
<ul style="list-style-type: none"> • Harmful if swallowed or absorbed through skin. • Causes eye irritation. • Avoid contact with skin, eyes, or clothing. • Wash thoroughly with soap and water after handling. 	

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FIRST AID +	
IF SWALLOWED	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 to 20 minutes.• Call a poison control center or doctor for treatment advice.
IF IN EYES	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.

NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel. **You may call toll-free 1-877-229-3763 for medical emergency information.** Active Ingredients: 0.37% Imidacloprid (CAS # 138261-41-3).

ENVIRONMENTAL HAZARDS
<ul style="list-style-type: none">• This product is highly toxic to aquatic invertebrates.• Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.• Do not contaminate water when disposing of equipment washwaters.

NOTICE: Research and testing have determined that the "Directions For Use" are appropriate for the proper use of Imidacloprid CTG under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

*Money back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

Bayer Advanced
A Business Group of Bayer CropScience, L.P.
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Imidacloprid CTG (PENDING) Submitted 03/08/06